SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

SCHEDULE 13D

Under the Securities Exchange Act of 1934 (Amendment No. 17)

| Communications Systems, Inc. (Name of Issuer) |
|---|
| Common Stock (Title of Class of Securities) |
| |
| David Goldman GAMCO Investors, Inc. |
| One Corporate Center |
| Rye, New York 10580-1435 |
| (914) 921-5000 |
| (Name, Address and Telephone Number of Person Authorized to Receive Notices and Communications) |
| |
| April 13, 2020 |
| (Date of Event which Requires Filing of this Statement) |

If the filing person has previously filed a statement on Schedule 13G to report the acquisition that is the subject of this Schedule 13D, and is filing this schedule because of $\S\S$ 240.13d-1(e), 240.13d-1(f) or 240.13d-1(g), check the following box .

1

| 1 | Names of reporting persons I.R.S. identification nos. of a | | y) | | |
|----|--|-----------------------------------|-------------------------------------|--|--|
| | Gabelli Funds, LLC | | I.D. No. 13-4044523 | | |
| 2 | Check the appropriate box | if a member of a group (SF | | | |
| | | | | | |
| | | | (b) | | |
| 3 | Sec use only | | | | |
| 4 | Source of funds (SEE INSTRUCTIONS) 00-Funds of investment advisory clients | | | | |
| 5 | Check box if disclosure of le | egal proceedings is required | ed pursuant to items 2 (d) or 2 (e) | | |
| 6 | Citizenship or place of orga New York | nization | | | |
| | Number Of | : 7 | Sole voting power | | |
| | Shares | : : | 307,000 (Item 5) | | |
| | Beneficially | : 8 | Shared voting power | | |
| | Owned | : : | None | | |
| | By Each | : 9 | Sole dispositive power | | |
| | Reporting | : : | 307,000 (Item 5) | | |
| | Person | <u>:</u> :10 | Shared dispositive power | | |
| | With | : : | None | | |
| 11 | Aggregate amount beneficia | : ally owned by each reportion | ng person | | |
| | 307,000 (Item 5) | | | | |
| 12 | Check box if the aggregate a (SEE INSTRUCTIONS) | amount in row (11) exclude | es certain shares | | |
| 13 | Percent of class represented | by amount in row (11) | | | |
| | 3.32% | | | | |
| 14 | Type of reporting person (S | EE INSTRUCTIONS) | | | |

CUSIP No. 203900105

| CUSIP | No. 203900105 | | |
|-------|---|----------------------------------|----------------------------------|
| 1 | Names of reporting persons | | |
| | I.R.S. identification nos. of a | bove persons (entities only) | |
| | GAMCO Asset Managemer | ıt Inc. | I.D. No. 13-4044521 |
| 2 | Check the appropriate box i | f a member of a group (SEE | INSTRUCTIONS) (a) |
| | | | |
| | | | (b) |
| 3 | Sec use only | | |
| 4 | Source of funds (SEE INSTI | RUCTIONS) | |
| | 00-Funds of investment adv | isory clients | |
| 5 | Check hoy if disclosure of le | gal proceedings is required n | oursuant to items 2 (d) or 2 (e) |
| J | Check box it disclosure of it | gai proceedings is required p | arsuant to items 2 (a) or 2 (c) |
| - | Cities and a second | | |
| 6 | Citizenship or place of organ New York | iization | |
| | Number Of | :7 | Sole voting power |
| | Shares | : : | 712,138 (Item 5) |
| | Beneficially | <u>:</u> : 8 | Shared voting power |
| | | : | Shared voting power |
| | Owned | : | None |
| | By Each | : 9 | Sole dispositive power |
| | Reporting | : : | 712,138 (Item 5) |
| | Person | <u>:</u> | |
| | 1 CI SUII | :10 · | Shared dispositive power |
| | With | : : | None |
| 1 | Aggregate amount heneficia | : lly owned by each reporting | nerson |
| - | | a, o act by each reporting | P***** |
| | 712,138 (Item 5) | | |
| 2 | | amount in row (11) excludes c | certain shares |
| | (SEE INSTRUCTIONS) | | |

13

14

7.69%

Percent of class represented by amount in row (11)

Type of reporting person (SEE INSTRUCTIONS) IA, CO

4.67%

Type of reporting person (SEE INSTRUCTIONS)

14

I.R.S. identification nos. of above persons (entities only)

