



August 12, 2016

Ms. Beth Salak
Director – Office of Telecommunications
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: 2016 Lifeline Report Data Request.

Dear Ms. Salak:

On behalf of Knology of Florida, Inc. dba WOW! Internet, Cable & Phone (“WOW!”), I have enclosed its response to the Commission’s Lifeline/Link up data request. Due to the proprietary nature of some of the data, WOW! is requesting confidentiality. To that end, I have enclosed an original plus a redacted version of this response.

As always, thank you in advance for your courtesies in this matter. Should you have any questions about the enclosed material, please do not hesitate to call me at (706) 645-3966.

Sincerely,

A handwritten signature in black ink that reads "Melissa Marks".

Melissa Marks
Legal & Regulatory Compliance Analyst
WOW! Internet, Cable & Phone

REDACTED

Enclosures

RECEIVED-FPSC
2016 AUG 15 PM 1:27
COMMISSION
CLERK

CLEC AND WIRELESS LIFELINE DATA REQUEST 2016

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, 2016. Your response should include your company name, contact person, and email address.**

For items 1 through 16, please provide the data for the fiscal year July 1, 2015, through June 30, 2016.

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.
[REDACTED]
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.
[REDACTED]
3. The amount of Lifeline credit provided to Lifeline customers on a monthly billing.
[REDACTED]
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).
[REDACTED]
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.
[REDACTED]
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.
[REDACTED]
7. The number of customers participating in Transitional Lifeline each month.
[REDACTED]
8. The number of customers participating in Lifeline under the Tribal Lands provision each month.
[REDACTED]
9. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

- [REDACTED]
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.
 - b. Procedures used to process applications received directly from customers.
 - c. Procedures used to process applications received through the PSC on-line process.
 - d. Procedures used to process applications received through the Department of Children and Families coordinated enrollment 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.

- [REDACTED]
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 recertification.
 - b. Method(s) used to verify customer eligibility.

- [REDACTED]
12. Description of your company's procedures for Lifeline. Include the following in your response:
 - a. Internal procedures for promoting Lifeline.
 - b. Outreach and educational efforts involving participation in community events.
 - c. Outreach and educational efforts involving mass media (newspaper, radio, television).
 - d. Copies of Lifeline outreach materials of your company.
 - e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

- [REDACTED]
13. Please describe the training you provide to your customer service representatives regarding Lifeline and provide the script used by your company's representatives.

- [REDACTED]
14. Please provide any link on your Web site that provides Lifeline information.

- [REDACTED]
15. Did 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.

- [REDACTED]
16. Do you anticipate offering and seeking reimbursement for Basic Internet Access Services (BIAS) in Florida as part of the Lifeline Program? If yes, please project when you will offer BIAS and when you will seek reimbursement for it.

Response: [REDACTED]

17. Do you see any impediments in the implementation to the FCC's new Lifeline Order (FCC 16-38)?

Response: [REDACTED]

18. To the extent you have experienced a decline in Lifeline customers, please list and describe any issues that may have contributed to the decline. Any additional general comments or information you believe will assist staff in evaluating and reporting the Lifeline participation in Florida are welcome.

Response: [REDACTED]

Knology of Florida, Inc. DBA WOW! Internet, Cable & Phone
2015-16 Lifeline Data Request - Attachment 1
Confidential Filing

<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>	<u>June</u>
<u>2015</u>	<u>2015</u>	<u>2015</u>	<u>2015</u>	<u>2015</u>	<u>2015</u>	<u>2016</u>	<u>2016</u>	<u>2016</u>	<u>2016</u>	<u>2016</u>	<u>2016</u>

- 1 Access Lines (Residential)
- 2 Lifeline Customers (excludes transition customers)
- 4 Customers Denied Lifeline
- 5 Lifeline Customers Added
- 6 Lifeline Customers Removed
- 7 Transitional Lifeline Customers



**Knology of Florida, Inc. DBA WOW! Internet, Cable & Phone
 2015-16 Lifeline Data Request - Attachment 2
 Confidential Filing**

<u>Reasons for Denied Lifeline Applications</u>	July 2015	August 2015	September 2015	October 2015	November 2015	December 2015	January 2016	February 2016	March 2016	April 2016	May 2016	June 2016
Not a customer	[REDACTED]											
Not in service area	[REDACTED]											
Business account - Doesn't qualify	[REDACTED]											
Number does not belong to the applicant	[REDACTED]											
Customer Disconnecting	[REDACTED]											
Knology account not in applicant's name; applicant is n	[REDACTED]											
Address does not match PSC file	[REDACTED]											
No response for recertification - changed to transistion	[REDACTED]											
NLAD Duplicate Subscriber and/or Duplicate Address	[REDACTED]											
Total	[REDACTED]											

WOW! Internet, Cable & Phone

Lifeline Florida

ATTACHMENT 3

2016

Lifeline Florida

REDACTED



Lifeline Florida

REDACTED



Lifeline Florida

REDACTED



Lifeline Florida

REDACTED



Lifeline Florida

REDACTED



Lifeline Florida

REDACTED



Knology of Florida, Inc. (d/b/a WOW!)
Knology of Central Florida, Inc. (d/b/a WOW!)

Florida LifeLine Assistance Program

Making phone service even more affordable.

Because phone service is so important in today's world, WOW! believes everyone should have access to it. We offer a discounted telephone service plan, Lifeline Florida, which makes basic phone service even more affordable for qualified customers. Lifeline Florida provides qualified customers with discounted phone service and the ability to add additional services and features.

How do I Qualify for Lifeline Assistance?

