



Internet
Voice
Cloud Services
IT Services
Data Center Colocation
DirectTV

June 11, 2019

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
2019 JUN 14 AM 8:21
COMMISSION
CLERK

RE: PSC Docket No. 20190119-TP – ITS Telecommunications Systems, Inc. d/b/a ITS
Fiber ("ITS Fiber")
CAF/ICC Recovery Data Collection

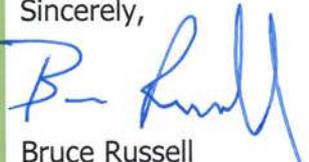
Dear Ms. Stauffer:

In accordance with 47 C.F.R §51.917(d) and §51.917(e), ITS Fiber is certifying that as a Rate-of-Return Carrier we are eligible for CAF/ICC Recovery. ITS Fiber 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 Fiber 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@itsfiber.com.

Sincerely,


Bruce Russell
Chief Financial Officer

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM 1
- CLK _____

REDACTED**2019 CAF ICC Data Collection**

[NECA Home](#) [NECA Data Collections](#) [Contact Us](#) [CAF ICC - Instructions & Documents](#) [NECA IR - Paper Certification Tracking](#) [Lc](#)

Logged in User: Donna Marreel

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Study Area: ITS TELECOMMUNICATIONS SYSTEMS, INC. (ID: 210331)

Study Area Test Period 2019-20 Summary Report

View Summary Report in Excel

**Summary Report for Study Area ID 210331 - For data collected during year 2019
Test Period 2019-2020**

Interstate Revenues Eligible Recovery Data

Study Area Amounts

1	TY 2011-2012 Frozen Interstate Switched Access Revenue Requirement excluding Pool Administration Expenses	
2	Projected TY 2019-2020 Interstate Switched Access Revenue Requirement + Pool Administration Expenses	
3	Current TY 2018-2019 Interstate Terminating Switched Access End Office Rate = \$0.0007+1/3* (0.005-0.0007)	\$0.002133
4	Proposed July 1, 2019 Interstate Terminating Switched Access End Office Rate = \$0.0007	\$0.000700
5	TY 2018-2019 Total Interstate Switched Access Composite Rate incl Rate Impact due to Changes in Pool Participation	\$0.030448
6	Projected TY 2019-2020 Total Interstate Local Switching Minutes	
7	Projected TY 2019-2020 Total Interstate Switched Access Revenue at the Current Rate	
8	Projected TY 2019-2020 Interstate Terminating Switched Access End Office (Local Switching) Minutes	
9	Projected TY 2019-2020 Interstate Terminating Switched Access End Office Revenue at Current Rate	
10	Projected TY 2019-2020 Interstate Terminating Switched Access End Office Revenue at Proposed Rate	
11	Adjustments to the Total Projected TY 2019-2020 Interstate Switched Access Revenue	
12	Projected TY 2019-2020 Total Interstate Switched Access Revenue at the Proposed Rate	
13	Projected TY 2019-2020 Allocated Interstate Switched Access Revenue	

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14A	Adjustments to the 2011-2012 Interstate Switched Access Revenue Requirement to Avoid Double Recovery	\$0.00
14B	<i>No double recovery option is selected</i>	
14C1	Adjustment in 2011-2012 Interstate Special Access Revenue Requirement Related to Double Recovery	\$0.000000
14C2	Adjustment in 2011-2012 Interstate Common Line Revenue Requirement Related to Double Recovery	\$0.000000
14C3	Adjustment in 2011-2012 Other Related to Double Recovery	\$0.000000
14	Projected TY 2019-2020 Interstate Eligible Recovery	
14D	True-Up Adjustments for Interstate Switched Access in 2016-2017 and 2017-2018 for Double Recovery	\$0.00
14E	Adjusted TY 2019-2020 Interstate Eligible Recovery	--
15	Proposed TY 2019-2020 Total Interstate Switched Access Composite Rate	\$0.029882
16	FY 2018 (October 1, 2017 - September 30, 2018) Total Interstate Local Switching Minutes	--
17	TY 2019-2020 Growth Rate relative to FY 2018	

