



ITS TELECOMMUNICATIONS SYSTEMS, INC.

15925 SW Warfield Blvd. • P.O. Box 397 • Indiantown, Florida 34956

772-597-2111 · www.iREDACTED

June 21, 2017

## CONFIDENTIAL DOCUMENTS ENCLOSED

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

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.

Bruce Russell Chief Financial Officer

Sincerely,

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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 2 | Page

### **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 Statues and the Florida Administrative Code.

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

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 3 | Page

## FURTHER AFFIANT SAYETH NOT.

Bruce Russell

Chief Financial Officer

ITS Telecommunications Systems, Inc.

STATE OF FLORIDA COUNTY OF MARTIN

Acknowledged before me this <u>21</u> day of <u>June</u>, 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 Commission # GG 74556 My Commission Expires April 24, 2021 Donna J. Marree Notary Public

Personally known \_\_\_\_\_\_Produced Identification \_\_\_\_\_

Type of Identification Produced



#### ITS TELECOMMUNICATIONS SYSTEMS, INC.

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

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 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

m 481 - Gerrier Afinual Reporting  Data Collection Form	FET COM RES SAFE Extend the SUB-COMPTON CHANNEL COST COST SAFE STREET
Study Area Code	210331
Study Area Name	ITS TELECOMM. SYS.
Program Year	2019
Contact Name: Person USAC should contact with questions about this data	Donna Marreel
Contact Telephone Number: Number of the person identified in data line <030>	7725973161 ext.
Contact Email Address: Email of the person identified in data line <030>	donnam@itatelecom.net
Form Type	54.313 and 54.422
	Study Area Code Study Area Name Program Year Contact Name: Person USAC should contact with questions about this data Contact Telephone Number: Number of the person Identified in data line <030> Contact Email Address: Email of the person identified in data line <030>

	rice Oral ection F		eporting (Vol	<b>œ)</b>						ON	Form 481 IB Control No. 3060 2013	-0986/OMB Control N	o. 3060-0819
<010>	Study		de				210331						
015>	Study		ıme				ITS TELECOM	M. SYS.					
020>	Progr	ù	l				2018						
)30>	Conta	1	- Person USA	Should contac	t regarding this	data	Donna Marre	el					
)35>	Contail	- 5	hone Number	- Number of pe	rson identified	in data line <0	30> <sup>7725973161</sup>	ext.					
)39>	Conta		Address - Ema	il Address of pe	erson identified	in data line <0	30> donnam@itst	elecom.net					
210>	For the		r calendar yea	ar, were there	any reportal	ole voice serv	ice outages?	No					
220>			<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
	NO Refere Numb		Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventativ Procedure
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	rulfilled : e_ice Request ection Fori	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 TELBCOMM. 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> U	Infulfilled service request (voice)	NA
<310> I	Detail on attempts (voice)	
	N	Name of Attached Document
<320>	Unfulfilled service request (broadband)	NA
<330>	Detail on attempts (broadband)	
		Name of Attached Document

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(400) Number of Compilaints per 1,000 customers Date Collection Form		FCC Form 461 OMB Cantrol No. 3060-0986/OMB Control No. 3060-0819 July 2013

		July 2013
-010:	Charles and Control	
<010>	Study Area Code 210331	
<015>	Study Area Name 178 TELECOMM. SYS.	
<020>	Program Year	
<030>	Contact Name - Person USAC should contact regarding this data	rreel
<035>	Contact Telephone Number - Number of person identified in data line <030>	25973161 ext.
<039>	Control Carell Address Carell Address Control Control Control	onnammatatelecom.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	

<ol> <li>Compliance With Service Quality Standards and Consumer Protection Rules a Collection Form</li> </ol>	FCC Form 481 OMB Centrol No. 3060-0586/OMB Control No. 3060-0819 July 2013
D10> Study Area Code	210331
115> Study Area Name	1TS TELECOMM, SYS
)20> Program Year	2018
30> Contact Name - Person USAC should contact regarding this data	Donne Marreel
	7725973161 ext.
120 C-1-1-1 11 11 1 1 1 1 1 1 1 1 1 1 1 1 1	domnamitstelecom.net
00> Certify compliance with applicable service quality standards and consumer prot	otection rules Yes
	210331f1510.pdf
10> Descriptive document for Service Quality Standards & Consumer Protection Rule	les Compliance
15> Certify compliance with applicable minimum service standards	

A 100

(600) Functionality in Emergency Situations	FCC Form 481
Deta Collection Form	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
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	210331f1610.pdf