Lifeline Assistance is a federal benefit available to residential telephone customers who have an annual household income at or below 135% of the Federal Poverty Guidelines for a household of its size or who participate in any of the following low-income assistance programs:

- ❖ Medicaid
- ❖ Supplemental Nutrition Assistance Program (SNAP or Food Stamps)
- ❖ Supplemental Security Income (SSI)
- ❖ Section 8 Federal Public Housing Assistance (FPHA)
- ❖ Low Income Home Energy Assistance Program (LIHEAP)
- ❖ Temporary Assistance for Needy Families (TANF)
- ❖ National School Lunch Program's Free Lunch Program (NSLP)

You may also be eligible for Lifeline Assistance even if you do not personally participate in one of these programs, as long as an individual who lives in your household, and for whom you are financially responsible, participates in at least one of these programs.

For purposes of the Lifeline program, a "household" is defined as any individual or group of individuals who live together at the same address and share in the household's income and expenses. A household may include related and unrelated persons.

If you want to qualify for Lifeline Assistance based on your annual household income, you must provide proof of your income through one or more of the following:

- Most recent state or federal tax return
- Retirement/pension statement of benefits
- Current income statement from an employer
- Unemployment/Workmen's Compensation Statement of Benefits
- Paycheck stubs for most recent 3 consecutive months
- Federal notice letter of participation in General Assistance
- Social Security Statement of Benefits
- Veterans Administration Statement of Benefits
- Child Support document

- Divorce decree
- Other official document containing income information for at least 3 consecutive months time

NOTE: Federal Poverty Guidelines are updated annually; updates not reflected here are available at www.usac.org or from WOW! customer service.

Annual Income 135% Thresholds Based on Household Size (2016)								
1 person	2 people	3 people	4 people	5 people	6 people	7 people	8 people	For each additional person
\$16,038	\$21,627	\$27,216	\$32,805	\$38,394	\$43,983	\$49,586	\$55,202	+ \$5,616 per person

If you want to qualify for Lifeline Assistance based on participation in one of the low-income assistance programs, you must provide proof of participation with one or more of the following:

- Current or prior year's statement of benefits from a qualifying state or federal program
- A current notice letter of participation in a qualifying state or federal program
- Program participation documents, such as a copy of your SNAP card, Medicaid card, etc.
- Other official document evidencing the qualifying person's participation in one of the listed state or federal low-income assistance programs

NOTE: The FCC's rules require WOW! to keep a copy of any of the supporting documentation you provide in support of your eligibility to receive Lifeline benefits.

Are There Any Restrictions on Lifeline Assistance?

Lifeline Assistance is only available for one telephone or wireless (cellular) line per household, which is used as the primary residential line. The household may not receive Lifeline benefits from more than one company. Violation of this "one-per-household" rule is a violation of the rules of the Federal Communications Commission and will result in your de-enrollment from the Lifeline Assistance program and possible prosecution by the United States Government.

Lifeline Assistance is a federal benefit – willfully making false statements in order to receive government assistance can result in a fine or imprisonment or cause you to be de-enrolled or barred from the program. It is also a violation of federal law to rent, sell or give away your Lifeline service to any other individual.

You must notify WOW! within 30 days if you or the qualifying resident in your household no longer participate in the government assistance program(s) that qualify you for Lifeline Assistance; if your qualifying annual household income exceeds 135% of the Federal Poverty Guidelines; or if you no longer qualify to receive Lifeline Assistance for any other reason. If you move to a new address, you must also provide your new address to WOW! within 30 days after relocating.

Customers who do not subscribe to Toll Limitation Service at the time of signing up for Lifeline Assistance may be required to provide a service deposit, consistent with the terms of WOW!'s General Subscriber Services Tariff.

The benefits of Lifeline Florida include the following:

- Monthly discount on basic service of \$12.75
- Waiver of deposit for local service¹
- Optional toll restriction at no charge¹
- Optional blocking of 900/976 numbers
- Additional lines allowed²
- Optional services available (e.g., Caller ID, Call Waiting, etc.)
- Optional blocking of pay-per-use features

How Do I Apply for Lifeline Assistance?

Knology of Florida, Inc. (Panama City Office)

You may apply in person for Lifeline Assistance at WOW!'s business office, located at 235 West 15th St. in Panama City, Florida, between the hours of 8:00am and 5:00pm CST, Monday through Friday. You must complete the Lifeline application form and bring proof of your eligibility for Lifeline Assistance based on either your household income or participation in one of the qualifying low-income assistance programs. If you have questions about Lifeline Assistance, you may call our customer service representative at (850) 215-2161 during normal business hours.

Knology Total Communications, Inc. (Dothan, AL Office)

You may apply in person for Lifeline Assistance at Knology's business office, located at 2660 Montgomery Hwy in Dothan, Alabama, between the hours of 8:00am and 5:00pm CDT, Monday through Friday. You must complete the Lifeline application form and bring proof of your eligibility for Lifeline Assistance based on either your household income or participation in one of the qualifying low-income assistance programs. If you have questions about Lifeline Assistance, you may call our customer service representative at (334) 699-3333 during normal business hours.

Note: PDF format requires Adobe Acrobat Reader, available free.

More Lifeline information is available in our Company Tariffs located at

<http://www.wowway.com/terms-and-conditions/south>

¹ Deposit waived on new local service only. If customer has outstanding toll debt, toll restriction required.

² Lifeline Florida plan benefits are only applicable on one phone line at the customer's principal place of residence.

Questions or complaints concerning Lifeline service may be directed to the Florida Department of Agriculture Consumer Service Unit at (800) 435-7352.