

Leslie McLaughlin
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August 15, 2018

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
2018 Annual Lifeline Data Request (Undocketed)

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 2018 Annual 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, 2, 4, 5, 6, and 7, 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
7401 Florida Boulevard, Baton Rouge, LA 70806
(225) 237-5131/ leslie.mclaughlin@cox.com
Assistant to Esther Northrup,
Executive Director, State Regulatory Affairs

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Enclosures

cc: Mr. Greg Fogleman, Office of Telecommunications
Ms. Sakina Deas, Office of Industry Development and Market Analysis

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

**2018
ANNUAL LIFELINE DATA REQUEST**

PUBLIC COPIES (2)

CLEC AND WIRELESS LIFELINE DATA REQUEST 2018
COX FLORIDA TELCOM, L.P. TA-027

To assist the Florida Public Service Commission 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 16, 2018. 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, 2017, through June 30, 2018.

For those items requesting 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 2017	
August 2017	
September 2017	
October 2017	
November 2017	
December 2017	
January 2018	
February 2018	
March 2018	
April 2018	
May 2018	
June 2018	

* 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.

Response:

Month	# of Lifeline Customers
July 2017	
August 2017	
September 2017	
October 2017	
November 2017	
December 2017	
January 2018	
February 2018	
March 2018	

Month	# of Lifeline Customers
April 2018	
May 2018	
June 2018	

3. The amount of Lifeline credit per line provided to Lifeline customers on their monthly bill.

Response:

Cox Lifeline customers receive a discount that includes (1) a waiver of the \$6.00 FCC Access Charge and (2) a reduction of \$8.00 from the standard, tariffed Basic Monthly Service rate for telephone, currently tariffed at \$ 19.99 effective April 2018. Cox customers' total Lifeline discount is \$14.00.

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]. In general, the various reasons for denial are as follows: applicant is determined by NLAD to already have Lifeline service with another provider; applicant does not reside within Cox's service area; applicant is not in Cox's database; applicant's service has been disconnected or is in pending disconnection status; applicant has failed to verify eligibility by either qualifying program participation or income-based qualification; applicant's name is not listed as an authorized user on the subscriber account; applicant did not submit a completed application; applicant has failed to certify that household does not already have existing service with a Lifeline provider; or applicant's information did not pass NLAD verification when submitted. During this reporting period, the primary reasons were: Customer was currently receiving Lifeline; applicant was disconnected for nonpayment; applicant had not completed the application form correctly; applicant's information did not pass NLAD verification.

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

Response:

Month	# of New Lifeline Customers Added
July 2017	
August 2017	
September 2017	
October 2017	
November 2017	
December 2017	
January 2018	
February 2018	
March 2018	

Month	# of New Lifeline Customers Added
April 2018	
May 2018	
June 2018	

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers moved to Transitional Lifeline.

Response:

Month	# Removed from Lifeline
July 2017	
August 2017	
September 2017	
October 2017	
November 2017	
December 2017	
January 2018	
February 2018	
March 2018	
April 2018	
May 2018	
June 2018	

7. In accordance with Section 364.105, Florida Statutes, are you offering Transitional Lifeline service? If yes, what is the number of customers participating per month and what are your advertising efforts for Transitional Lifeline service?

Response:

Cox makes available Transitional Lifeline Service, but currently has received no request to provide the 12-month discounted rate. Although Lifeline is advertised, Transitional Lifeline service is currently not advertised.

8. Describe 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 has established a completion process within a window of 3 business days, but as a practice often completes the process within one business day. The Lifeline discount code is applied to the account upon receipt of a valid Lifeline application, which is determined as described above, effective as of the date it is verified. The discounted rate begins on that date and appears on the next billing statement.

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

- a. Internal procedures for promoting Lifeline.

Response: No change from the previous year.

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

Response: No change from the previous year.

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

Response: No change from the previous year.

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

Response: Cox's Marketing division conducted mailings in Florida in September 2017 and in February 2018. Copies of the mailings are provided in **Attachment DR-9d.**

- e. Any links on your company Web site that provides Lifeline information.

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

Customers must select state and city.

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

Response: No change from the previous year.

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

Response: No; Cox does not provide resale local exchange service.

11. To the extent you have experienced a decline in Lifeline customers since last year, 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 Lifeline participation in Florida are welcome.

Response: No change from the previous year. As a rule, any such declines experienced are found to be in connection with annual recertification failures or Lifeline benefit transfers via NLAD from Cox to another Lifeline provider.

12. Is your company currently providing Lifeline in any of the first six States that have transitioned to the National Verifier? If yes, please identify any issues you have experienced utilizing the National Verifier.