5 5 6	rice Of e ings including Voice Rate Data ollection 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	Domna Marreel	
<035>	Contact Telephone Number - Number of person identified in data li	ne <030> 7725973161 ext.	
<039>	Contact Email Address - Email Address of person identified in data		
	Residential Local Service Charge Effective Date  1/1/2017 Single State-wide Residential Local Service Charge 1.0		

<703>

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State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fee
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<015>	Study	me	ITS TELECOMM. SYS.
<020>	Program		2018
<030>	Conta	· Pe	son USAC should contact regarding this data Donna Marreel
<035>	Conta	hone	Number - Number of person identified in data line <030> 7725973161 ext.
<039>	Conta	' Add	ess - Email Address of person identified in data line <030> donnameitstelecom.net

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	i <u>te</u>	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowan Action Taken Wi Limit Reached ( <i>se</i>
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(800) Op Data Col				FCC Form 461. CIMB Control No. 3066-0386/CMB Control No. 3060-0819 July 2018
				HOLEGICA
<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	1	
<035>	Contact Telephone Number - Number of person identified in data line <030>	7725973161 ex	xt.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	donnam@itste	lecom.net	
<810>	Reporting Carrier ITS Telecommunications Systems, Inc.			
<811>	Holding Company Postco, Inc.			
<812>	Operating Company ITS Telecommunications Systems, Inc.			
<813>	<b>4</b>		42	445
	Affiliates		SAC	Doing Business As Company or Brand Designation
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(900) Tribal La Data Calluction	orting	FCC Form 481 DMB Control No. 3060-0986/OMB Control No. 3060-0819 109/2013
<010> Stud	ode	210331
<015> Study	Name	ITS TELECOMM. SYS.
<020> Prog	ı <u>r</u> '	2018
<030> Cont	e - Person USAC should contact regarding this data	Donna Marreel
<035> Cont	phone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Cont	il Address - Email Address of person identified in data line <030>	donnam@itstelecom.net
<900> Doc:	filing entity offer tribal land services? (Y/N)	No
<910> Trib:	I(s) on which ETC Serves	
	·.	
<920> Trib)	nernment Engagement Obligation	Name of Attached Document
If your compa- to confirm the demonstrates § 54.313(a)(9)	described on the attached PDF, on line 920, nation with the Tribal government pursuant to	Select Yes or No or
<921> Nee:	essment and deployment planning with a focus on Tribal $j$ anchor institutions.	Not Applicable
<922> Fea:	eand sustainability planning;	
<923> Mar /	; services in a culturally sensitive manner;	
<924> Con	e with Rights of way processes	
<925> Coni	e with Land Use permitting requirements	
	e with Facilities Siting rules	
<927> Coni	e with Environmental Review processes	
	e with Cultural Preservation review processes	
	•	
<929> Con	ce with Tribal Business and Licensing requirements.	

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(1000) Voic Broadba	Service Rate Comparability FCC Form 481
Distriction of Asia	
	OMB Control No. 3060-0985/QMB Control No. 3060-0819
	104×2013
.040. 0. 1	
<010> Study Area Code	210331
<015> Study Area Name	ITS TELECOMM. SYS.
	abbotili olo.

Donna Marreel

2018

Program Year

<030> Contact Name - Person USAC should contact regarding this data

<020>

Contact Telephone Number - Number of person identified in data line <030> 7725973161 ext.  Contact Email Address - Email Address of person identified in data line <030> donnam@itstelecom.net  Cloudy Voice services rate comparability certification Yes  Cloudy Attach detailed description for voice services rate comparability compliance  Name of Attached Document  Yes - Pricing is no more than the most recent applicable benchman the Wireline Competition Bureau  Cloudy Attach detailed description for broadband comparability compliance  Name of Attached Document  Name of Attached Document  Name of Attached Document  Name of Attached Document		Contact Hame Terson OSAC should contact regarding this data	Donna Marreel
<1000> Voice services rate comparability certification Yes <1010> Attach detailed description for voice services rate comparability compliance Name of Attached Document Yes - Pricing is no more than the most recent applicable benchman the Wireline Competition Bureau <1020> Attach detailed description for broadband comparability compliance 210331f11030 .pdf 210331f11030 .pdf	<035>	Contact Telephone Number - Number of person identified in data line	2 <030> 7725973161 ext.
<1010> Attach detailed description for voice services rate comparability compliance Name of Attached Document <1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchman the Wireline Competition Bureau <1030> Attach detailed description for broadband comparability compliance 210331f11030.pdf	<039>	Contact Email Address - Email Address of person identified in data line	e <030> donnam@itstelecom.net
<1010> Attach detailed description for voice services rate comparability compliance Name of Attached Document <1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchman the Wireline Competition Bureau <1030> Attach detailed description for broadband comparability compliance 210331f11030.pdf	<1000>	Voice services rate comparability certification	Yes
<1020> Broadband comparability certification  Yes - Pricing is no more than the most recent applicable benchman the Wireline Competition Bureau  <1030> Attach detailed description for broadband comparability compliance  210331f11030.pdf	<1010>		210331fl1010 .pdf
<1020> Broadband comparability certification the Wireline Competition Bureau <1030> Attach detailed description for broadband comparability compliance			Name of Attached Document
comparability compliance	<1020>	Broadband comparability certification	Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau
Name of Attached Document	<1030>	· · · · · · · · · · · · · · · · · · ·	210331f11030.pdf
			Name of Attached Document

