



Your business
is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.isitel.com, e-mail: isi@isitel.com

May 15, 2020

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: Wireline Competition Bureau

**RE: Notification of Discontinuance of Common-Carriage Tariffed Wireline
Broadband Internet Access Service (“WBIAS”) and Initiation of Provision on
a Permissive Detariffed Common-Carriage Basis by:**

**ITS Telecommunications Systems, Inc.
FCC Registration Number 0003731734
Study Area Code 210331**

CC Docket No. 02-33

RECEIVED-FPSC
2020 MAY 19 PM 12:06
COMMISSION
CLERK

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of ITS Telecommunications Systems, Inc. (“Company”) respectfully files the attached notice pursuant to the *Wireline Broadband Order* of the intent of the Company to discontinue its Wireline Broadband Internet Access Service (“WBIAS”) offerings under an interstate access tariff filed with the Federal Communications Commission. The Company currently offers WBIAS in the form of Digital Subscriber Line (“DSL”) Access Service pursuant to NECA Tariff F.C.C. No. 5. Effective July 1, 2020, the Company will exit NECA Tariff F.C.C. No. 5 and become an issuing carrier for the JSI Tariff F.C.C. No. 1. However, the Company’s joining of the JSI Tariff F.C.C. No. 1 will be exclusive of DSL WBIAS.

Upon discontinuance of the tariffed offerings, the Company will provide WBIAS on a common-carriage non-tariffed basis. See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), (“*Wireline Broadband Order*”).

Echelon Building II, Suite 200
9430 Research Blvd, Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

3440 Blue Springs Road, NW, Suite 503
Kennesaw, GA 30144
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

Any questions regarding the notice may be directed to the undersigned.

Sincerely,

A handwritten signature in black ink that reads "John Kuykendall". The signature is written in a cursive style with a large initial "J" and "K".

John Kuykendall
Vice President
jkuykendall@jsitel.com

Attachment

cc: ITS Telecommunications Systems, Inc.
Special Assistant for Telecommunications at the Department of Defense
The Office of the Honorable Ron DeSantis, Governor of Florida
Florida Public Service Commission
National Exchange Carrier Association

**Notice of Permissive Detariffing of Wireline Broadband Internet Access Service
Effective July 1, 2020 by**

ITS TELECOMMUNICATIONS SYSTEMS, INC. – SAC 210331

PO Box 397
16001 S.W. Market Street
Indiantown, FL 34956
772-597-2111

CC Docket No. 02-33

ITS Telecommunications Systems, Inc. (“Company”) hereby provides notice that it plans to terminate provision of DSL wireline broadband Internet access service (“WBIAS”) on a tariffed basis effective July 1, 2020 at which time it plans to offer permissive detariffed WBIAS on a Title II common-carriage basis pursuant to paragraph 94 of the Federal Communications Commission’s *Wireline Broadband Order*.¹ The Company currently offers WBIAS through Digital Subscriber Line (“DSL”) Access Service under NECA Tariff F.C.C. No. 5.

Effective July 1, 2020, the Company will be canceled by NECA as an issuing carrier for NECA Tariff F.C.C. No. 5 switched and special access services concurrent with the Company becoming an issuing carrier for JSI Tariff F.C.C. No. 1 for switched and special access services, exclusive of WBIAS.

Impact on Customers

The only customer for the Company’s WBIAS is the Company’s affiliated Internet Service Provider (“ISP”) operation. The discontinuance of the tariffed offering of WBIAS will have no effect on the end user service provided by the Company’s ISP operation.

Serving Area

The Company’s provision of WBIAS is limited to its ILEC serving area in Florida.

Future Availability of WBIAS on a Permissive-Detariffed Common Carriage Basis

The Company will continue to make WBIAS available on a common-carriage basis through posting of rates, terms and conditions on its Internet web-site in a manner similar to that required for interstate and international interexchange services under Section 42.10 of the FCC’s rules (47 C.F.R. § 42.10).

¹ See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), (“*Wireline Broadband Order*”).

ITS TELECOMMUNICATIONS SYSTEMS, INC. – SAC 210331

PO Box 397
16001 S.W. Market Street
Indiantown, FL 34956
772-597-2111

WBIAS DETARIFFING TIMELINE

May 15, 2020

30-Day Notice filed with following:

Federal Communications Commission (under CC Docket No. 02-33)
Special Assistant for Telecommunications at the Department of Defense
The Office of the Honorable Ron DeSantis, Governor of Florida
Florida Public Service Commission
National Exchange Carrier Association

May 15, 2020

Notice to customers. As indicated above, the only customer for the Company's wireline broadband Internet Access Service ("WBIAS") is the Company's affiliated ISP operation. The 30-day notice to the ISP will be provided by interoffice memorandum cover with this notice attached.

June 16, 2020

Expected filing by National Exchange Carrier Association ("NECA") with the Federal Communications Commission ("FCC") on 15-day notice of a tariff transmittal that will include, inter alia, cancellation of ITS Telecommunications Systems, Inc. as an issuing carrier for NECA Tariff F.C.C. No. 5.

June 16, 2020

Expected filing by John Staurulakis Inc., ("JSI") of a transmittal adding ITS Telecommunications Systems, Inc. as an issuing carrier for JSI Tariff F.C.C. No. 1 exclusive of WBIAS.

July 1, 2020

Planned effective date for cancellation by NECA of ITS Telecommunications Systems, Inc. as an issuing carrier for NECA Tariff F.C.C. No. 5's switched and special access tariff.
Planned effective date for addition of ITS Telecommunications Systems, Inc. as an issuing carrier for JSI Tariff F.C.C. No. 1 switched and special access services, exclusive of WBIAS.

July 1, 2020 Forward

ITS Telecommunications Systems, Inc.'s WBIAS is available on common-carriage non-tariffed basis under rates, terms and conditions posted at www.itsfiber.com/ or available during business hours at the above address.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notification of Discontinuance of Tariffed Common Carrier Wireline Broadband Internet Access Service was served this 15th day of May, 2020, by mailing true and correct copies thereof, postage prepaid, to the following persons:

Secretary of Defense
Attn: Special Assistant for Telecommunications
1000 Defense Pentagon
Washington, D.C. 20301-1000

Office of Governor Ron DeSantis
State of Florida
The Capitol
400 S. Monroe St.
Tallahassee, FL 32399-0001

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

National Exchange Carrier Association
60 Columbia Road
Building A – 2nd Floor
Morristown, New Jersey 07960

/s/ Marty Klueh