



ITS TELECOMMUNICATIONS SYSTEMS, INC.
15925 SW Warfield Blvd. • P.O. Box 397 • Indiantown, Florida 34956
772-597-2111 • www.itstelecom.net

June 14, 2017

CONFIDENTIAL DOCUMENTS ENCLOSED

Ms. Carlotta S. Stauffer
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

REDACTED

RECEIVED-FPSC
2017 JUN 16 AM 10: 21
COMMISSION
CLERK

RE: PSC Docket No. 170132-TP – ITS Telecommunications Systems, Inc.
CAF/ICC Recovery Data Collection

Dear Ms. Stauffer:

In accordance with 47 C.F.R §51.917(d) and §51.917(e), ITS Telecommunications is certifying that as a Rate-of-Return Carrier we are eligible for CAF/ICC Recovery. ITS Telecommunications is also certifying that it is not seeking duplicate recovery per 47 C.F.R. §51.917(d)(vii).

With this in mind, you will find documents associated with the recovery for CAF/ICC and that ITS Telecommunications Systems, Inc. is filing them under a claim of confidentiality pursuant to the Section 364.183(1) of the Florida Statutes, and Rule 25-22-006(5)(a) of the Florida Administrative Code. One highlighted copy is sealed in an envelope marked "CONFIDENTIAL" with the confidential information highlighted in yellow and two redacted copies that are available for public inspection are enclosed.

If you should have any questions regarding this filing, please contact Donna J. Marreel at 772-597-3161 or at donnam@itstelecom.net.

Sincerely,

Bruce Russell
Chief Financial Officer

Enclosures

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
TEL (redacted)
CLK _____

Serving our community for over 50 years.

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2017 CAF ICC Data Collection

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Logged in User: Donna Marreel

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Study Area: ITS TELECOMM. SYS. (ID: 210331)

Study Area USAC Reports

[[View Printer-friendly report](#)]

2017 USAC Data Report (Test Period 2017-2018)

CONNECT AMERICA FUND

Data to be provided to USAC/FCC in June 2017 for CAF ICC Purposes

Current Settlement Type: Cost

Test Period 7/1/17-6/30/18 Post True-up (Filing) View

Rate-of-Return (ROR) Carrier Revenue Requirement

1	2011 Interstate Switched Access Revenue Requirement	
2	FY 2011 Intrastate Terminating Switched Access Revenues	
3	FY 2011 Net Reciprocal Compensation Revenues	\$0
4	2011 ROR Carrier Base Period Revenue (Line 1 + Line 2 + Line 3)	
5	ROR Carrier Baseline Adjustment Factor (0.95 ^ 6)	
6	ROR Carrier Revenue Requirement (Line 4 x Line 5)	
7	Pool Administration Expenses	
8	Total ROR Carrier Revenue Requirement (Line 6 + Line 7)	

Revenues from Reformed Intercarrier Compensation (ICC) Rates

9	Interstate Switched Access Revenues	
10	Interstate Allocated Switched Access Revenues#	
11	Transitional Intrastate Access Service Revenues	
12	Net Transitional Reciprocal Compensation Revenues	\$0
13	Total ICC Revenue (Line 10 + Line 11 + Line 12)	

Eligible Recovery

14	TRS Increment	
15	Regulatory Fees Increment	
16	NANPA Increment	\$0
17	Interstate Local Switching Support for Price Cap Affiliates	\$0
18	Adjustment for Double Recovery or Corrections	\$0
19	Test Period 15/16 Trueup - Net Impact on Total Eligible Recovery	
20	Eligible Recovery (Line 8 - Line 13) + (Line 14 + Line 15 + Line 16 + Line 18 + Line 19) - (Line 17)	

Revenues from Access Recovery Charges (ARC)

21	Residential ARC Revenues	
22	Single Line Business ARC Revenues	
23	Multi-Line Business ARC Revenues	
24	Total ARC Revenues (Line 21 + Line 22 + Line 23)	