(1:100) A Data Co	3394333388888		ai Backhaul Reporting m	FCC Form 481 OMB Control No.: 3060-0986/OMB Control No.: 3060-0819 July 2013
<010>	Stu	. t. :	ea Code	0331
<015>	Stu		rea Name	S TELECOMM. SYS.
<020>	Pro		Year 2	018
<030>	Cor		Name - Person USAC should contact regarding this data	onna Marreel
<035>	Cor		"elephone Number - Number of person identified in data line <030> 7	725973161 ext.
<039>	Cor	[* ·	I mail Address - Email Address of person identified in data line <030> a	onnam@itstelecom.net
<1100>	į		er whether terrestrial backhaul options exist (Y/N)	Yes
<1130>	Plea repo	ŗr	lect the appropriate response (Yes, No, Not Applicable) to confirm the arrier offers broadband service of at least 1 Mbps downstream and 256 kb within the supported area pursuant to § 54.313(g).	ps

(1200) Te Lifeline Data Coli				FCC Form 481 OMB Control No.: 3060-0986/OMB Control No.: 3060-0819 July 2018
<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 lin	e <030>	7725973161 ext.	
<039>	Contact Email Address - Email Address of person identified in data lin	ie <030>	donnam@itstelecom.net	
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans			
<1220>	Link to Public Website	нттр ,	www.itstelecom.net/telephone.shtml	Name of Attached Document
or the we	neck these boxes below to confirm that the attached document(s), on line 12 bate listed, on line 1220, contains the required information pursuant to a)(2) annual reporting for ETCs receiving low-income support, carriers must eport:	10,		
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	7		
<1222>	Details on the number of minutes provided as part of the plan,	<b>V</b>		
<1223>	Additional charges for toll calls, and rates for each such plan.	<b>✓</b>		

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<010>	Study Area Code						
<015>	Study Area Name	······································	210331 TTC TEI	ECOMM. S	ve		· · · ·
<020>	Program Year		2018	BCOMM. B	10.		····
<030>	Contact Name - Person USAC should contact regarding this	data	Donna M	arreel			<del></del>
<035>	Contact Telephone Number - Number of person identified in	n data line <030>	77259731				
<039>	Contact Email Address - Email Address of person identified	n data line <030>		itstelec	om.net		
10332	Contact cinal Address - Cinal Address of person dentified						
financial r	m the drop down menu or check the boxes below to eporting requirements set forth in 47 CFR 54.313(f) pelow is accurate.	note compliance	with 54.313(	f)(1). Privately	held carriers must	ensure compliance	with the
(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)						
(3010A)	Certification of Public Interest Obligations {47 CFR §		Yes - At	tach Certifica			
(3010B)	54.313(f)(1)(i)) Please Provide Attachment	Name of Attache	ed Document Li	isting Required	210331f13010B.pd		
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	Information No - No New Comm					
(3012B)	Please Provide Attachment	Name of Attache	ed Document Li	sting Required			
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313{f}(2)}	Information (Yes/No)	<b>•</b>	0	L		
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	•	O			
(3015) (3016)	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: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) Document(s) with Balance Sheet, Income Statement		[	<i>(</i>			
(3017)	and Statement of Cash Flows If the response is yes on line 3014, attach your	Name of Attache	ed Document Li	isting Required	210331f13015.pd	ı	
,,	company's RUS annual report and all required documentation	Information			L		
(3018)	If the response is no on line 3014, is your company audited? 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:	(Yes/No	o) O	0			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS						
(3020)	Operating Report for Telecommunications Borrowers 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						
(3022)	boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: 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						
(3023)	comparable to RUS Operating Report for Telecommunications Borrowers Underlying information subjected to a review by an independent certified public accountant						
(3024)	Underlying information subjected to an officer certification.						
regae	The same of the sa				ar e deservição Ar Elegano		
(3026)	Attach the worksheet listing required information	Name of Attache	ed Document Li	sting Required	1		i
(3020)	Account the Horksheet mating required information	Information	Document Li	erus vedauca			