(Interstate Data for Study Area 210331)

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Intrastate Revenues Eligible Recovery Data

Study Area Amounts

Line 1	FY 2011 (October 2010 through September 2011) Received Revenue including Correction of Errors and Halo	
Line 2	95% of Total TY2019-2020 Revenue Requirement (95% ⁸ Line 1)	
(Option B) Line 9	Projected Total TY2019-2020 Intrastate Terminating Switched Access Service Revenue	
Line 10	Test Year 2019-2020 Net settlement from the State Pool	\$0.00
Line 11	Test Year 2019-2020 State Terminating Access Support Rebalancing Fund Revenue	\$0.00
Line 12	Total Test Year 2019-2020 Projected Intrastate Terminating Switched Access Service Revenue	
Line 13A	Adjustments to FY2011 Received Revenue due to Halo Uncollectibles	\$0.00
Line 13B	Correction of Errors Resulting in Downward Adjustments in FY2011 Received Revenue	\$0.00
Line 13C	Adjustments to FY2011 Received Revenue to Avoid Double Recovery	\$0.00
Line 13D	Correction of Errors Resulting in Upward Adjustments in FY2011 Received Revenue	\$0.00
Line 13	The Total TY 2019-2020 Intrastate Eligible Recovery	
Line 13E	True-Up Adjustment for Intrastate Terminating Switched Access in 2013-2014, 2014-2015, 2015-2016, 2016-2017 and 2017-2018 for Double Recovery	\$0.00
Line 13F	Adjusted TY2019-2020 Intrastate Eligible Recovery	
	(Intrastate Data for Study Area 210331)	

REDACTED**Reciprocal Compensation Revenue Eligible Recovery Data**

		CMRS Amount	NON CMRS Amount
Line 1/Line 10	FY2011 (October 2010 through September 2011) Net Reciprocal Compensation Received Revenue	\$0.00	\$0.00
Line 2/Line 11	TY 2019 - 2020 Terminating Reciprocal Compensation Minutes	0	0
Line 3/Line 12	TY 2019 - 2020 Terminating Reciprocal Compensation Composite Rate	\$0.00	\$0.028720
Line 4/Line 13	TY 2019 - 2020 Originating Reciprocal Compensation Minutes	0	0
Line 5/Line 14	TY 2019 - 2020 Originating Reciprocal Compensation Composite Rate	\$0.00	\$0.028720
Line 6/Line 15	TY 2019 - 2020 Terminating Reciprocal Compensation Revenue	\$0.00	\$0.00
Line 7/Line 16	TY 2019 - 2020 Originating Reciprocal Compensation Expense	\$0.00	\$0.00
Line 8/Line 17	TY 2019 - 2020 Net Forecasted Reciprocal Compensation Revenue	\$0.00	\$0.00
Line 9/Line 18	TY 2019 - 2020 Net Reciprocal Compensation Revenue Requirement	\$0.00	\$0.00
Line 19/Line 20	Eligible Recovery	\$0.00	\$0.00
Line 19A/Line 20A	Downward Adjustments to FY2011 Net Reciprocal Compensation Received Revenue	\$0.00	\$0.00
Line 19B/Line 20B	Upward Adjustments to FY2011 Net Reciprocal Compensation Received Revenue	\$0.00	\$0.00
Line 21	Total Adjusted Reciprocal Compensation Eligible Recovery	\$0.00	\$0.00

(CMRS Data for Study Area 210331)

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Test Period 2019-2020 Lines Data

Test Year 2019-20 Single Line Business Lines

Test Year 2019-20 Multi-Line Business Lines

(Test Period Lines Data for Study Area 210331)

Exogenous Data

Telecommunications Relay Service
Increment

Regulatory-Fees Increment

NANPA Increment

Total Exogenous Costs

\$0.00

(Exogeneous Data for Study Area 210331)