Response: No; Cox does not provide service in any states that have transitioned to the National Verifier at this time.

13. Did your company elect to participate in USAC recertification of Lifeline consumers for 2018?

Response: Yes, Cox's Florida Lifeline customers will be recertified via USAC.

14. If you elected USAC recertification, are you aware that in order to elect for 2019 recertification you must fill out the forms on USAC's website between July 16, 2018 and August 31, 2018?

Response: Yes, Cox is aware, and this procedure is in progress.

15. Have you switched to using the new National Lifeline Application/Recertification forms in Florida?

Response: Yes, Cox is using the new forms.

16. The Lifeline Modernization Order of 2016 requires ETC's to offer Broadband Internet Access Services. To the extent that you are not offering Broadband Internet Access Services, have you submitted a forbearance notification to the FCC? If yes, please provide the date of your submission.

Response: Per Cox's exhibit provided to this Commission in 2017, Cox filed a forbearance notification with the FCC on November 17, 2016 stating that Cox's Telcom entities do not provide Broadband Internet Access Services (BIAS) in any state. Cox subsequently filed a supplemental notification on December 1, 2016 providing state ETC information.

ATTACHMENT DR-9d

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EasyPay ensures your bill is paid automatically and safely. And Paperless Billing lets you store, search and navigate bills while also saving trees.

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1. Visit cox.com and log into My Account.
2. Click the links in the "My Bill" box to enroll in:
Paperless Billing
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EasyPay and Paperless Billing are good for you and the environment.

IMPORTANT CUSTOMER INFORMATION

[REDACTED], UPGRADE YOUR EXPERIENCE TODAY

00001ECRWSH**R-001



Freeport FL 32439

000308



Hi [REDACTED],

We enjoy having you as a customer and appreciate your business. We also want you to know, if you are participating in one of several federal or state programs or if you have a limited income, you may qualify for our special low price on Digital Telephone service. Here's a unique offer made just for you.

BUDGET-FRIENDLY CONNECTION

Enjoy unlimited local calling at a low price, keeping you connected to family and friends.

HOME PHONE DEPENDABILITY

Cox Digital Telephone* works when you need it, even during limited power outages thanks to a backup battery.†

PEACE OF MIND WITH E911

With Enhanced 911, your address and phone number are automatically provided to your local dispatcher in case of an emergency.

It's time to experience home telephone service for only \$8.99 per month. Call **888-609-5573** today and see if you qualify.

Kind regards,

Colleen Levy

Colleen Levy
V.P. Field Marketing, Central

P.S. Learn more by checking out the back of this letter, and don't forget to redeem this offer today—just \$8.99 per month.*

COX DIGITAL TELEPHONE*
\$8.99
per month**
Special price for qualified customers only



Great Value



Reliable Calling

e911

Emergency Ready



Call **888-609-5573**

Click cox.com/lifeline

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▶ GET MORE. ENJOY MORE.



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Personalize Your Entertainment
Discover new shows recommended for you and get personalized music from Pandora!

Watch TV on Your Tablet
Watch live TV and On Demand TV shows anywhere in your home with the Contour App.

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Record 6 shows at once and store 1000.



COX HIGH SPEED INTERNET**

Access to Super-Fast In-Home WiFi
Swift stream and share on more devices.

Stay Safe and Secure
Protect your computer from viruses and spyware with free security software.

My WiFi
Control your in-home WiFi from your mobile device, personalize your network and see every connected device with the My WiFi tool.



COX DIGITAL TELEPHONE*

Easy to Switch
Keep your current phone number.

Emergency Ready
Be prepared with 911 service.

TV Caller ID
You can see who's calling right on your TV screen.

HOME SECURITY & CONTROL—ANYWHERE, ANYTIME



COX Homelife | Protect. Monitor. Control.

Protect
Secure what matters most with 24/7 professional security monitoring plus access to safety features that detect fire, carbon monoxide and water leaks.

Monitor
Helpful cameras allow you to check in on kids or pets with live video of your home on your mobile device or view up to 10 days of 24-hour recorded video from any web browser.

Control
Remotely adjust your thermostat, control your lighting, turn smart appliances on and off, and lock or unlock doors from anywhere, anytime.

Take a Tour of the experience by downloading the FREE Cox Homelife mobile app today.

