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December 31, 2012

Mr. John Sohl
President/CEO
Federated States of Micronesia
Telecommunications Corporation

Dear Mr. Sohl:

In planning and performing our audit of the financial statements of the Federated States of Micronesia (FSM) Telecommunications Corporation (the Corporation) as of and for the year ended September 30, 2012 (on which we have issued our report dated December 31, 2012), in accordance with auditing standards generally accepted in the United States of America, the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, and 7 CFR Part 1773, *Policy on Audits of Rural Utilities Service (RUS) Borrowers*, we considered the Corporation's internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Corporation's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Corporation's internal control over financial reporting.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over financial reporting. However, in connection with our audit, we identified, and included in the attached Appendix I, deficiencies related to the Corporation's internal control over financial reporting and other matters as of September 30, 2012 that we wish to bring to your attention.

We have also issued a separate report to the Board of Directors, also dated December 31, 2012, on our consideration of the Corporation's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters.

The definition of a deficiency is also set forth in the attached Appendix I.

A description of the responsibility of management for establishing and maintaining internal control over financial reporting and of the objectives of and inherent limitations of internal control over financial reporting, is set forth in the attached Appendix II and should be read in conjunction with this report.

This report is intended solely for the information and use of the Board of Directors, management, others within the organization, and the Office of the FSM National Public Auditor and is not intended to be and should not be used by anyone other than these specified parties.

We will be pleased to discuss the attached comments with you and, if desired, to assist you in implementing any of the suggestions.

We wish to thank the staff and management of the Corporation for their cooperation and assistance during the course of this engagement.

Very truly yours,

SECTION I – DEFICIENCIES

We identified, and have included below, deficiencies involving the Corporation's internal control over financial reporting as of September 30, 2012 that we wish to bring to your attention:

1) Procedural Manual

Comment: The Corporation's printed procedural manual is outdated relative to system changes.

Recommendation: We recommend that the Corporation update the procedural manual and provide the revisions to all employees.

2) User Review Access

Comment: Several staff have full system access which should be based on the level of authority.

Recommendation: We recommend that the IT Department regularly perform reviews of user access based on the level of authority to establish that affected personnel have appropriate access.

3) Disaster Recovery Program

Comment: IT stores data online within the Corporation's server. However, the Corporation doesn't have an IT disaster recovery program that would provide for reliable back up if an unexpected event occurs.

Recommendation: We recommend that the Corporation implement an IT disaster recovery program to provide for the possibility that stored back-ups may be restored if an unexpected disaster occurs.

4) Uncollectible Reserve

Comment: No existing accounting policy defines procedures to set up uncollectible reserves for bad debts. We noted that different methodologies were used in the 2011 and 2012 computations.

Recommendation: We recommend that the Corporation establish a formal method for setting uncollectible reserves and that that method be periodically tested for continuing applicability.

5) Projects Under Construction (PUC)

Comment: Several projects were still open in the Capital Asset Registry as of September 30, 2012 though such were completed and placed in operation. Such were not properly assigned to a fixed asset account to be subject to depreciation. Thus, untimely transfer of PUC to particular fixed asset accounts understated depreciation expense. This matter was corrected through the audit process.

Recommendation: We recommend that the Corporation regularly monitor projects under construction to evaluate completion to allow for proper transfer to fixed asset accounts and to provide for accurate depreciation expense. Management may wish to inquire and consider factors that create long outstanding projects to facilitate timely resolution.

6) Prepaid Purchase Orders (PPO)

Comment: Several prepaid purchase orders were aged over a year. Some items had already been received but lacked supplier invoices. Others were subject to refund or were due from a bankrupt supplier which caused a delay in closing.

Recommendation: Management may wish to require requestors and project managers to regularly monitor PPO and provide updates to facilitate supplier compliance with expected delivery dates and to reduce risk of loss from unsettled prepayments.

SECTION II – DEFINITIONS

The definition of a deficiency that is established in AU 325, *Communicating Internal Control Related Matters Identified in an Audit*, is as follows:

A *deficiency* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A deficiency in design exists when (a) a control necessary to meet the control objective is missing or (b) an existing control is not properly designed so that, even if the control operates as designed, the control objective would not be met. A deficiency in operation exists when (a) a properly designed control does not operate as designed, or (b) the person performing the control does not possess the necessary authority or competence to perform the control effectively.

MANAGEMENT'S RESPONSIBILITY FOR, AND THE OBJECTIVES AND LIMITATIONS OF, INTERNAL CONTROL OVER FINANCIAL REPORTING

The following comments concerning management's responsibility for internal control over financial reporting and the objectives and inherent limitations of internal control over financial reporting are adapted from auditing standards generally accepted in the United States of America.

Management's Responsibility

The Corporation's management is responsible for the overall accuracy of the financial statements and their conformity with generally accepted accounting principles. In this regard, management is also responsible for establishing and maintaining effective internal control over financial reporting.

Objectives of Internal Control over Financial Reporting

Internal control over financial reporting is a process affected by those charged with governance, management, and other personnel and designed to provide reasonable assurance about the achievement of the entity's objectives with regard to reliability of financial reporting, effectiveness and efficiency of operations, and compliance with applicable laws and regulations. Internal control over the safeguarding of assets against unauthorized acquisition, use, or disposition may include controls related to financial reporting and operations objectives. Generally, controls that are relevant to an audit of financial statements are those that pertain to the entity's objective of reliable financial reporting (i.e., the preparation of reliable financial statements that are fairly presented in conformity with generally accepted accounting principles).

Inherent Limitations of Internal Control over Financial Reporting

Because of the inherent limitations of internal control over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may not be prevented or detected on a timely basis. Also, projections of any evaluation of the effectiveness of the internal control over financial reporting to future periods are subject to the risk that the controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.