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Test Period 2017-18 True-Up Data

	Study Area Forecasted Amount	Study Area Reported Amount	Difference [Reported - Forecasted]
1 TY 2017-2018 Allocated Interstate Access Revenue			
2 Total TY 2017-2018 Intrastate Terminating & Reciprocal Compensation Revenue			
3 Total TY 2017-2018 Intrastate Terminating Switched Access Service Revenue			
4 Total TY 2017-2018 Net Reciprocal Compensation Revenue	\$0.00	\$0.00	\$0.00
5 TY 2017-2018 Residential ARC Revenue			
6 TY 2017-2018 SLB ARC Revenue			
7 TY 2017-2018 MLB ARC Revenue			
8 TY 2017-2018 TRS Increment		N/A	
9 TY 2017-2018 Regulatory Fees Increment		N/A	
10 TY 2017-2018 NANPA Increment	\$0.00	N/A	
11 Total Exogenous Costs		\$0.00	
12 Net impact on Total Eligible Recovery			
13 TY 2017-2018 Eligible Recovery			
14 TY 2017-2018 CAFICC Support			

(TP 17-18 True-up Data for Study Area 210331)

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ARC Rates - Test Period 2019-2020 Pre-True-Up View

Exchange/Zone Name	Residential Lines excluding Lifelines	Residential ARC	Residential ARC Revenue	SLB ARC	SLB ARC Revenue	MLB ARC	MLB ARC Revenue	Total ARC Revenue
Indiantown		\$0.00	\$0.00					
Study Area Summary			\$0.00	\$3.00		\$3.00		
(Pre True-Up ARC Rates - for Study Area 210331)								

CAF ICC - Test Period 2019-2020 Pre-True-Up View

Line ID	Line Description	Study Area Amounts
10	Interstate Eligible Recovery	
20	Intrastate Eligible Recovery	
30	Reciprocal Compensation Eligible Recovery	\$0.00
40	Interstate Local Switching Support for Price Cap Affiliates or Estimated Duplicate LSS Costs in CAF II	\$0.00
50	Total Exogenous Costs	
60	Total Eligible Recovery	
80	Residential ARC Revenue at the FCC Prescribed Rate	\$0.00
90	SLB ARC Revenue at the FCC Prescribed Rate	
100	MLB ARC Revenue at the FCC Prescribed Rate	
110	Total ARC Revenue	
120	CAF ICC Support	
(Before TP 17-18 True-Up CAF ICC Data for Study Area 210331)		

REDACTED

ARC Rates - Test Period 2019-2020 Post-True-Up View

Exchange/Zone Name	Residential Lines excluding Lifelines	Residential ARC	Residential ARC Revenue	SLB ARC	SLB ARC Revenue	MLB ARC	MLB ARC Revenue	Total ARC Revenue
Indiantown		\$0.00	\$0.00					
Study Area Summary			\$0.00	\$3.00		\$3.00		

(Filing View (Post True-Up) ARC Rates - for Study Area 210331)

CAF ICC - Test Period 2019-2020 Post True-Up (Filing) View

Line ID	Line Description	Study Area Amounts
Test Period 2019-2020 Pre True-Up View		
10	Total Eligible Recovery (Pre-TrueUp)	
30	Residential ARC Revenue at FCC Prescribed Rate	\$0.00
40	SLB ARC Revenue at FCC Prescribed Rate	
50	MLB ARC Revenue at FCC Prescribed Rate	
60	Total ARC Revenue (Pre-TrueUp)	
70	CAFICC Support (Pre-TrueUp)	
Test Period 2017-2018 TrueUp		
80	Net Impact on Total Eligible Recovery	
Test Period 2019-2020 Filing (Post True-Up) View		
90	Total Eligible Recovery (Post-TrueUp)	
110	Residential ARC Revenue at FCC Prescribed Rate	\$0.00
120	SLB ARC Revenue at FCC Prescribed Rate	
130	MLB ARC Revenue at FCC Prescribed Rate	
140	Total ARC Revenue (Post-TrueUp)	
150	CAFICC Support (Post-TrueUp)	