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Flat Add Clares Communication (Complement)
for Additional Documentation (Continued) FCC Form 481.
TAXA E CANADA
DMB Control No. 3050-0595/OMB Control No. 3050-0515
SAME CONTOURO, SUBSESSOR MADE CONTOURO, SUBSESSOR SUBSES
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>	donnameitstelecom.net

# REDACTED

#### Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

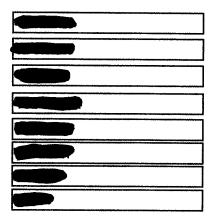
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



		CONTRACTOR OCCUPANTO CONTRACTOR DECIMAL DECIMA
Service Company of Company		
<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

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

l certify that I am an officer of the reporting carrier; my responsibiliti recipients; and, to the best of my knowledge, the information reporte	s include ensuring the accuracy of the annual reporting requirements for universal service suppor d on this form and in any attachments is accurate.
Name of Reporting Carrier: ITS TELECOMM. SYS.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/21/2017
Printed name of Authorized Officer: Bruce Russell	
Title or position of Authorized Officer: CPO	
Telephone number of Authorized Officer: 7725972106 ext.	
Study Area Code of Reporting Carrier: 210331	Filing Due Date for this form: 07/03/2017

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, <a href="www.itstelecom.net">www.itstelecom.net</a>, 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.

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<039>	Contact Email Address - Email Address of person identified in data line <030>	donnam@itstelecom.net

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2017

<703>

<21>	42>	<035	কাচ	<02>	4035	<b>(344)</b>	<05>	<b>*</b>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fe
FL	Indiantown		FR	18.0	0.0	0.0	0.0	18.0
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## (710) Broadba Data Collectio

e Offerings

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

<010> Stud	Code	210331
<015> Stud	<sup>1</sup> Name	ITS TELECOMM. SYS.
<020> Prog	ir.	2018
<030> Conf	ie - Person USAC should contact regarding this data	Donna Marreel
<035> Cont	phone Number - Number of person identified in data line <030>	7725973161 ext.
<039> Cont	il Address - Email Address of person identified in data line <030>	donnameitstelerom net

<711> <711

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Exchange (ILEC)	Residential	State Regulated	Total Rates	Broadband Service - Download Speed	Broadband Service	Usage Allowance	Usage Allowance Action Taken
	Rate	Fees	and Fees	(Mbps)	-Upload Speed (Mbps)	(GB)	When Limit Reached (select)
Indiantown	47.95	0.0	47.95	3.0	1.0	999999.0	Other, No Usage Allowance nor Limits
Indiantown	52.95	0.0	S2.95	6.0	1.0	999999.0	Other, No Usage Allowance nor Limits
Indiantown	62.95	0.0	62.95	10.0	1.0	999999,0	Other, No Usage Allowance nor Limits
Indiantown	72.95	0.0	72.95	16.0	1.0	999999.0	Other, No Usage Allowance nor Limits
Indiantown	37.95	0.0	37.95	10.0	10.0	999999.0	Other, No Usage Allowance nor Limits
Indiantown	42.95	0.0	· · · · · · · · · · · · · · · · · · ·				Other, No Usage Allowance nor Limits
Indiantown	52.95	0.0	42.95	50.0	50.0	999999.0	Other, No Usage Allowance nor Limits
Indiantown	32.93	0.0	52.95	200.0	200.0	999999.0	
	62.95	0.0	62.95	500.0	500.0	999999.0	Other, No Usage Allowance nor Limits
Indiantown	112.95	0.0	112.95	1000.0	1000.0	999999.0	Other, No Usage Allowance nor Limits
							***************************************
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<039>		ail Address of person identified in data line <030>	donnam@itstelecom.net
<810>	Reporting Carrier	ITS Telecommunications Systems, Inc.	
<811>	Holding Company	Postco, Inc.	
<812>	Operating Company	ITS Telecommunications Systems, Inc.	

> <b>44</b>	<a2>&gt;</a2>	<b>43&gt;</b>
Affiliates	SAC	Doing Business As Company or Brand Designation
ITS Telecommunications Systems, Inc.	210331	ITS Telecom

# **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**