Teton Advisors, Inc. I.D. No. 13-4008049 2 Check the appropriate box if a member of a group (SEE INSTRUCTIONS) (a) **(b)** Sec use only Source of funds (SEE INSTRUCTIONS) 00 - Funds of investment advisory clients Check box if disclosure of legal proceedings is required pursuant to items 2 (d) or 2 (e) Citizenship or place of organization Delaware Number Of :7 Sole voting power Shares 432,000 (Item 5) Beneficially : 8 **Shared voting power** Owned None By Each : 9 Sole dispositive power Reporting 432,000 (Item 5) Person :10 Shared dispositive power With None 11 Aggregate amount beneficially owned by each reporting person 432,000 (Item 5) 12 Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) 13 Percent of class represented by amount in row (11)

| 1 | No. 203900105 Names of reporting LR S. identification | g persons n nos. of above person | us (entities only) | | |
|---|--|-------------------------------------|---|-----|-------------------|
| | MJG Associates, In | | (change only) | LI |). No. 06-1304269 |
| 2 | | | of a group (SEE INSTRUCTIONS) | (a) | 1100 00 100 120 |
| | | | (b) | | |
| 3 | Sec use only | | | | |
| 4 | Source of funds (SI 00-Client Funds | EE INSTRUCTIONS) | | | |
| 5 | Check box if disclo | sure of legal proceedi | ings is required pursuant to items 2 (d) or 2 (e) | | |
| 6 | Citizenship or plac Connecticut | e of organization | | | |
| | | | | | |
| | Number Of | : 7 | Sole voting power | | |
| | Number Of Shares | : 7 : : | Sole voting power 9,000 (Item 5) | | |
| | | : 7 : : : : 8 | | | |
| | Shares | : : : | 9,000 (Item 5) | | |
| | Shares Beneficially | : : : | 9,000 (Item 5) Shared voting power | | |
| | Shares Beneficially Owned | : : : : 8 : : | 9,000 (Item 5) Shared voting power None | | |
| | Shares Beneficially Owned By Each | : : : : 8 : : | 9,000 (Item 5) Shared voting power None Sole dispositive power | | |

11 Aggregate amount beneficially owned by each reporting person

9,000 (Item 5)

Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) 12

13 Percent of class represented by amount in row (11)

0.10%

Type of reporting person (SEE INSTRUCTIONS)
CO 14

| USIP I | No. 203900105 Names of reporting persons | | | |
|--------|---|------------------------------|----------------------------------|--|
| • | I.R.S. identification nos. of a | | | |
| | Gabelli Foundation, Inc. | | I.D. No. 94-2975159 | |
| 2 | Check the appropriate box i | if a member of a group (SEI | INSTRUCTIONS) (a) | |
| | | | (b) | |
| 3 | Sec use only | | | |
| 4 | Source of funds (SEE INSTI WC | RUCTIONS) | | |
| 5 | Check box if disclosure of le | egal proceedings is required | pursuant to items 2 (d) or 2 (e) | |
| 6 | Citizenship or place of orga NV | nization | | |
| | Number Of | : 7 | Sole voting power | |
| | Shares | : : | 10,000 (Item 5) | |
| | Beneficially | <u>:</u> : 8 | Shared voting power | |
| | Owned | : : | None | |
| | By Each | <u>:</u> 9 | Sole dispositive power | |
| | Reporting | : : | 10,000 (Item 5) | |
| | Person | <u>:</u> :10 | Shared dispositive power | |
| | With | : : | None | |
| | | • | | |

10,000 (Item 5)

Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS)

Percent of class represented by amount in row (11)

0.11%

Type of reporting person (SEE INSTRUCTIONS) 00-Private Foundation

| | No. 203900105 Names of reporting persons | | |
|---|---|-------------------------------|---------------------------------------|
| 1 | I.R.S. identification nos. of a | above persons (entities only) | |
| | GGCP, Inc. | | I.D. No. 13-3056041 |
| 2 | Check the appropriate box i | f a member of a group (SEE | INSTRUCTIONS) (a) |
| | | | (b) |
| 3 | Sec use only | | |
| 4 | Source of funds (SEE INSTI None | RUCTIONS) | |
| 5 | Check box if disclosure of le | gal proceedings is required p | oursuant to items 2 (d) or 2 (e) |
| 6 | Citizenship or place of organ Wyoming | nization | |
| | Number Of | :7 | Sole voting power |
| | Shares | : | None (Item 5) |
| | Beneficially | : 8 | Shared voting power |
| | Owned | : : | None |
| | | <u>:</u> | |
| | By Each | : 9 | Sole dispositive power |
| | By Each Reporting | : 9 : : | Sole dispositive power None (Item 5) |
| | | : 9 : : : :10 | |
| | Reporting | : : : | None (Item 5) |

Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) $\, \mathbf{X} \,$

Percent of class represented by amount in row (11)