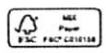
FOR MORE INFORMATION, VISIT COX.COM/LEARN TODAY



*Cox phone service provides high quality voice connections to residential customers in Cox's service area. Active service is a government assistance program in which eligible customers may enroll. The service is not transferable and limited to one discount per household. The advanced security discount. Active local flat rate service is available only to qualifying residential customers who provide and maintain verification of phone eligibility based on criteria determined by governing regulatory authorities. FCC access charge waived. Cost of toll long distance phone feature, directory or operator assisted calls additional per minute. Fees and surcharges additional. **Cable modem using a DSL or copper telephone device may be eligible for discount as per additional fee. Active Microsoft user option available at additional monthly charge. All customers. Unavailable on certain service areas. Active service can be directed to the Cox Cable Service Connection Status page at 800.342.5433.

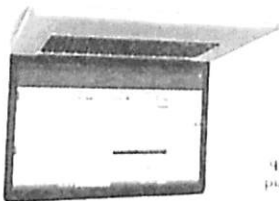
†Phone modem required and will be provided for duration of service subscription. Modem is not to be returned within 30 days of discontinuation of phone service or a monthly rental fee or fee equipment charge applies. Modem user is responsible electrical power to operate. Phone service, including 911 service, will not be available during a power outage unless a battery or if the modem is powered in a separate location. Non-modem results do not cover mobile battery. You may purchase a battery from Cox or if you are a direct customer obtain a battery from Cox without charge. You may monitor and replace the battery as needed. See www.cox.com/batteries. The battery provides up to eight hours of standby power or up to four hours of talk time using a corded telephone. Connected directly to the telephone enables working jack. See help.cox.com about telephone/battery mode to battery power for more information about use of your Cox Digital Telephone service during a power outage. Other restrictions apply.

**Service speed shown may require additional subscription. Speed & storage capacity based on 1000 hours of 50 programming capacity users with max of 20 and 40 recordings. To Call: 0 requires Cox Advanced TV and Cox Digital Telephone. Location in Permit: Cox Homelife Service provided by Cox Advanced Services, Atlanta, GA; A.B.M. service No. 18181 & 82; service No. 310976; Atlanta, GA; service No. 132448026; MTY 8002276; California, CA; service No. 81794 & Contractor's service #872492; Charlotte, NC; service #98; Florida, FL; service No. 172000124; Georgia, GA; service Bryan David Morrison #40806175; Idaho, ID; service #1234433; Iowa, IA; service #371646 & 82368; Kansas, KS; service #2046; Nebraska, NE; service #30512; Nevada, NV; service #18331; Ohio, OH; service #1319 1671; Oklahoma, OK; service #1002; North Carolina, NC; service #1114; North Dakota, ND; service No. 819 & Wichita service No. 2075, 8076, and Virginia, VA; service #117776, 1-2018 Cox Communications, Inc. All rights reserved.





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1. Visit cox.com and log into My Account.
2. Check the links in the "My Bill" box to enroll in Paperless Billing.
3. Automatic Payments.

EasyPay and Paperless Billing are good for you and the environment.

IMPORTANT CUSTOMER INFORMATION

, UPGRADE YOUR EXPERIENCE TODAY

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Hi

We enjoy having you as a customer and appreciate your business. We also want you to know, if you are participating in one of several federal or state programs or if you have a limited income, you may qualify for our special low price on Digital Telephone service. Here's a unique offer made just for you.

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Special price for qualified customers only



Great Value



Reliable Calling

e911

Emergency Ready

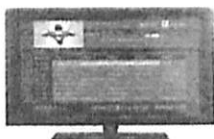




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Add Record & DVR
Record & shows at once and store XUDO.



COX HIGH SPEED INTERNET**

Access to Super-Fast in Home WiFi
Surf, stream and share on more devices.

Stay Safe and Secure
Protect your computer, both viruses and spyware with free security software.

My WiFi
Control your in-home WiFi from your mobile device, personalize your network and see every connected device with the My WiFi tool.



COX DIGITAL TELEPHONE*

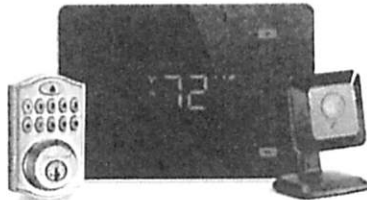
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HOME SECURITY & CONTROL — ANYWHERE, ANYTIME

COX Homelife | Protect. Monitor. Control.



Protect

Secure what matters most with 24/7 professional security monitoring plus access to safety features that detect fire, carbon monoxide and water leaks.

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Helpful cameras allow you to check in on kids or pets with live video of your home on your mobile device or view up to 10 days of 24-hour recorded video from any web browser.

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Take a Tour of the experience by downloading the FREE Cox Homelife mobile app today.

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