

Martin J. Corcoran  
Director, Regulatory Affairs  
6205-B Peachtree Dunwoody Rd  
Atlanta, GA 30328  
(404) 269-5556  
martin.corcoran@cox.com



August 27, 2015

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**

Re: Cox Florida Telcom, L.P.  
CLEC No. TA027  
2015 Annual CLEC and Wireless Lifeline Data Request

15 AUG 28 AM 9:32  
RECEIVED FPSC  
COX  
JUN

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 2015 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 Questions 1, 4, 5, and 6, 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

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL \_\_\_\_\_
- IDM \_\_\_\_\_
- TEL \_\_\_\_\_
- CLK \_\_\_\_\_

Enclosures

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

3x Redacted

**COX FLORIDA TELCOM, L.P.**  
**TA-027**

**2015**  
**ANNUAL CLEC and WIRELESS**  
**LIFELINE DATA REQUEST**

**PUBLIC COPIES (2)**

**CLEC AND WIRELESS LIFELINE DATA REQUEST 2015**

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 30, 2015.**

**For items 1 through 16, please provide the data for the fiscal year July 1, 2014, through June 30, 2015.**

**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 2014	
August 2014	
September 2014	
October 2014	
November 2014	
December 2014	
January 2015	
February 2015	
March 2015	
April 2015	
May 2015	
June 2015	

\* 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 customers provided Lifeline through resold Lifeline access lines.

**Response:**

Month	# of Lifeline Customers
July 2014	427
August 2014	456
September 2014	503
October 2014	507
November 2014	562
December 2014	566
January 2015	579
February 2015	603
March 2015	631
April 2015	647
May 2015	658
June 2015	659

3. 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 standard Basic Monthly Service rate for telephone, currently from \$16.99 to \$8.99. Cox customers' total Lifeline discount is \$15.00.

4. 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 [REDACTED]. The reasons were as follows: applicant was determined by NLAD to already have Lifeline service with another provider; applicant did not reside within Cox's service area; applicant was not in Cox's database; applicant's service had been disconnected or was in pending disconnection status; applicant failed to verify eligibility by either qualifying program participation or income-based qualification; applicant's name was not listed as an authorized user on the subscriber account; applicant did not submit a completed application; applicant failed to certify that household did not already have existing service with a Lifeline provider; or applicant's information did not pass NLAD verification when submitted. Additionally, two applicants were subscribers to commercial services rather than residential services.

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

**Response:**

Month	# New Lifeline Customers Added
July 2014	
August 2014	
September 2014	
October 2014	
November 2014	
December 2014	
January 2015	
February 2015	
March 2015	
April 2015	
May 2015	
June 2015	

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

**Response:**

Month	# Removed from Lifeline
July 2014	
August 2014	
September 2014	
October 2014	
November 2014	
December 2014	
January 2015	
February 2015	
March 2015	
April 2015	
May 2015	
June 2015	

\*\* In June 2014, an initial NLAD data entry error caused several customers, whether valid or invalid, to appear as "duplicates" in the NLAD database. Cox was required to send notices and to de-enroll customers who failed to supply IEH forms within a 30-day window. In December 2014, the higher number represents the de-enrollments required by USAC as part of the 2014 Recertification process.

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

**Response:**

Month	# Customers receiving Transitional Lifeline
July 2014	0
August 2014	0
September 2014	0
October 2014	0
November 2014	0
December 2014	0
January 2015	0
February 2015	0
March 2015	0
April 2015	0
May 2015	0
June 2015	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's has contracted with a nationally-based Lifeline operations administrator, Solix, which receives and processes applications on behalf of Cox. These applications are mailed or faxed by applicants to Solix's address, listed on the Cox application form. Applications that are turned in to Cox Solutions Stores (retail center) representatives are sent to Cox's Lifeline Operations team, working in conjunction with Solix. Solix reviews and processes all applications sent directly to Cox to ensure valid proof of (1) either 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. Solix also reviews to ensure the submission of all other federally required information: SSN-4; DOB; applicant's acknowledgment and acceptance of the NLAD disclosures and consent; initialed acknowledgment of federally required Lifeline disclosure information; and applicant's verification that there is currently no other Lifeline assistance being received in the applicant's household/independent economic unit. Solix then enters each applicant into the NLAD database as required by USAC. Once the customer is cleared via NLAD, Solix provides Cox's Lifeline Operations team with the notice that the Lifeline discount code can then be placed on the applicant's account, which is processed on the day the approval is confirmed by Solix.

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

**Response:**

The Solix team regularly accesses the FPSC secure application site to download the list of pre-qualified Lifeline applicants. Solix then reviews each applicant's information and enters the data into the NLAD database, as required by USAC, to verify eligibility. Once the customer is cleared via NLAD, the Lifeline discount code is applied to the customer accounts via Solix's notification to Cox's operation team as described in (b), above. For each downloaded applicant list (or batch), Solix then uploads any applicant rejections, along with FPSC-designated reason codes, into the FPSC's secure website.

- 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 procedure from review of the application to completion of its processing. 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 certification of customer eligibility after initial certification. Include the following in your response:

- a. Time period between initial certification and annual certification.