Type of reporting person (SEE INSTRUCTIONS) HC, CO

12

13

14

0.00%

| CUSIP | No. 203900105 | | | |
|-------|---------------------------------|-----------------------------------|----------------------------------|--|
| 1 | Names of reporting persons | | | |
| | I.R.S. identification nos. of a | ibove persons (entities only) | | |
| | GAMCO Investors, Inc. | | I.D. No. 13-4007862 | |
| | | if a member of a group (SEE | | |
| | | | | |
| | | | (b) | |
| | | | (6) | |
| 3 | Sec use only | | | |
| 4 | Source of funds (SEE INST) | RUCTIONS) | | |
| | None | , | | |
| 5 | Ch l- h 'f d'lfl- | 1 | oursuant to items 2 (d) or 2 (e) | |
| 5 | Check box ii disclosure of le | gai proceedings is required p | oursuant to items 2 (d) or 2 (e) | |
| | | | | |
| 6 | Citizenship or place of orga | nization | | |
| | Delaware | | | |
| | Number Of | : 7 | Sole voting power | |
| | | : | Service Service | |
| | Shares | : | None (Item 5) | |
| | Beneficially | <u>:</u> : 8 | Shared voting power | |
| | · | : | Shared voting power | |
| | Owned | : | None | |
| | By Each | <u>:</u> :9 | Sole dispositive power | |
| | • | : | Sole dispositive power | |
| | Reporting | : | None (Item 5) | |
| | Person | :10 | Shared dispositive power | |
| | **** | : | Shared dispositive power | |
| | With | : | None | |
| 11 | Aggragata amount hanaficia | : ally owned by each reporting | narcan | |
| ** | Aggregate amount beneficia | ny owned by each reporting | рстзоп | |
| | None (Item 5) | | | |
| | Charle base if the account of | | | |
| 12 | (SEE INSTRUCTIONS) X | amount in row (11) excludes o | certain shares | |
| 12 | (, | | | |
| | | | | |
| 13 | Percent of class represented | by amount in row (11) | | |
| | 2 2. cont of class represented | ~,vant in 1011 (11) | | |
| | 0.00% | | | |
| 14 | Type of reporting person (S | EE INSTRUCTIONS) | | |
| 17 | HC, CO | EE INSTRUCTIONS) | | |
| | -, | | | |

CUSIP No. 203900105
1 Names of reporting persons
I.R.S. identification nos. of above persons (entities only)

| Associated | Capital | Group. | Inc. |
|------------|---------|--------|------|
| | | | |

I.D. No. 47-3965991

(a)

Check the appropriate box if a member of a group (SEE INSTRUCTIONS)

| | | | (b) | |
|----|---|--------------------------------|--|--|
| 3 | Sec use only | | | |
| 4 | Source of funds (SE None | E INSTRUCTIONS) | | |
| 5 | Check box if disclos | ure of legal proceedi | ngs is required pursuant to items 2 (d) or 2 (e) | |
| 6 | Citizenship or place Delaware | of organization | | |
| | Number Of | : 7 | Sole voting power | |
| | Shares | : : | None (Item 5) | |
| | Beneficially | : 8 | Shared voting power | |
| | Owned | : : | None | |
| | By Each | : 9 | Sole dispositive power | |
| | Reporting | : : : | None (Item 5) | |
| | Person | :10 | Shared dispositive power | |
| | With | : : : | None | |
| 11 | Aggregate amount l | peneficially owned by | each reporting person | |
| | None (Item 5) | | | |
| 12 | Check box if the agg (SEE INSTRUCTION) | gregate amount in ro ONS) X | w (11) excludes certain shares | |
| 13 | Percent of class rep | resented by amount i | n row (11) | |
| | 0.00% | | | |
| 14 | Type of reporting p HC, CO | erson (SEE INSTRU | CTIONS) | |
| | | | | |