Connect America Fund (CAF) ICC Support**

25	Connect America Fund (CAF) ICC Support (Line 20 - Line 24)	
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Revised CAF ICC Support with Imputed ARC Revenues for Broadband-Only Loops

26	ARC Revenue Adjustment	\$0
27	Adjusted Test Period 2017-2018 CAFICC Support (Line 25 - Line 26)	

NOTES:

#Per FCC Designation Order, calculated as (Sum of Line 9 for all TS pool participants) * (Line 1/ Sum of Line 1 for all TS pool participants)
 **NECA estimate provided for informational purposes only - actual to be calculated by USAC.

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Study Area: ITS TELECOMM. SYS. (ID: 210331)

Intrastate Revenues (FCC TRP exhibit)

Option 1: View TRP Output in Excel

Option 2: Download TRP Data in Excel

Intrastate Revenues

Test Year 2017-2018 Expected Maximum Intrastate Revenue: **\$6,991.46**

Col D --	Col E --	Col F --	Col G --	Col H --	Col I --	Col J -- H*I	Col K --	Col L --	Col M -- [(L/K)^(12/21)-1]*100	Col N -- H*L
Rate Element Description	Unit of Demand	7/1/2017 Interstate Rate	Test Year 2016-2017 Current Intrastate Rate	7/1/2017 Proposed Intrastate Rate	FY 2011 Intrastate Units: Terminating for Non-Dedicated or Originating and Terminating for Dedicated Elements	Intrastate Price-out with 7/1/2017 proposed intrastate rate and FY2011 Demand	FY 2016 Intrastate Units: Terminating for Non-Dedicated and total for Dedicated Elements	Test Year 2017-2018 Forecasted Intrastate Units	Intrastate Units Growth Rate %	TY 2017-18 Forecasted Intrastate Revenue
Terminating End Office Access Service Terminating End Office, Premium, per access minute	MOU	\$0.00356700	\$0.00500000	\$0.00356700						
Terminating End Office Access Service Terminating End Office, Non-Premium, per access minute	MOU	\$0.00356700	\$0.00500000	\$0.00356700	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Entrance Facility, Per Termination Voice Grade Two Wire	Termination	\$82.89	\$81.44	\$82.89	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Entrance Facility, Per Termination Voice Grade Four Wire	Termination	\$132.64	\$131.17	\$132.64	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Entrance Facility, Per Termination High Capacity DS1	Termination	\$404.09	\$399.62	\$404.09	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Entrance Facility, Per Termination High Capacity DS3	Termination	\$3,689.64	\$3,648.81	\$3,689.64	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Entrance Facility, Per Termination Synchronous Optical Channel OC3	Termination	\$3,762.33	\$0.00000000	\$3,762.33	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Entrance Facility, Per Termination Synchronous Optical Channel OC12	Termination	\$4,016.95	\$0.00000000	\$4,016.95	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Entrance Facility, Per Termination ESALT 2 Mbps	Circuit	\$715.72	\$0.00000000	\$715.72	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Entrance Facility, Per Termination ESALT 10 Mbps	Circuit	\$771.41	\$0.00000000	\$771.41	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Entrance Facility, Per Termination ESALT 50 Mbps	Circuit	\$999.41	\$0.00000000	\$999.41	0.00	\$0.00	0.00	0.00	0.00%	\$0.00

