



ITS TELECOMMUNICATIONS SYSTEMS, INC.

15925 SW Warfield Blvd. • P. O. Box 277

Indiantown, Florida 34956

772-597-2111

April 15, 2015

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

Re: ITS Telecommunications Systems, Inc. Response to the Local Competition Report Data Request

Dear Ms. Stauffer:

Attached please find ITS Telecommunications Systems, Inc.'s response to the Year 2015 Local Competition Data Request. Also included is the Form 477 submitted to the FCC earlier this year.

If you should have any questions, please contact me either by email at donnam@itstelecom.net or by phone (772) 597-3161.

Sincerely,

Donna J. Marreel
Regulatory Manager

Attachments

2015 Incumbent Local Exchange Carrier (ILEC) Questionnaire

(Due by April 15, 2015)²

ITS Telecommunications Systems, Inc.

TL712

Contact name & title: Donna J. Marreel, Regulatory Manager

Telephone number: 772-597-3161

E-mail address: donnam@itstelecom.net

Stock Symbol (if company is publicly traded): _____

1. Please provide a copy of the Form 477 you filed with the FCC with data as of **December: 31,2014**.
2. What percentage of your Florida residential and business customers purchase bundled (i.e. voice service packaged with additional services such as internet or video service) offerings? Please provide the percentage below. Do not include bundles of telecom-only services. If you do not offer bundled services, indicate "not applicable."

40% Residential
_____ Not applicable

38% Business

3. What services, other than local service, does your company currently provide in Florida? Please check all that apply.

Private line/special access

VoIP

Wholesale transport

Interexchange service

Cellular/wireless service

Wholesale loops

Fiber or copper based video service

Cable television

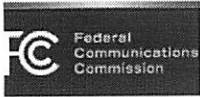
Satellite television

Broadband Internet access

4. Please provide any comments, suggestions or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. We would appreciate any comments or information on intermodal local competition (e.g., wireless, cable telephony, VoIP), reports or studies you have completed on CLEC market share, or anything else that you believe to be relevant.
5. Does your company currently publicly publish your service and price schedules for services offered in Florida at a location other than the Florida Public Service Commission? If yes, please indicate where and include the complete address or hyperlink if on a webpage. (Chapter 364.04, F.S.)

ITS Telecommunications' has their price lists on the company's website: www.itstelecom.net

The due date is established by Section 364.386(1)(b), Florida Statutes. Failure to comply with this rule may result in the Commission assessing penalties of up to \$25,000 per offense, with each day of noncompliance constituting a separate offense per Section 364.285(1), Florida Statutes.



Form 477 - Local Telephone Competition and Broadband Reporting

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Form 477 Filing Summary

FRN: 0018528893 | Data as of: Dec 31, 2014 | Operations: ILEC | Submission Status: Original - Submitted | Last Updated: Feb 25, 2015 15:19:53

Filer Identification

Legend ✓ Error free ✗ Error included

Section	Question	Response
Filer Information	Provider Name	ITS Telecommunications Systems, Inc.
	Holding Company Name	Postco, Inc.
	SAC ID	210331
	499 ID	811040
Data Contact Information	Data Contact Name	Donna Marreel
	Data Contact Phone Number	(772) 597-3161
	Data Contact E-mail	donnam@itstelecom.net
Certifying Official Contact Information	Certifying Official Name	Jeffrey Leslie
	Certifying Official Phone Number	(772) 597-2104
	Certifying Official E-mail	jeffl@itstelecom.net

Fixed Services

Fixed Broadband Deployment

1 files and 283 records accepted:

File Name	Date & Time	Number of Rows	Status
ITS TELECOM, 210331, 12-31-14, BB DEPLOYMENT.txt	Feb 25, 2015 15:02:01	283	✓

Fixed Broadband Subscription

1 files and 59 records accepted:

File Name	Date & Time	Number of Rows	Status
ITS TELECOM, 210331, 12-31-14 ,BB SUBSCRIPTION.csv	Feb 25, 2015 14:35:27	59	✓

Fixed Voice Subscription

0 files and 3 records accepted:

File Name	Date & Time	Number of Rows	Status
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Mobile Services



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[Help \(https://esupport.fcc.gov/request.htm\)](https://esupport.fcc.gov/request.htm) | OMB No. (OMB Number) 3060-0816

FRN: 0018528893

ITS Telecommunications Systems, Inc.