9

| | Mario J. Gabelli | | | |
|---|---|---|---|--|
| , | | ata hay if a mambar of | a group (SEE INSTRUCTIONS) | |
| 2 | Check the appropris | ate box ii a illelliber of | a group (SEE INSTRUCTIONS) (a) | |
| | | | | |
| | | | (b) | |
| | | | (8) | |
| 3 | Sec use only | | | |
| 4 | Source of funds (SE | E INSTRUCTIONS) | | |
| | None | , | | |
| 5 | Chack how if disales | ura of lagal proceeding | gs is required pursuant to items 2 (d) or 2 (e) | |
| 3 | CHECK DOX II UISCIOS | ure or regar proceeding | 25 15 1 Equil Eu pui Suant (O REIIIS 2 (U) OI 2 (E) | |
| | | | | |
| 6 | Citizenship or place USA | of organization | | |
| | USA | | | |
| | | | | |
| | Number Of | : 7 | Sole voting power | |
| | | : 7 : | | |
| | Shares | : 7 : : : | Sole voting power None (Item 5) | |
| | | : 7 : : : : : 8 | | |
| | Shares | : : : | None (Item 5) | |
| | Shares Beneficially Owned | : : : 8 : : | None (Item 5) Shared voting power None | |
| | Shares Beneficially | : : : | None (Item 5) Shared voting power | |
| | Shares Beneficially Owned | : : : 8 : : | None (Item 5) Shared voting power None Sole dispositive power | |
| | Shares Beneficially Owned By Each Reporting | : : : : 8 : : : : : 9 : : | None (Item 5) Shared voting power None Sole dispositive power None (Item 5) | |
| | Shares Beneficially Owned By Each | : : : 8 : : | None (Item 5) Shared voting power None Sole dispositive power | |
| | Shares Beneficially Owned By Each Reporting | : : : : 8 : : : : : 9 : : | None (Item 5) Shared voting power None Sole dispositive power None (Item 5) | |

10

Check box if the aggregate amount in row (11) excludes certain shares (SEE INSTRUCTIONS) X

Percent of class represented by amount in row (11)

Type of reporting person (SEE INSTRUCTIONS)
IN

12

13

14

0.00%

Item 1. <u>Security and Issuer</u>

This Amendment No. 17 to Schedule 13D on the Common Stock of Communications Systems, Inc. (the "Issuer") is being filed on behalf of the undersigned to amend the Schedule 13D, as amended (the "Schedule 13D"), which was originally filed on May 13, 2013. Unless otherwise indicated, all capitalized terms used herein but not defined herein shall have the same meanings as set forth in the Schedule 13D.

Item 2. <u>Identity and Background</u>

Item 2 to Schedule 13D is amended, in pertinent part, as follows:

This statement is being filed by Mario J. Gabelli ("Mario Gabelli") and various entities which he

directly or indirectly controls or for which he acts as chief investment officer. These entities, except for LICT Corporation ("LICT) and CIBL, Inc. ("CIBL"), engage in various aspects of the securities business, primarily as investment adviser to various institutional and individual clients, including registered investment companies and pension plans, and as general partner or the equivalent of various private investment partnerships or private funds and as a registered broker-dealer. Certain of these entities may also make investments for their own accounts.

The foregoing persons in the aggregate often own beneficially more than 5% of a class of equity securities of a particular issuer. Although several of the foregoing persons are treated as institutional investors for purposes of reporting their beneficial ownership on the short-form Schedule 13G, the holdings of those who do not qualify as institutional investors may exceed the 1% threshold presented for filing on Schedule 13G or implementation of their investment philosophy may from time to time require action which could be viewed as not completely passive. In order to avoid any question as to whether their beneficial ownership is being reported on the proper form and in order to provide greater investment flexibility and administrative uniformity, these persons have decided to file their beneficial ownership reports on the more detailed Schedule 13D form rather than on the short-form Schedule 13G and thereby to provide more expansive disclosure than may be necessary.

(a), (b) and (c) - This statement is being filed by one or more of the following persons: GGCP, Inc. ("GGCP"), GGCP Holdings LLC ("GGCP Holdings"), GAMCO Investors, Inc. ("GBL"), Associated Capital Group, Inc. ("AC"), Gabelli Funds, LLC ("Gabelli Funds"), GAMCO Asset Management Inc. ("GAMCO"), Teton Advisors, Inc. ("Teton Advisors"), Gabelli & Company Investment Advisers, Inc. ("GCIA"), Morgan Group Holding Co., ("MGH"), G.research, LLC ("G.research"), MJG Associates, Inc. ("MJG Associates"), Gabelli Foundation, Inc. ("Foundation"), Mario Gabelli, LICT and CIBL. Those of the foregoing persons signing this Schedule 13D are hereinafter referred to as the "Reporting Persons".

GGCP makes investments for its own account and is the manager and a member of GGCP Holdings which is the controlling shareholder of GBL and AC. GBL, a public company listed on the New York Stock Exchange, is the parent company for a variety of companies engaged in the securities business, including certain of those named below. AC, a public company listed on the New York Stock Exchange, is the parent company for a variety of companies engaged in the securities business, including certain of those listed below.

GAMCO, a wholly-owned subsidiary of GBL, is an investment adviser registered under the Investment Advisers Act of 1940, as amended ("Advisers Act"). GAMCO is an investment manager providing discretionary managed account services for employee benefit plans, private investors, endowments, foundations and others.