REDACTED

Direct Trunked Transport Facility/ Mile Voice Grade - Two Wire & Four Wire	Mile	\$5.90	\$5.83	\$5.90	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile High Capacity DS1	Mile	\$27.69	\$27.38	\$27.69	0.00	0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile High Capacity DS3	Mile	\$241.17	\$238.50	\$241.17	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC3	Mile	\$258.16	\$0.00000000	\$258.16	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile Synchronous Optical Channel OC12	Mile	\$324.04	\$0.00000000	\$324.04	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E1	Circuit Miles	\$81.54	\$0.00000000	\$81.54	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E2	Circuit Miles	\$54.37	\$0.00000000	\$54.37	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E3	Circuit Miles	\$80.96	\$0.00000000	\$80.96	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 2 Mbps DTF-E4	Circuit Miles	\$135.57	\$0.00000000	\$135.57	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E1	Circuit Miles	\$206.76	\$0.00000000	\$206.76	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E2	Circuit Miles	\$124.07	\$0.00000000	\$124.07	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E3	Circuit Miles	\$203.79	\$0.00000000	\$203.79	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 10 Mbps DTF-E4	Circuit Miles	\$417.99	\$0.00000000	\$417.99	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E1	Circuit Miles	\$578.95	\$0.00000000	\$578.95	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E2	Circuit Miles	\$385.99	\$0.00000000	\$385.99	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E3	Circuit Miles	\$665.56	\$0.00000000	\$665.56	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/ Mile ESALT 50 Mbps DTF-E4	Circuit Miles	\$1,186.15	\$0.00000000	\$1,186.15	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/Termination Voice Grade - Two Wire & Four Wire	Termination	\$59.34	\$58.68	\$59.34	0.00	\$0.00	0.00	0.00	0.00%	\$0.00

REDACTED

Direct Trunked Transport Facility/Termination High Capacity DS1	Termination	\$143.64	\$142.05	\$143.64			0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/Termination High Capacity DS3	Termination	\$922.39	\$912.18	\$922.39	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC3	Termination	\$960.40	\$0.00000000	\$960.40	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/Termination Synchronous Optical Channel OC12	Termination	\$2,091.09	\$0.00000000	\$2,091.09	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/Termination ESALT 2 Mbps	Circuit terms	\$190.28	\$0.00000000	\$190.28	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/Termination ESALT 10 Mbps	Circuit terms	\$232.62	\$0.00000000	\$232.62	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Direct Trunked Transport Facility/Termination ESALT 50 Mbps	Circuit terms	\$284.31	\$0.00000000	\$284.31	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Multiplexing, Per Arrangement DS3 to DS1	Termination	\$841.57	\$832.26	\$841.57	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Multiplexing, Per Arrangement DS1 to Voice	Termination	\$324.93	\$321.33	\$324.93	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Customer Node Per Node OC3 155.52 Mbps	Port	\$873.63	\$0.00000000	\$873.63	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Customer Node Per Node OC12 622.08 Mbps	Port	\$2,523.83	\$0.00000000	\$2,523.83	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Customer Premises Port, Per Port OC3 155.52 Mbps	Port	\$286.65	\$0.00000000	\$286.65	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Customer Premises Port, Per Port STS-1 51.84 Mbps	Port	\$344.18	\$0.00000000	\$344.18	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Customer Premises Port, Per Port DS3 44.736 Mbps	Port	\$344.18	\$0.00000000	\$344.18	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Customer Premises Port, Per Port DS1 1.544 Mbps	Port	\$88.22	\$0.00000000	\$88.22	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Add/Drop Multiplexing Central Office Port, Per Port DS1 1.544 Mbps	Port	\$70.58	\$0.00000000	\$70.58	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Add/Drop Multiplexing Central Office Port, Per Port OC3 155.52 Mbps	Port	\$286.65	\$0.00000000	\$286.65	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Add/Drop Multiplexing Central Office Port, Per Port DS3 44.736 Mbps	Port	\$176.48	\$0.00000000	\$176.48	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Network Blocking, Per Blocked Call Network Blocking, Per Blocked Call, Applies to FGD only	Call	\$0.01670000	\$0.00000000	\$0.01670000	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 2 Mbps	Facility	\$15.57	\$0.00000000	\$15.57	0.00	\$0.00	0.00	0.00	0.00%	\$0.00

