

REDACTED



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

REDACTED

June 21, 2017

**CONFIDENTIAL DOCUMENTS ENCLOSED**

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

RECEIVED-FPSC  
2017 JUN 22 PM 1:54  
COMMISSION  
CLERK

RE: FPSC Docket No. 170132-TP  
2018 State Certification §54.313 and §54.314 – Annual Reporting Requirements for  
High-Cost Recipients and Certification of Support for Eligible Telecommunication Carriers

Dear Ms. Stauffer:

Enclosed is a copy of the FCC Form 481 for ITS Telecommunications Systems, Inc. as filed with the required information pursuant to sections §54.313 and §54.422 of the FCC's rules. Also enclosed for filing in the above referenced docket is the signed Affidavit of Bruce Russell on behalf of ITS Telecommunications certifying that all federal high cost support received by ITS Telecommunications in 2018 will only be used for the provisioning, maintenance, and upgrading of facilities and services for which such support is intended.

ITS Telecommunications Systems, Inc. has filed the financial information with the FCC under a claim of confidentiality and pursuant to the Section 364.183(1) of the Florida Statutes, and Rule 25-22-006(5)(a) of the Florida Administrative Code, we are filing this with the FPSC under the same claim of confidentiality. One highlighted copy is sealed in an envelope marked "CONFIDENTIAL" with the confidential information highlighted in yellow and one redacted copy that is available for public inspection are enclosed.

Please contact Donna Marreel at 772-597-3161 if you have any questions regarding this filing.

Sincerely,

Bruce Russell  
Chief Financial Officer

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL \_\_\_\_\_
- IDM \_\_\_\_\_
- TEL \_\_\_\_\_
- CLK \_\_\_\_\_

1 letter only

Serving our community for over 50 years.

AFFIDAVIT

STATE OF FLORIDA  
COUNTY OF MARTIN

BEFORE ME, the undersigned authority, personally appeared Bruce Russell, known to me to be a credible person and of lawful age, who deposed and said:

My name is Bruce Russell. I am employed by ITS Telecommunications Systems, Inc. ("ITS" or the "Company") as Chief Financial Officer. I possess substantial knowledge of the Company's operations and am an officer authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the certification of the Florida Public Service Commission ("Commission") as contemplated in 47 C.F.R. §54.313 and §54.314.

ITS hereby certifies that all federal high-cost support was used in the preceding calendar year, and will utilize it during 2018, only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. §254(e) of the Telecommunications Act of 1996.

ITS hereby certifies that it follows appropriate procedures for network outage reporting as per the Federal Outage Reporting Order and State Outage Reporting Requirements. For the period between March 1, 2016 and March 1, 2017, ITS did not have any Federal FCC or Florida Public Service Commission reportable outages.

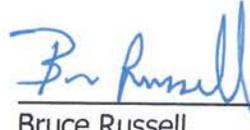
ITS hereby certifies that it did fulfill all requests for service from potential customers.

ITS hereby certifies that it received zero (0) FCC complaints during the period of March 1, 2016 through March 1, 2017. ITS received zero (0) complaints filed with the FPSC during the period March 1, 2016 to March 1, 2017.

ITS hereby certifies that it complies with the applicable state PSC quality of service standards and state consumer protection rules in accordance with Florida Statutes and the Florida Administrative Code.

ITS hereby certifies that it is able to function in emergency situations.

**FURTHER AFFIANT SAYETH NOT.**



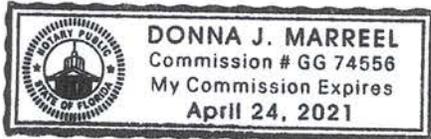
\_\_\_\_\_  
Bruce Russell  
Chief Financial Officer  
ITS Telecommunications Systems, Inc.

STATE OF FLORIDA  
COUNTY OF MARTIN

Acknowledged before me this 21 day of June, 2017 by Bruce Russell, as Chief Financial Officer of ITS Telecommunications Systems, Inc., who is personally known to me and did not take an oath.