GCIA, a wholly owned subsidiary of AC, is an investment adviser registered under the Advisers Act and serves as a general partner or investment manager to limited partnerships and offshore investment companies and other accounts. As a part of its business, GCIA may purchase or sell securities for its own account. GCIA is a general partner or investment manager of a number of funds or partnerships, including Gabelli Associates Fund, L.P., Gabelli Associates Fund II, L.P., Gabelli Associates Limited, Gabelli Associates Limited, Gabelli Associates Limited, Gabelli Capital Structure Arbitrage Fund L.P., Gabelli Capital Structure Arbitrage Fund Limited, Gabelli Intermediate Credit Fund L.P., GAMA Select Energy + L.P., GAMCO Medical Opportunities L.P., and Gabelli Multimedia Partners, L.P.

G.research is a wholly owned subsidiary of MGH. MGH in turn is controlled by AC through an 83% ownership interest. G.research, is a broker-dealer registered under the Securities Exchange Act of 1934, as amended ("1934 Act"), which as a part of its business regularly purchases and sells securities for its own account.

Gabelli Funds, a wholly owned subsidiary of GBL, is a limited liability company. Gabelli Funds is an investment adviser registered under the Advisers Act which provides advisory services for The Gabelli Equity Trust Inc., The Gabelli Asset Fund, The Gabelli Growth Fund, The Gabelli Convertible and Income Securities Fund Inc., The Gabelli Value 25 Fund Inc., The Gabelli Small Cap Growth Fund, The Gabelli Equity Income Fund, The Gabelli ABC Fund, The Gabelli Global Content & Connectivity Fund, The Gabelli Gold Fund, Inc., The Gabelli Multimedia Trust Inc., The Gabelli Global Rising Income & Dividend Fund, The Gabelli Capital Asset Fund, The Gabelli International Growth Fund, Inc., The Gabelli Global Growth Fund, The Gabelli Utility Trust, The Gabelli Utility Fund, The Gabelli Dividend Growth Fund, The Gabelli Focus Five Fund, The Comstock Capital Value Fund, The Gabelli Dividend and Income Trust, The Gabelli Global Utility & Income Trust, The GAMCO Global Gold, Natural Resources, & Income Trust, The Gabelli Healthcare & Wellness Rx Trust, The Gabelli Enterprise Mergers & Acquisitions Fund, The Gabelli ESG Fund, Inc., The Gabelli Healthcare & Wellness Rx Trust, The Gabelli Global Small and Mid Cap Value Trust, Gabelli Value Plus+ Trust, Gabelli Merger Plus+ Trust Plc, The Gabelli Global Financial Services Fund, The Gabelli Global Mini Mites Fund, The Gabelli Go Anywhere Trust, The Gabelli Mogul Fund, The Gabelli Pet Parents' Fund, The Gabelli U.S. Treasury Money Market Fund, Bancroft Fund Ltd. and Ellsworth Growth & Income Fund Ltd. (collectively, the "Funds"), which are registered investment companies. Gabelli Funds is also the investment adviser to The GAMCO International SICAV (sub-funds GAMCO Merger Arbitrage and GAMCO All Cap Value), a UCITS III vehicle.

Teton Advisors, an investment adviser registered under the Advisers Act, provides discretionary advisory services to The TETON Westwood Mighty Mites* Fund, The TETON Westwood Income Fund, The TETON Westwood SmallCap Equity Fund, TETON Westwood Intermediate Bond Fund, and The TETON Westwood Mid-Cap Equity Fund.

MJG Associates provides advisory services to private investment partnerships and offshore funds. Mario Gabelli is the sole shareholder, director and employee of MJG Associates. MJG Associates is the Investment Manager of Gabelli International Limited and Gabelli Fund, LDC. Mario J. Gabelli is the general partner of Gabelli Performance Partnership, LP.

The Foundation is a private foundation. Mario Gabelli is the Chairman, a Trustee and the Investment Manager of the Foundation. Elisa M. Wilson is the President of the Foundation.

LICT is a holding company with operating subsidiaries engaged primarily in the rural telephone industry. LICT actively pursues new business ventures and acquisitions. LICT makes investments in marketable securities to preserve capital and maintain liquidity for financing their business activities and acquisitions and are not engaged in the business of investing, or trading in securities. Mario J. Gabelli is the Chief Executive Officer, a director, and substantial shareholder of LICT.

CIBL is a holding company with interests in telecommunications operations, primarily in the rural telephone industry. CIBL actively pursues new business ventures and acquisitions. CIBL makes investments in marketable securities to preserve capital and maintain liquidity for financing their business activities and acquisitions and are not engaged in the business of investing, or trading in securities. Mario J. Gabelli is a director, and substantial shareholder of CIBL.