REDACTED

ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 10 Mbps	Facility	\$77.87	\$0.00000000	\$77.87	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
ESALT Real Time CoS/QoS, Per ESALT DTF-E1 Facility ESALT 50 Mbps	Facility	\$242.30	\$0.00000000	\$242.30	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 2 Mbps	Circuit	\$289.05	\$0.00000000	\$289.05	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 10 Mbps	Circuit	\$289.05	\$0.00000000	\$289.05	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
ESALT Entrance Facility Protection, Per ESALT Entrance Facility ESALT 50 Mbps	Circuit	\$289.05	\$0.00000000	\$289.05	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Common Channel Signaling Network Connection Signaling Mileage Facility, Per Mile	Mile	\$7.96	\$0.00000000	\$7.96	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Common Channel Signaling Network Connection Signaling Mileage Termination, Per Termination	Termination	\$79.87	\$0.00000000	\$79.87	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Common Channel Signaling Network Connection Signaling Entrance Facility, Per Facility	Facility	\$152.98	\$0.00000000	\$152.98	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Common Channel Signaling Network Connection STP Port, Per Port	Port	\$788.31	\$0.00000000	\$788.31	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Terminating Tandem Switched Transport Terminating Tandem Switched Transport Facility	Minutes / Mile	\$0.00043800	\$0.00043300	\$0.00043800						
Terminating Tandem Switched Transport Terminating Tandem Switched Termination	Minutes	\$0.00227200	\$0.00224700	\$0.00227200						
Terminating Tandem Switched Transport Terminating Tandem Switching	Minutes	\$0.00573100	\$0.00000000	\$0.00573100	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges Voice Grade Two Wire	Facility	\$489.27	\$474.14	\$489.27	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges Voice Grade Four Wire	Facility	\$489.27	\$474.14	\$489.27	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges High Capacity DS1	Facility	\$358.81	\$347.70	\$358.81	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges High Capacity DS3	Facility	\$483.84	\$468.87	\$483.84	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges Synchronous Optical Channel OC3	Facility	\$391.42	\$0.00000000	\$391.42	0.00	\$0.00	0.00	0.00	0.00%	\$0.00

REDACTED

Nonrecurring Charges Synchronous Optical Channel OC12	Facility	\$391.42	\$0.00000000	\$391.42	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges Interim NXX Translation, Per Order	Order	\$239.21	\$231.80	\$239.21	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges FGC and FGD Conversion of Multifrequency Address Signaling to SS7 Signaling or SS7 Signaling to Multifrequency Address Signaling, per 24 trunks converted or fraction thereof on a per order basis	Order	\$480.57	\$465.70	\$480.57	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges Trunk Activation, per 24 trunks activated or fraction thereof on a per order basis	Order	\$499.05	\$483.61	\$499.05	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges Flexible Automatic Number Identification (Flex ANI), per End Office, per CIC	End Office	\$0.00000000	\$0.00000000	\$0.00000000	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges ESALT 2 Mbps	Facility	\$579.87	\$0.00000000	\$579.87	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges ESALT 10 Mbps	Facility	\$579.87	\$0.00000000	\$579.87	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges ESALT 50 Mbps	Facility	\$579.87	\$0.00000000	\$579.87	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges ESALT Direct Trunked Termination, per ESALT Direct Trunked Termination installed	Order	\$382.04	\$0.00000000	\$382.04	0.00	\$0.00	0.00	0.00	0.00%	\$0.00
Nonrecurring Charges ESALT Entrance Facility Protection, per ESALT Entrance Facility	Facility	\$586.14	\$0.00000000	\$586.14	0.00	\$0.00	0.00	0.00	0.00%	\$0.00

REDACTED



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Study Area: ITS TELECOMM. SYS. (ID: 210331)

Access Recovery Charges

Recalculate ARC Rates & CAF Support revenues

[Test Period 2017-18 Pre-True-up View](#) [Test Period 2017-18 Post-True-Up \(Filing\) View](#)

Test Period 2017-2018 Post True-Up (Filing) View

Exchange/Zone Name	Residential Lines excluding Lifelines	Residential ARC	Residential ARC Revenue	SLB Lines	SLB ARC	SLB ARC Revenue	MLB Lines	MLB ARC	MLB ARC Revenue	Total ARC Revenue
Indiantown Study Area Summary	[REDACTED]	\$3.00	[REDACTED]	[REDACTED]	\$3.00	[REDACTED]	[REDACTED]	\$3.00	[REDACTED]	[REDACTED]

TO BE COMPLETED BY THE REPORTING CARRIER.