\_\_\_\_\_  
Donna J. Marreel  
Notary Public



Personally known  \_\_\_\_\_  
Produced Identification \_\_\_\_\_  
Type of Identification Produced \_\_\_\_\_

June 21, 2017

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Re: WC Docket No. 14-58  
ITS Telecommunications Systems, Inc. 2018 Federal ETC Filing (FCC Form 481)

Dear Ms. Dortch:

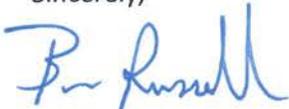
ITS Telecommunications Systems, Inc. respectfully files confidential and redacted versions of the FCC Form 481 ETC annual reporting information in compliance with the ETC Annual Reports and Certifications in WC Docket 14-58 and pursuant to 47 C.F.R. §54.313 and §54.422 of the Commission's rules.

Pursuant to 47 C.F.R. §0.457 and §0.459 of the FCC Rules, ITS Telecommunications Systems, Inc. is requesting that the FCC Form 481 and attachments be considered proprietary confidential business information due to the competition in our service area.

Enclosed please find one original marked Confidential and one copy marked Confidential and one copy marked Redacted of the FCC Form 481. The redacted version is also being filed this date via the FCC's Electronic Comment Filing System.

Please contact Donna Marreel at [donnam@itstelecom.net](mailto:donnam@itstelecom.net) if there are any questions.

Sincerely,



Bruce Russell  
Chief Financial Officer

Enclosures

**REDACTED – FOR PUBLIC INSPECTION  
ITS TELECOMMUNICATIONS SYSTEMS, INC.**

**ATTACHMENT LINE 3016**

**FINANCIAL REPORTS  
PURSUANT TO 47 C.F.R § 54.313**

**ATTACHMENT REDACTED IN ENTIRETY**

<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOMM. SYS.
<020> Program Year	2018
<030> Contact Name: Person USAC should contact with questions about this data	Donna Marree1
<035> Contact Telephone Number: Number of the person identified in data line <030>	7725973161 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	donnams1t@telecom.net
Form Type	54.313 and 54.422



(300) Unfulfilled Service Request  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOMM. SYS.
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Donna Marreel
<035> Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	donnam@itstelecom.net

<300> Unfulfilled service request (voice) NA

<310> Detail on attempts (voice)  
\_\_\_\_\_  
Name of Attached Document

<320> Unfulfilled service request (broadband) NA

<330> Detail on attempts (broadband)  
\_\_\_\_\_  
Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	210331
<b>&lt;015&gt;</b>	Study Area Name	178 TELECOMM. SYS.
<b>&lt;020&gt;</b>	Program Year	2018
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Donna Maxwell
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	donnamax@statelecom.net

**<400>** Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice

**<410>** Complaints per 1000 customers for fixed voice 0.0

**<420>** Complaints per 1000 customers for mobile voice

**<430>** Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband

**<440>** Complaints per 1000 customers for fixed broadband 0.0

**<450>** Complaints per 1000 customers for mobile broadband

**(500) Compliance With Service Quality Standards and Consumer Protection Rules**  
**Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOMM. SYS.
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Donna Harzeel
<035> Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	donnam@statelecom.net
<500> Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510> Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	210331f1510.pdf
<515> Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOM. SYS.
<020> Program Year	2011
<030> Contact Name - Person USAC should contact regarding this data	Donna Marzuel
<035> Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	donna@itstetelcom.net
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	210331F1610.pdf







(900) Tribal Land  
Data Collection

FCC Form 481  
 OMB Control No. 3060-0086/OMB Control No. 3060-0019  
 July 2013

<010>	Study Code	210331
<015>	Study Name	ITS TELECOMM. SYS.
<020>	Program	2018
<030>	Contact Person - Person USAC should contact regarding this data	Donna Marreel
<035>	Contact Phone Number - Number of person identified in data line <030>	7725973161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	donnam@itstelecom.net
<900>	Does filing entity offer tribal land services? (Y/N)	No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the information described on the attached PDF, on line 920, demonstrates compliance with the Tribal government pursuant to § 54.313(a)(9) requirements:

- <921> Need assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

<b>(1000) Voice Data Collection</b>	<b>Broadband Service Rate Comparability</b>	FCC Form 481 OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	210331
<015>	Study Area Name	ITS TELECOMM. SYS.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Donna Marreel
<035>	Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	donnam@itstelecom.net

<1000>	Voice services rate comparability certification	Yes
<1010>	Attach detailed description for voice services rate comparability compliance	210331f11010 .pdf
		Name of Attached Document
<1020>	Broadband comparability certification	Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance	210331f11030 .pdf
		Name of Attached Document

<b>(1100) No Terrestrial Backhaul Reporting Form</b>	<b>FCC Form 483</b>	<b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b>
		<b>July 2013</b>

<010>	State	Area Code	210331
<015>	State	Area Name	ITS TELECOMM. SYS.
<020>	Project	Year	2018
<030>	Contact	Name - Person USAC should contact regarding this data	Donna Marreel
<035>	Contact	Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039>	Contact	Email Address - Email Address of person identified in data line <030>	donnam@itstelecom.net

<1100> Please indicate whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms & Conditions for Lifeline Customers	FCC Form 481
Lifeline Data Collection Form	OMB Control No. 3060-0386/OMB Control No. 3060-0319
	July 2013

<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOMM. SYS.
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Donna Marreel
<035> Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	donna@itstelecom.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

<1220> Link to Public Website

HTTP [www.itstelecom.net/telephone.shtml](http://www.itstelecom.net/telephone.shtml)

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.



<010>	Study Area Code	210331
<015>	Study Area Name	ITS TELECOMM. SYS.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Donna Marreel
<035>	Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	donnam@itstelecom.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

**Progress Report on 5 Year Plan**  
 (3009) Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}  
 (3010B) Please Provide Attachment

Name of Attached Document Listing Required Information

210331f13010B.pdf

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}  
 (3012B) Please Provide Attachment

No - No New Community Anchors

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}  Yes  No

(3014) If yes, does your company file the RUS annual report (Yes/No)  Yes  No

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

210331f13015.pdf

(3018) If the response is no on line 3014, is your company audited? (Yes/No)  Yes  No

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(8004) Rate Of Return Data Collection Form	Part 4 Additional Documentation (Continued)	FCC Form 481 OMB Control No. 3060-0066/OMB Control No. 3060-0019 July 2013
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REDACTED

<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOMM. SYS.
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Donna Maxreel
<035> Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	donnam@its telecom.net

Financial Data Summary

(3027) Revenue

[Redacted]

(3028) Operating Expenses

[Redacted]

(3029) Net Income

[Redacted]

(3030) Telephone Plant In Service(TPIS)

[Redacted]

(3031) Total Assets

[Redacted]

(3032) Total Debt

[Redacted]

(3033) Total Equity

[Redacted]

(3034) Dividends

[Redacted]

Universal Service - Reporting Carrier Data Collection Form	FCC Form 481 Data Collection No. 3000-0000-0000-0000-0000-0000 July 2013
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<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOMM. SYS.
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Donna Marreel
<035> Contact Telephone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	donna@itstelecom.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	ITS TELECOMM. SYS.
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date 06/21/2017</span>
Printed name of Authorized Officer:	Bruce Russell
Title or position of Authorized Officer:	CFO
Telephone number of Authorized Officer:	7725972106 ext.
Study Area Code of Reporting Carrier:	210331 <span style="float: right;">Filing Due Date for this form: 07/03/2017</span>
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.	