Mario Gabelli is the controlling stockholder, Chief Executive Officer and a director of GGCP and Chairman and Chief Executive Officer of GBL. He is the Executive Chairman of AC. Mario Gabelli is also a member of GGCP Holdings. Mario Gabelli is the controlling shareholder of Teton.

The Reporting Persons do not admit that they constitute a group.

GAMCO is a New York corporation and GBL, MGH and Teton Advisors are Delaware corporations, each having its principal business office at One Corporate Center, Rye, New York 10580. GGCP is a Wyoming corporation and AC and GCIA are Delaware corporations each having its principal business office 191 Mason Street, Greenwich, CT 06830. GGCP Holdings is a Delaware limited liability corporation having its principal business office at 191 Mason Street, Greenwich, CT 06830. G.research is a Delaware limited liability company having its principal officers at One Corporate Center, Rye, New York 10580. Gabelli Funds is a New York limited liability company having its principal business office at One Corporate Center, Rye, New York 10580. MJG Associates is a Connecticut corporation having its principal business office at 191 Mason Street, Greenwich, CT 06830. The Foundation is a Nevada corporation having its principal offices at 165 West Liberty Street, Reno, Nevada 89501. LICT is a Delaware corporation having its principal place of business as 165 West Liberty Street, Suite 220, Reno, NV 89501.

For information required by instruction C to Schedule 13D with respect to the executive officers and directors of the foregoing entities and other related persons (collectively, "Covered Persons"), reference is made to Schedule I annexed hereto and incorporated herein by reference.

- (d) Not applicable.
- (e) Not applicable.
- (f) Reference is made to Schedule I hereto.

Item 3. <u>Source and Amount of Funds or Other Consideration</u>

Item 3 to Schedule 13D is amended, in pertinent part, as follows:

The Reporting Persons used an aggregate of approximately \$177,814 to purchase the additional Securities reported as beneficially owned in Item 5 since the most recent filing on Schedule 13D. GAMCO used approximately \$158,904 of funds that were provided through the accounts of certain of their investment advisory clients (and, in the case of some of such accounts at GAMCO, may be through borrowings from client margin accounts) in order to purchase the additional Securities for such clients.

Foundation used approximately \$19,720 of funds of a private entity to purchase the additional Securities reported by it.

Item 4. <u>Purpose of Transaction</u>

Item 4 to Schedule 13D is amended, in pertinent part, as follows:

On January 28, 2020, GAMCO, on behalf of its investment advisory clients, announced its intent to nominate Mr. Michael R. Zapata for election as a director to the Issuer's Board of Directors (the "Board") at the Issuer's 2020 Annual Meeting of Shareholders ("2020 Annual Meeting").

On April 13, 2020, the Issuer announced, among other things, that its Board will nominate Mr. Zapata for election as a director at the Issuer's 2020 Annual Meeting, scheduled for June 17, 2020.

GAMCO believes that the election of Mr. Zapata will add value to the Issuer's Board.

Item 5. <u>Interest In Securities Of The Issuer</u>

Item 5 to Schedule 13D is amended, in pertinent part, as follows:

(a) The aggregate number of Securities to which this Schedule 13D relates is 1,470,138 shares, representing 15.88% of the 9,256,298 shares outstanding as reported in the Issuer's most recently filed Form 10-K for the fiscal year ended December 31, 2019. The Reporting Persons beneficially own those Securities as follows:

| Name | Shares of Common Stock | % of Class of Common | |
|----------------|---------------------------|-------------------------|--|
| GAMCO | 712,138 | 7.69% | |
| Gabelli Funds | 307,000 | 3.32% | |
| Teton Advisors | 432,000 | 4.67% | |
| MJG Associates | 9,000 | 0.10% | |
| Foundation | 10.000 | 0.11% | |

Mario Gabelli is deemed to have beneficial ownership of the Securities owned beneficially by each of the foregoing persons. GCIA is deemed to have beneficial ownership of the Securities owned beneficially by G.research. AC, GBL and GGCP are deemed to have beneficial ownership of the Securities owned beneficially by each of the foregoing persons other than Mario Gabelli and the Foundation.

- (b) Each of the Reporting Persons and Covered Persons has the sole power to vote or direct the vote and sole power to dispose or to direct the disposition of the Securities reported for it, either for its own benefit or for the benefit of its investment clients or its partners, as the case may be, except that (i) Gabelli Funds has sole dispositive and voting power with respect to the shares of the Issuer held by the Funds so long as the aggregate voting interest of all joint filers does not exceed 25% of their total voting interest in the Issuer and, in that event, the Proxy Voting Committee of each Fund shall respectively vote that Fund's shares, (ii) at any time, the Proxy Voting Committee of each such Fund may take and exercise in its sole discretion the entire voting power with respect to the shares held by such fund under special circumstances such as regulatory considerations, and (iii) the power of Mario Gabelli, AC, GBL, and GGCP is indirect with respect to Securities beneficially owned directly by other Reporting Persons.
- (c) Information with respect to all transactions in the Securities which were effected during the past sixty days or since the most recent filing on Schedule 13D, whichever is less, by each of the Reporting Persons and Covered Persons is set forth on Schedule II annexed hereto and incorporated herein by reference.
 - (e) Not applicable.