Certification of Officer as to the Accuracy of the CAF ICC Data Reported

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual data reported; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier: ITS TELECOMM. SYS.

Signature of Authorized Officer: **Bruce Russell**

Digitally signed by Bruce Russell DN: cn=Bruce Russell, email=brucer@itstelecom.net, O=its telecomm. sys., I=Indiantown FL 34956, Date: 5/23/2017

Date: 5/23/2017

Printed name of Authorized Officer: Bruce Russell

Title or position of Authorized Officer: CFO

Telephone number of Authorized Officer: 772-597-2106

Study Area Code of Reporting Carrier	210331		Filing Due Date for this form (mm/dd/yyyy)	6/16/2017	
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Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING DATA ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Data Reported on Behalf of Reporting Carrier					
<p>I certify that (Name of Agent) <u>National Exchange Carriers Association, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the data provided to the Authorized Agent; and, to the best of my knowledge, the actual data provided to the Authorized Agent is accurate.</p>					
<p>Name of Authorized Agent : <u>National Exchange Carriers Association, Inc.</u></p>					
<p>Name of Reporting Carrier: <u>ITS TELECOMM. SYS.</u></p>					
<p>Signature of Authorized Officer: Bruce Russell</p>				<p>Digitally signed by Bruce Russell DN:cn=Bruce Russell,email=brucer@itstelecom.net,O=its telecomm,sys.=Indiantown FL 34956, Date:5/23/2017</p>	
<p>Date: <u>5/23/2017</u></p>					
<p>Printed name of Authorized Officer: <u>Bruce Russell</u></p>					
<p>Title or position of Authorized Officer: <u>CFO</u></p>					
<p>Telephone number of authorized officer: <u>772-597-2106</u></p>					
Study Area Code of Reporting Carrier	<u>210331</u>		Filing Due Date for this form (mm/dd/yyyy)	<u>6/16/2017</u>	
<p>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</p>					

TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

Certification of Officer for Rate-of-Return Carrier Eligibility for CAF/ICC Recovery

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier on this form certifies that it has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f).

Name of Reporting Carrier: ITS TELECOMM. SYS.

Bruce Russell

Digitally signed by Bruce Russell DN: cn=Bruce Russell, email=brucer@ittelecom.net, O=its telecomm. sys., I=Indiantown FL 34956, Date: 5/23/2017

Signature of Authorized Officer or employee:

Date: 5/23/2017

Printed name of Authorized Officer or employee: Bruce Russell

Title or position of Authorized Officer or employee: CFO

Telephone number of Authorized Officer or employee: 772-597-2106

Study Area Code of Reporting Carrier

210331

Filing Due Date for this form (mm/dd/yyyy)

6/16/2017

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY AN OFFICER OF THE REPORTING CARRIER

Certification of Officer for Rate-of-Return Carrier Not Seeking Duplicative Recovery

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism as per §51.917(d)(vii).

Name of Reporting Carrier: ITS TELECOMM. SYS.

Bruce Russell

Digitally signed by Bruce Russell DN:cn=Bruce Russell,email=brucer@itstelecom.net,O=its telecomm.sys.,l=Indiantown FL 34956, Date: 5/23/2017

Signature of Authorized Officer or employee:

Date: 5/23/2017

Printed name of Authorized Officer or employee: Bruce Russell

Title or position of Authorized Officer or employee: CFO

Telephone number of Authorized Officer or employee: 772-597-2106

Study Area Code of Reporting Carrier

210331

Filing Due Date for this form (mm/dd/yyyy)

6/16/2017

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.