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August 14, 2014

Florida Public Service Commission  
Attn: Ms. Carlotta S. Stauffer  
Office of the Commission Clerk  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

Via Overnight Mail

**REDACTED**

RECEIVED-FPSC  
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COMMISSION  
CLERK

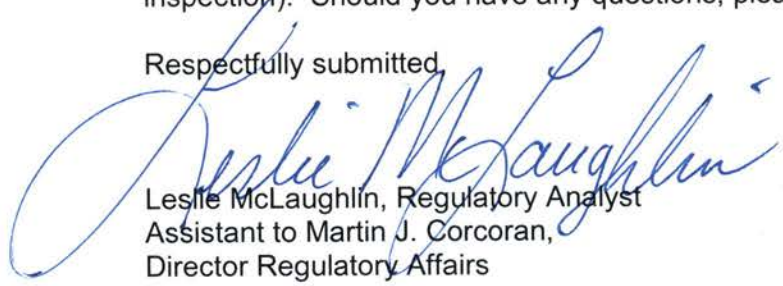
Re: Cox Florida Telcom, L.P.  
CLEC No. TA027  
2014 Annual CLEC and Wireless Lifeline Data Request

Dear Ms. Stauffer:

Enclosed pursuant to Chapter 364.10 of the Florida Statutes, please find the response of Cox Florida Telcom, L.P., d/b/a "Cox," "Cox Communications ("Cox") to the Florida Public Service Commission's 2014 CLEC and Wireless Lifeline Data Request.

Pursuant to Section 364.183(1) of the Florida Statutes, Cox respectfully claims that the highlighted portions of this Report, namely information in Question 1, contain proprietary and confidential business information, and therefore Cox files this claim of confidentiality pursuant to Rule 25-22.006(5), F.A.C. Accordingly, as required, we enclose one highlighted original copy of our response (to be held as confidential and not to be disclosed), along with two redacted copies (for public inspection). Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

  
Leslie McLaughlin, Regulatory Analyst  
Assistant to Martin J. Corcoran,  
Director Regulatory Affairs

Enclosures

cc: Mr. Bob Casey, Office of Telecommunications  
Ms. Beth W. Salak, Director

COM \_\_\_\_\_  
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**CLEC AND WIRELESS LIFELINE DATA REQUEST 2014**  
**PUBLIC COPY**

To assist the Public Service Commission (PSC) in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **staff requests that you provide responses to the following by August 15, 2014.**

**For items 1 through 16, please provide the data for the fiscal year July 1, 2013, through June 30, 2014.**

**For those items requesting that the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.**

1. The number of residential access lines in service each month. \*

**Response:**

Month	# of Residential Access Lines
July 2013	██████████
August 2013	██████████
September 2013	██████████
October 2013	██████████
November 2013	██████████
December 2013	██████████
January 2014	██████████
February 2014	██████████
March 2014	██████████
April 2014	██████████
May 2014	██████████
June 2014	██████████

**\* These lines represent Primary Lines only.**

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

**Response:**

Cox Florida Telcom, L.P.  
 CLEC and WIRELESS Lifeline Data Request 2014  
 August 14, 2014

Month	# of Customers
July 2013	55
August 2013	75
September 2013	86
October 2013	100
November 2013	105
December 2013	114
January 2014	120
February 2014	234
March 2014	349
April 2014	452
May 2014	442
June 2014	522

- The amount of Lifeline credit provided to Lifeline customers on a monthly billing.

**Response:**

Cox Lifeline customers receive a discount that includes (1) a waiver of the \$7.00 FCC Access Charge and (2) a reduction of the Basic Monthly Service rate for telephone, currently from \$15.99 to \$8.99. Cox customers' total Lifeline discount is \$14.00.

- The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).

**Response:**

Within this reporting period, the total number of customers denied Lifeline service was 235. The reasons were as follows: applicant did not reside within Cox's service area; applicant was not in Cox's database; applicant's service had been disconnected; applicant failed to verify eligibility by either program participation or income qualification; applicant's name was not listed as an authorized user on the subscriber account; applicant did not submit a completed application; applicant stated that household already had existing service with a Lifeline provider; or applicant's information did not pass NLAD verification when submitted..

- The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

**Response:**



Cox Florida Telcom, L.P.  
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Month	# New Lifeline Customers Added
July 2013	15
August 2013	21
September 2013	17
October 2013	17
November 2013	11
December 2013	10
January 2014	10
February 2014	129
March 2014	128
April 2014	125
May 2014	26
June 2014	112

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold access lines, or Lifeline customers moved to Transitional Lifeline.

**Response:**

Month	# Removed from Lifeline
July 2013	2
August 2013	2
September 2013	5
October 2013	4
November 2013	6
December 2013	1
January 2014	8
February 2014	8
March 2014	16
April 2014	26
May 2014	37
June 2014	44

7. The number of customers participating in Transitional Lifeline each month.

**Response:**

Month	# Customers receiving Transitional Lifeline
July 2013	0
August 2013	0
September 2013	0
October 2013	0
November 2013	0
December 2013	0
January 2014	0
February 2014	0
March 2014	0
April 2014	0
May 2014	0
June 2014	0

8. The number of customers participating in Lifeline under the Tribal Lands provision each month.

**Response:** Not Applicable.

9. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

**Response:** Not Applicable.

10. Description of your company's procedures for enrolling customers in the Lifeline program Include the following in your response:

- a. Procedures used to process applications received from the Office of Public Counsel.

**Response:**

As a local exchange service provider with less than 1 million access lines under Section 364.10, Cox's Lifeline operational team do not receive applications

directly from the Office of Public Counsel, but has provided contact information to the OPC.

- b. Procedures used to process applications received directly from customers.