Signature

After reasonable inquiry and to the best of my knowledge and belief, I certify that the information set forth in this statement is true, complete and correct.

Dated: April 13, 2020

GGCP, INC. MARIO J. GABELLI MJG ASSOCIATES, INC. GABELLI FOUNDATION, INC.

By:/s/ David Goldman David Goldman Attorney-in-Fact

GABELLI FUNDS, LLC TETON ADVISORS, INC.

By:/s/ <u>David Goldman</u>
David Goldman
General Counsel – Gabelli Funds, LLC
Counsel – Teton Advisors, Inc.

GAMCO INVESTORS, INC.

By:/s/ Kevin Handwerker Kevin Handwerker

General Counsel & Secretary - GAMCO Investors, Inc.

ASSOCIATED CAPITAL GROUP, INC. GAMCO ASSET MANAGEMENT INC.

By:/s/ Douglas R. Jamieson

Douglas R. Jamieson
President & Chief Executive Officer – Associated Capital
Group, Inc.
President – GAMCO Asset Management Inc.

SCHEDULE I

Information with Respect to Executive Officers and Directors of the Undersigned

Schedule I to Schedule 13D is amended, in pertinent part, as follows:

The following sets forth as to each of the executive officers and directors of the undersigned: his name; his business address; his present principal occupation or employment and the name, principal business and address of any corporation or other organization in which such employment is conducted. Unless otherwise specified, the principal employer of each such individual is GAMCO Asset Management Inc., Gabelli Funds, LLC, Gabelli & Company Investment Advisers, Inc., Gresearch, LLC, Teton Advisors, Inc., Associated Capital Group, Inc. or GAMCO Investors, Inc., the business address of each of which is One Corporate Center, Rye, New York 10580, and each such individual identified below is a citizen of the United States. To the knowledge of the undersigned, during the last five years, no such person has been convicted in a criminal proceeding (excluding traffic violations or similar misdemeanors), and no such person was a party to a civil proceeding of a judicial or administrative body of competent jurisdiction as a result of which he was or is subject to a judgment, decree or final order enjoining future violations of, or prohibiting or mandating activities subject to, federal or state securities law or finding any violation with respect to such laws except as reported in Item 2(d) and (e) of this Schedule 13D.

Directors:

Edwin L. Artzt Former Chairman and Chief Executive Officer

> Procter & Gamble Company 900 Adams Crossing Cincinnati, OH 45202

Raymond C. Avansino Chairman & Chief Executive Officer

> E.L. Wiegand Foundation 165 West Liberty Street Reno, NV 89501

Leslie B. Daniels Operating Partner

> AE Industrial Partners, LP 2500 N. Military Trail, Suite 470 Boca Raton, FL 33431

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer of GGCP, Inc.

Chairman & Chief Executive Officer of GAMCO Investors, Inc.

Executive Chairman of Associated Capital Group, Inc.

Director/Trustee of all registered investment companies advised by Gabelli Funds, LLC.

Director

c/o GAMCO Investors, Inc. Elisa M. Wilson One Corporate Center

Rye, NY 10580

Former Chairman and Chief Executive Officer Eugene R. McGrath

> Consolidated Edison, Inc. 4 Irving Place New York, NY 10003

Robert S. Prather President & Chief Executive Officer

> Heartland Media, LLC 1843 West Wesley Road Atlanta, GA 30327

Officers:

Mario J. Gabelli Chairman and Chief Executive Officer

Henry G. Van der Eb Senior Vice President Bruce N. Alpert Senior Vice President Agnes Mullady Senior Vice President

Kevin Handwerker Executive Vice President, General Counsel and Secretary

Kieran Caterina Chief Accounting Officer

GAMCO Asset Management Inc.

Directors:

Douglas R. Jamieson Regina M. Pitaro

Officers:

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer - Value Portfolios

Douglas R. Jamieson President, Chief Operating Officer and Managing Director

David Goldman General Counsel, Secretary & Chief Compliance Officer

Gabelli Funds, LLC

Officers:

Mario J. Gabelli Chief Investment Officer - Value Portfolios

Executive Vice President and Chief Operating Officer Bruce N. Alpert

President and Chief Operating Officer - Open End Fund Division Agnes Mullady

David Goldman General Counsel

Gabelli Foundation, Inc.