## Attachments

### **Service Quality Standards and Consumer Protection Rules Compliance**

ITS Telecommunications Systems, Inc., DBA, ITS Telecom, certifies that our company complies with the applicable state and FCC Service Quality Standards and the Consumer Protection Rules.

With regards to the FCC 47 C.F.R. §64.2001-64.2011 rules for CPNI (Customer Proprietary Network Information), ITS Telecom has a policy manual that details and enforces the requirements of the federal rules. Our managers review the policies of CPNI on a yearly basis or as needed whenever a new hire is involved with our customer information. The company certifies its compliance annually with the FCC.

ITS Telecom also trains their employees on the Red Flag regulations to help identify Identity theft and through our IT Department, we have procedures to mitigate the potential damage of identity theft. Our IT Department has numerous measures in which to insure the integrity of our network and customer data.

ITS Telecom discloses their rates to our customers on our website, [www.itstelecom.net](http://www.itstelecom.net), provides protection to our customers with Anti-Slamming Procedures as adopted with the Florida Administrative Code and the Florida Statutes, and follows all other applicable federal and state requirements governing the protection of our customers' privacy.

### **Functionality in Emergency Situations**

ITS Telecommunications Systems, Inc., DBA, ITS Telecom, certifies that our company is compliant in emergency situations as set forth in the Code of Federal Regulations. We have a Disaster and Hurricane Preparedness Plan in place and update it periodically as needed. ITS Telecom has employees that attend yearly emergency scenario training sessions with both the Florida State Emergency Operations Department and the County Emergency Operations Department. There are ongoing communications with these Emergency Operations Departments when potential emergencies are identified. We have an IT Steering Committee that meets several times a year to review our Emergency Preparedness Policies.

ITS Telecom's central office is designed to withstand power failures through the use of batteries and backup generators. We also have backup generators for our remotes which will keep running until commercial power is restored as long as fuel is available. The IT Department and OSP perform scheduled routine maintenance of our batteries and generators. Our IT Department monitors our network 24/7/365 which ensures timely responses when a problem arises. Our serving area has network redundancy that provides an alternate route when needed.







### **Voice Services Rate Comparability Certification**

ITS Telecommunications Systems, Inc. hereby certifies that the price of our fixed residential voice service of \$18.00, effective January 1, 2017, and of \$23.00, effective July 1, 2017, is below the two standard deviations above the national average urban rate of \$49.51 as required in 47 C.F.R. § 54.313(a)(10).

### **Broadband Comparability Certification**

ITS Telecommunications Systems, Inc. hereby certifies that the rates of our fixed broadband for the download speeds of 10 Mbps and 25 Mbps with the upload speeds of 1 Mbps and 5 Mbps do not exceed the benchmark rates as required in 47 C.F.R. § 54.313(g).

### **Milestone Certification**

ITS Telecommunications Systems, Inc. hereby certifies that we have been able to provide speeds of at least 4Mbps down/1Mbps up for a majority of our broadband service subscribers. ITS Telecommunications Systems, Inc.'s provides broadband speeds of 10Mbps down/1Mbps up and higher to 81% of the units in our service area.

In early 2017, ITS Telecommunications Systems, Inc. constructed fiber to our Fox Brown Road area, which was originally scheduled to start June, 2019. The fiber construction was to encompass approximately 50 locations in that area and allows customers to subscribe up to 1 Gigabit symmetrical broadband service. As of the date of this report, ITS Telecommunications Systems, Inc. has twenty (20) residential customers from the Fox Brown Road Project subscribing to 200Mbps symmetrical broadband service or better and one business customer subscribing to business class fiber internet.

**REDACTED – FOR PUBLIC INSPECTION  
ITS TELECOMMUNICATIONS SYSTEMS, INC.**

**ATTACHMENT LINE 3016**

**FINANCIAL REPORTS  
PURSUANT TO 47 C.F.R § 54.313**

**ATTACHMENT REDACTED IN ENTIRETY**