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Fixed Voice Subscription - Interactive Data Entry

For each census tract in which you have voice-grade equivalent (VGE) lines and / or interconnected VoIP subscribers in service, enter the total number of lines/subscriptions and the number of lines/subscriptions you provide to consumers. Rows must be unique by census tract and service type (the State, County and Tract together uniquely define a particular census tract, and the service type must be either VGE lines or VoIP subscriptions).

* All fields are required

* State:

* County:

* Tract:

* Service Type:

* VGE Lines or VoIP Subscriptions:

* Consumer VGE Lines or VoIP Subscriptions:

* Business / Govt VGE Lines or VoIP Subscriptions:

Sequence ID	State	County	Tract	Service Type	VGE Lines or VoIP Subscriptions	Consumer VGE Lines or VoIP Subscriptions	Business / Govt VGE Lines or VoIP Subscriptions	Actions
3	Florida	Martin	18.02	VGE	574	353	221	
2	Florida	Martin	18.01	VGE	1410	1043	367	
1	Florida	Martin	17	VGE	217	195	22	

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For help or assistance please contact us at 1-877-480-3201 or 1-717-338-2824 (TTY) or you may submit requests online via **e-support**. (<https://esupport.fcc.gov/request.htm>)

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445 12th Street SW
Washington, DC 20554

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Required Browser & Plug-ins (<http://www.fcc.gov/encyclopedia/required->

FOIA (<http://www.fcc.gov/foia>)
No Fear Act Data (<http://www.fcc.gov/encyclopedia/no-fear-act-data>)
Open Government Directive (<http://www.fcc.gov/open>)
Plain Writing Act (<http://www.fcc.gov/encyclopedia/plain-writing-fcc>)
2009 Recovery and Reinvestment Act (<http://www.fcc.gov/encyclopedia/american-recovery-and-reinvestment-act-2009>)



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Local Exchange Telephone Subscription

For each state in which you have one or more customers,

1. allocate lines provided to other providers between Wholesale and UNE-L;
2. allocate lines provided to end users by (a) Services Sold, (b) Product Type, (c) Ownership and (d) Last-mile Medium; and
3. click Save Current State, then go to the next state using the menu at the left or click Finished ».

For more information about how to allocate your lines, click here (http://www.fcc.gov/form477/FVS/allocating_vge_lines.pdf). Every cell must contain a number. Blanks will cause an error. Save your work as you go and when you've entered data for each state, click Finished »

Each cell must contain a number, even if it's zero!

Subscriptions Listed By State

Florida

Florida

* All fields are required

Lines provided to Unaffiliated Providers

Wholesale:

0

UNE-L:

0

Lines provided to End Users...

by Services Sold

Total:

2201

Voice with Internet:

1386

Voice without Internet:

815

by Product Type

Total:

2201

Consumer Total

1591

Business /Gov. (Government) Total

610

Consumer & No PIC (Presubscribed Interexchange Carrier):

353

Business/Gov. (Government) & No PIC (Presubscribed Interexchange Carrier):

313

Consumer & PIC (Presubscribed Interexchange Carrier):

1238

Business/Gov. (Government) & PIC (Presubscribed Interexchange Carrier):

297

by Ownership

Total:

2201

Owned:

2201

UNE-L:

0

Resale:

0

by Last-mile Medium

Total:

2201

FTTP:

1627

Coaxial Cable:

0

Fixed Wireless:

0

Copper:

574

[Cancel](#)[Next State](#)[Continue »](#)

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[2009 Recovery and Reinvestment Act \(http://www.fcc.gov/encyclopedia/american-recovery-and-reinvestment-act-2009\)](http://www.fcc.gov/encyclopedia/american-recovery-and-reinvestment-act-2009)