(Filing view - After TP 17-18 True-Up CAF ICC Data for Study Area 210331)

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Revised CAF ICC Support with Imputed ARC Revenue for Consumer Broadband Loops

Broadband-only Residential Lines (Submitted at Exchange level)

Exchange/Zone (Plan) Name	Col A --	Col B --	Col C -- [A+B] Total Projected Residential Broadband-only New Lines for CBOL Support	Col D -- Residential ARC	Col F -- [A1*D*12+B1*E*12] Imputed Residential ARC Revenue
Indiantown Study Area Summary		0		\$0.00	\$0.00 \$0.00

Monthly Weighted Average of SLB and MLB ARC (Col K)=(SLB ARC Revenue + MLB ARC Revenue)/(SLB Lines + MLB Lines)/12 based on Voice-Data or lines

Broadband-only Business Lines Input Selection: Option A
Company submitted projected broadband-only SLB and MLB lines separately

Col G -- Projected SLB Broadband-only Lines	Col H -- SLB ARC	Col I -- [G*H*12] Imputed SLB ARC Revenue	Col J -- Projected MLB Broadband-only Lines	Col K -- MLB ARC	Col L -- [J*K*12] Imputed MLB ARC Revenue	Col P -- [F+I+L] Total Imputed ARC Revenue	Total Actual ARC revenue for TP 2015-16	Total Voice ARC Revenue for TP 2019-20
	\$3.00			\$3.00				

Line ID	Line Description	Source	Amount
10	Test Period 2019-2020 CAF ICC Support	Prepopulated (Line 150 (Post True-Up) on the Eligible Recovery and CAFICC screen)	
20	Total Test Period 2019-2020 Imputed ARC Revenue	Columns on the table above	
20A	Total Test Period 2019-2020 Imputed ARC Revenue following FCC 18-13	Revised ARC imputation following "Second Order on Reconsideration and Clarification" released on 2/16/2018.	
30	Adjusted Test Period 2019-2020 CAF ICC Support	Line 10 - Line 20A	

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 TELECOMMUNICATIONS SYSTEMS, INC.**

Signature of Authorized Officer or employee:

Bruce Russell

Digitally signed by Bruce Russell DN:cn=Bruce Russell, email=brucer@itsfiber.com, O=its telecommunications systems, inc., l=Indiantown FL 34956, Date:5/21/2019

Date: **5/21/2019**

Printed name of Authorized Officer or employee: **Bruce Russell**

Title or position of Authorized Officer or employee: **Vice President/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)

6/17/2019

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 TELECOMMUNICATIONS SYSTEMS, INC.</u></p>					
<p>Signature of Authorized Officer: <u>Bruce Russell</u></p>				<p>Digitally signed by Bruce Russell DN:cn=Bruce Russell, email=brucer@itsfiber.com, O=its telecommunications systems, inc., l=Indiantown FL 34956, Date:5/21/2019</p>	
<p>Date: <u>5/21/2019</u></p>					
<p>Printed name of Authorized Officer: <u>Bruce Russell</u></p>					
<p>Title or position of Authorized Officer: <u>Vice President/CFO</u></p>					
<p>Telephone number of authorized officer: <u>772-597-2106</u></p>					
Study Area Code of Reporting Carrier	210331		Filing Due Date for this form (mm/dd/yyyy)	6/17/2019	
<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 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 TELECOMMUNICATIONS SYSTEMS, INC.**

Signature of Authorized Officer:

Bruce Russell

Digitally signed by Bruce Russell DN:cn=Bruce Russell, email=brucer@itsfiber.com, o=its telecommunications systems, inc., l=Indiantown FL 34956, Date:5/21/2019

Date: **5/21/2019**

Printed name of Authorized Officer: **Bruce Russell**

Title or position of Authorized Officer: **Vice President/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)

6/17/2019

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.