



**ITS TELECOMMUNICATIONS SYSTEMS, INC.**

15925 SW Warfield Blvd. • P.O. Box 397 • Indiantown, Florida 34956  
772-597-2111 • [www.itsfiber.com](http://www.itsfiber.com)

February 15, 2019

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

Re: EB Docket No. 06-36 – Annual CPNI Certification for 2018

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 64.2009(e), ITS Telecommunications Systems, Inc. submits its Annual CPNI Certification for 2018.

If you should have any questions, please contact me at [brucer@itsfiber.com](mailto:brucer@itsfiber.com) or by telephone number (772) 597-2106.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bruce Russell".

Bruce Russell  
Vice President/CFO

Attachments

**ITS TELECOMMUNICATIONS SYSTEMS, INC.**

**P. O. Box 397, Indiantown, FL 34956 772-597-2111**

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018

Date filed: February 15, 2019

Name of Company Covered by this Certification:

499 Filer ID

ITS Telecommunications Systems, Inc.

811040

Name of signatory: Bruce A. Russell

Title of signatory: Vice President/CFO

I, Bruce Russell, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: \_\_\_\_\_



Bruce A. Russell, Vice President/CFO

Attachment: Accompanying Statement explaining CPNI procedures

**ITS TELECOMMUNICATIONS SYSTEMS, INC.**

**499 Filer ID 811040**

**P. O. Box 397, Indiantown, FL 34956 772-597-2111**

**2018 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE  
February 15, 2019**

This statement accompanies the Company's 2018 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

*All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.*

*As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.*

**1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

**2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

**5. Customer Notification and Authorization Process**

Prior to any planned use of CPNI for marketing, the Company has initiated the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding prohibitions on use of CPNI for marketing regarding the notice and approval requirements under Section 64.2008.

**6. Record of Customer CPNI Approval/Non-Approval**

The Company has established a system by which they can determine whether a customer has approved or disapproved of Company's release or use of CPNI prior to that information being used as required by Section 64.2009(a).

**7. Procedures Protecting Against Disclosure of CPNI**

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company has implemented procedures to notify customers of account changes.

**8. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable.      No actions taken against data-brokers.  
No customer complaints received.

**9. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

**10. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

**11. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.