Officers:

Mario J. Gabelli Chairman, Trustee & Chief Investment Officer

Elisa M. Wilson President

Marc Gabelli Trustee

Matthew R. Gabelli Trustee

Michael Gabelli Trustee

GGCP, Inc.

Directors:

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer of GGCP, Inc.

Chairman & Chief Executive Officer of GAMCO Investors, Inc.

Executive Chairman of Associated Capital Group, Inc.

Director/Trustee of all registered investment companies advised by Gabelli Funds, LLC.

Marc Gabelli President – GGCP, Inc.

Matthew R. Gabelli Vice President – Trading

G.research, LLC One Corporate Center Rye, NY 10580

Michael Gabelli President & COO

Gabelli & Partners, LLC One Corporate Center Rye, NY 10580

Frederic V. Salerno Chairman

Former Vice Chairman and Chief Financial Officer

Verizon Communications

Vincent S. Tese Executive Chairman – FCB Financial Corp

Elisa M. Wilson Director

Officers:

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer

Marc Gabelli President

Silvio A. Berni Chief Financial and Accounting Officer, Vice President Corporate Development and Controller, Assistant

Secretary

GGCP Holdings LLC

Members:

GGCP, Inc. Manager and Member

Mario J. Gabelli Member

Teton Advisors, Inc.

Directors:

Marc Gabelli Executive Chairman

Vincent J. Amabile Founder- Amabile Partners

Stephen G. Bondi, CPA Chief Financial Officer – Mittleman Brothers, LLC

Aaron J. Feingold, M.D. President and Founder – Raritan Bay Cardiology Group

Nicholas F. Galluccio Chief Executive Officer and President

Kevin M. Keeley President & Executive Chairman – Keeley Teton Advisors, LLC

John M. Tesoro, CPA Retired Partner – KPMG LLP

Officers:

Nicholas F. Galluccio See above

Patrick B. Huvane, CPA, CFA Chief Financial Officer

Deanna B. Marotz Chief Compliance Officer

Associated Capital Group, Inc.

Directors:

Mario J. Gabelli Chief Executive Officer and Chief Investment Officer of GGCP, Inc.

Chairman & Chief Executive Officer of GAMCO Investors, Inc.

Executive Chairman of Associated Capital Group, Inc.

Director/Trustee of all registered investment companies advised by Gabelli Funds, LLC.

Marc Gabelli President – GGCP, Inc.

Douglas R. Jamieson President and Chief Executive Officer

Bruce Lisman Former Chairman - JP Morgan - Global Equity Division

Daniel R. Lee Chief Executive Officer

Full House Resorts, Inc.

4670 South Ford Apache Road, Suite 190

Las Vegas, NV 89147

Salvatore F. Sodano Vice Chairman – Broadridge Financial Solutions

Frederic V. Salerno See above

Elisa M. Wilson Director

Officers:

Mario J. Gabelli Executive Chairman

Douglas R. Jamieson President and Chief Executive Officer

Kenneth D. Masiello Chief Accounting Officer

Kevin Handwerker Executive Vice President, General Counsel and Secretary

David Fitzgerald Assistant Secretary

Gabelli & Company Investment Advisers, Inc.

Directors:

Douglas R. Jamieson

Officers:

Douglas R. Jamieson Chief Executive Officer and President

John Givissis Controller

Kevin Handwerker Secretary

David Fitzgerald Assistant Secretary

G.research, LLC

Officers:

Cornelius V. McGinity Office of the Chairman

Vincent Amabile President

Bruce N. Alpert Vice President

Douglas R. Jamieson Secretary

Kevin Handwerker Assistant Secretary
David Fitzgerald Assistant Secretary

David Goldman Assistant Secretary

SCHEDULE II INFORMATION WITH RESPECT TO TRANSACTIONS EFFECTED DURING THE PAST SIXTY DAYS OR SINCE THE MOST RECENT FILING ON SCHEDULE 13D (1) SHARES PURCHASED AVERAGE DATE SOLD(-) PRICE(2)

COMMON STOCK-COMMUNICATIONS SYSTEMS INC.

GABELLI FOUNDATION, INC.

3/16/20 4,000 4,9300 GAMCO ASSET MANAGEMENT INC. . 3/31/20 200- *DO 3/27/20 5,514 4.5442 3/26/20 24,000 4.7832

- (1) UNLESS OTHERWISE INDICATED, ALL TRANSACTIONS WERE EFFECTED ON THE NASDAQ.
- (2) PRICE EXCLUDES COMMISSION.
- (*) RESULTS IN CHANGE OF DISPOSITIVE POWER AND BENEFICIAL OWNERSHIP.