**Response:**

Cox receives applications mailed, faxed, or submitted in person at Cox Retail Stores by Lifeline applicants. Cox's Lifeline Operations team reviews all applications to ensure valid proof of either (1) participation in the qualifying federal/state-established benefit programs, or (2) eligibility by income, based upon household gross annual income not exceeding 150% of the current Federal Poverty Guidelines. Cox then enters each applicant into the NLAD database as required by USAC. Once the customer is cleared via NLAD, the Lifeline discount code is placed on the applicant's account.

Applicants must provide the following information in their application:

- (1) The last 4 digits of the subscriber's Social Security Number
- (2) Subscriber's Date of Birth.
- (3) Initialed acknowledgement and acceptance of the National Lifeline Accountability Database Disclosure and Consent.
- (4) Initialed acknowledgement of federally required Lifeline disclosure information.
- (5) Verification that there is currently no other Lifeline assistance being received in the applicant's household (i.e. economic unit).

- c. Procedures used to process applications received through the PSC on-line process.

**Response:**

An email notification is sent to Cox's Lifeline Operations team mailbox by the Florida Public Service Commission when there are pre-qualified Lifeline applications available. When Cox's team receives an email, the text file is retrieved from the FPSC secure application site by a team member. Once the applicant's information is and reviewed, Cox enters the applicant's information into the NLAD database as required by USAC. Once the customer is cleared via NLAD, the Lifeline discount code is applied to the customer accounts.

- d. Procedures used to process applications received through the Department of Children and Families coordinated enrollment process.

**Response:**

Cox receives pre-verified applicant information via the FPSC approval process.

- e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

**Response:**

Cox's Lifeline operations team is committed to a 'same day' process. The Lifeline discount code is applied to the account upon receipt of a valid Lifeline application, effective as of the date verified. The discounted rate appears on the next bill.

11. Description of your company's procedures for performing continued verification of customer eligibility after initial certification. Include the following in your response:

- a. Time period between initial certification and verification.

**Response:**

Cox utilizes USAC's annual verification procedures. The 2014 recertification is currently underway, and USAC is in the process of validating all customers as of the February 2014 Data Month.

- b. Method(s) used to verify customer eligibility.

**Response:**

Same as above. Upon completion of USAC's recertification results, Cox will either retain or de-enroll customers based on USAC's determination of either continued eligibility or of ineligibility, respectively.

- c. Frequency of periodic verification.

**Response:**

Same as (a) above: Cox will recertify yearly with USAC on an annual basis.

12. Description of your company's procedures for promoting Lifeline. Include the following in your response:

- a. Internal procedures for promoting Lifeline.



**Response:**

Customer-facing representatives receive initial training, in addition to having the resources of a permanent electronic Cox Telephone training database. Additionally, representatives receive periodic Lifeline advisories and job aids as a refresher.

- b. Outreach and educational efforts involving participation in community events.

**Response:**

Cox's marketing department sends periodic direct mailings to customers regarding the availability of Lifeline.

- c. Outreach and educational efforts involving mass media (newspaper, radio, television).

**Response:** None currently.

- d. Copies of Lifeline outreach materials of your company.

**Response:** See Attachment 12-d.

- e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

**Response:** None currently.

- 13. Description of procedures associated with enrollment of Lifeline customers by resellers of telecommunications services through resale agreements. . Include the following in your response:

- a. Billing procedures associated with the pass through of the credit, including the amount of the pass through for each reseller.

**Response:** Not Applicable.

- b. Initial and annual certification procedures and requirements.

**Response:** Not Applicable.

- c. Any other terms and conditions applicable to resellers offering Lifeline that are not imposed on resellers who do not offer Lifeline.

**Response:** Not Applicable.



14. Please describe the training you provide to your customer service representatives regarding Lifeline and provide the script used by your company's representatives.

**Response:**

New customer service representatives are sent to orientation and are trained on all aspects of customer service, including Lifeline. Operational procedures and guidelines on Lifeline are available electronically for reference by all customer-facing representatives. Cox's Product Marketing team periodically sends refresher messages to customer-facing representatives, including either an overview or general guidelines. Additionally, Cox's Lifeline Operations team has a written set of best practices and template response letters, periodically updated to reflect current changes in state or federal rules and Cox procedures.

15. Please provide any link on your Web site that provides Lifeline information.

**Response:**

<http://www.cox.com/residential/phone/lifeline.cox>  
Customers may select city and state.

16. Does your company provide Lifeline services using resale Lifeline lines obtained from an underlying carrier? If so, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

**Response:** Not Applicable.

Cox Florida Telcom, L.P.  
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# **ATTACHMENT**

## **12d**



**CALL  
TODAY!**  
**800-305-7763**

Or visit a Cox Digital Store location near you!

**MAIL TO:**  
Cox Communications  
Attention: Lifeline Department  
2206 LaVista Avenue  
Pensacola, FL 32504

Please allow 4-6 weeks for processing your application.



## COX LIFELINE TELEPHONE SERVICE

For qualified low-income customers who participate in one or more qualifying State or Federal programs or meet the annual income guidelines.

### THE BENEFITS

\$14.00 monthly telephone service discount

Unlimited local calling, including enhanced 911 access when you need it most

Phone features available at competitive rates

FREE toll restriction (deposit waived if selecting this option)

FREE Standard Professional Installation

Lifeline is a discounted telephone service program for low-income customers provided by Cox in accordance with rules and regulations established by the FCC and Florida Public Service Commission. If you qualify for the Cox Lifeline program, you are entitled to:

- \$7.00 per month Primary Telephone Line discount.
- Monthly FCC Network Access Charge of \$7.00 waived.
- Monthly charge for toll restriction waived.
- Deposit waived for Lifeline service line if you select toll restriction.
- FREE Standard Professional Installation.