**Response:**

Cox utilizes USAC's annual verification procedures. The 2015 recertification is currently underway, and USAC is in the process of contacting all active Lifeline customers as of the February 2015 Data Month.

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

**Response:**

Same as stated in (a) above. Upon completion of USAC's recertification results, Cox will either retain or de-enroll a customer based on USAC's instructions to Cox based on its determination of whether or not that customer remains eligible for the Lifeline benefit.

- c. Frequency of periodic certification.

**Response:**

In accordance with Cox's utilization of USAC's procedures as stated in (a) above, Cox will work with USAC to conduct the Lifeline recertification process on an annual basis.

- 12. Description of your company's procedures for 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:** Please 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 the Lifeline program 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.

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.

**ATTACHMENT 12-d**

TV PERSONALIZED JUST FOR YOU

**The Contour App**  
A revolutionary app for your iPad\* and select Android™ tablets, with personalized entertainment options that are just a swipe away.

**Contour on your TV**  
The Contour guide learns what you like and brings you new shows that you are likely to love.

**Contour's Record & DVR**  
The optional Record & DVR lets you record six favorite shows at once—and store 1,000—with one DVR. See the other side for more information.

Speak to a Cox representative today to learn how to get Contour, or go to [cox.com/contour](http://cox.com/contour)



**COX DIGITAL TELEPHONE + COX HIGH SPEED INTERNET**

for only

**\$44.99**

PER MONTH FOR 12 MONTHS\*

**THIS AFFORDABLE PACKAGE IS THE RIGHT CALL.**

*Cox Digital Telephone Essential includes:*

- DEPENDABILITY**  
UNLIMITED LOCAL CALLING
- SAFETY**  
ENHANCED 911 SERVICE

*Cox High Speed Internet Essential includes:*

- DOWNLOAD SPEEDS UP TO 5 MBPS**
- FREE SECURITY SOFTWARE**  
OVER \$169 IN VALUE

LOOK AT ALL YOU GET WITH COX DIGITAL TELEPHONE + COX HIGH SPEED INTERNET



- Great Savings!** Reliable home phone service at a great price
- Talk More!** Unlimited local calling plus 4 calling features and Phone Tools
- Go Fast!** Access to the fastest in-home WiFi so you can surf, stream and share on more devices
- Safety First!** Over \$169 in Security Software included at no extra cost—to keep your family safe from viruses and inappropriate online content



**SAVE!  
EVEN MORE ●**

You may qualify for additional discounts of \$15.00\* for Lifeline telephone. Visit [cox.com/lifeline](http://cox.com/lifeline)  
\*Lifeline service is subject to federal eligibility requirements

CALL  
866-936-7121

VISIT  
CRESTVIEW  
1312 N. Ferdon Blvd.



\*Offer expires 9/30/14 and is available to new residential customers in Cox service areas. \$44.99/month includes new subscription to Cox High Speed Internet Essential and Digital Telephone Essential for 12 months. After 12 months, regular rates apply. See [www.cox.com](http://www.cox.com). Prices exclude additional installation/activation fees, inside wiring fees, additional outlets, taxes, surcharges and other fees. Not all services and features available everywhere. A credit check and/or deposit may be required. Offer may not be combined with other offers. Cable modem required for Internet services. ADOCSIS 2 modem is required to consistently receive optimal speeds for Preferred and higher tiers, and is strongly recommended for all other tiers. Uninterrupted or error free Internet service, or the speed of your service, is not guaranteed. Actual speeds vary. Fastest WiFi based on June 2013 study of comparable in-home wireless routers by Axiom Test Labs, Inc. Telephone modem required and will be provided for duration of phone service subscription. Upon disconnection of phone service, modem must be returned within 30 days or a monthly rental fee or lost equipment charge will apply. Modem uses household electrical power to operate. Telephone service, including access to e911 service, will not be available during a power outage without a battery or if the modem is moved or inoperable. New modem installs do not come with a battery. You may purchase a battery from Cox or, if you are a Lifeline customer, obtain a battery from Cox without charge. You must monitor and replace the battery as needed (see [www.cox.com/battery](http://www.cox.com/battery)). Other conditions apply. © 2014 Cox Communications, Inc. All rights reserved. GNIUE2P1.03



# Qualifying Digital Telephone Packages Also Include

## 911

### **ENHANCED 911 SERVICE**

The next time you Dial 911, e911 will automatically send your location and phone number ahead to emergency personnel.



### **EASY TO SWITCH**

Switch your home phone service to Cox more quickly and easily than ever before. You can even keep the same telephone number!



### **INTERNATIONAL CALLING**

Keep up with people from around the world with a variety of international calling plans designed with your lifestyle in mind.



### **LIFELINE**

Set up your Lifeline, an unlimited local calling plan with monthly discounts for qualifying low-income households



### **FREE CALL-BLOCKING**

Protect your family, privacy and pocketbook by blocking long-distance calls turning off caller ID and more.

<http://www.cox.com/residential/phone.cox>





## Cox Digital Telephone Lifeline Service

- Lifeline helps qualified applicants with the cost of their phone bill during hard times.
- Service deposit waived for the telephone line if you voluntarily elect to receive free toll blocking and/or toll restriction.

[See details](#)

<http://www.cox.com/residential/phone.cox>