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July 20, 2012

# HAND DELIVERY

Ms. Ann Cole, Clerk Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

| claim of confidentiality notice of intent request for confidentiality filed by OPC           | COMMISS |
|--|---------|
| For DN <u>04892-12</u> which is in locked storage. You must be authorized to view this DNCLK | Z Sign  |

Re: Docket No. 120165-TP - Application for designation as an Eligible Telecommunications Carrier (ETC) pursuant to Section 214(e)(2) of the Communications Act of 1934 for the limited purpose of receiving federal Universal Service Low Income support for providing Lifeline service to qualified households in its non-rural service territory, by Cox Florida Telecom, LP.

Docket No. 120175-TP - Application for designation as an eligible telecommunications carrier pursuant to Section 214(e)(2) of the Communications Act of 1934 for the limited purpose of receiving federal universal service low income support for providing lifeline service to qualified households in its rural service territory, by Cox Florida Telecom, LP d/b/a Cox Communications d/b/a Cox Business.

Dear Ms. Cole:

COM

AFD

APA

ECO ENG GCL

TEL

CLK

Enclosed for filing, please find one highlighted and two redacted copies of Cox Florida Telcom, L.P. d/b/a Cox Communications d/b/a Cox Business d/b/a Cox's Responses to Staff's First Data Requests in the above-referenced Dockets, as well as Exhibit A to those Responses. The highlighted information set forth therein includes customer-specific account information, competitive information regarding Cox's service in Florida, as well as contractual information, all of which constitutes proprietary confidential business information as contemplated by Section 364.183, Florida Statutes, and is protected by Cox for competitive business reasons and as otherwise required by contract and by law. As such, Cox asks that this information be afforded confidential treatment in accordance with the "claim" provisions of Rule 25-22.006(5), Florida Administrative Code.

DOCUMENT NUMBER-CATE

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Ms. Ann Cole, Clerk July 20, 2012 Page 2

Thank you for your assistance with this filing. As always, please don't hesitate to contact me if you have any questions or concerns.

Sincerely,

Beth Keating

Gunster, Yoakley Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

Dockets Nos. 120165-TP and 120175-TP

# EXHIBIT A COX BILLS

Residential and Business

(Highlighted Copies Provided under Confidential Claim)



# Responses of Cox Florida Telcom L.L.C. to

# FPSC General Data Request for Docket No. 120165-TP and 120175-TP

As for the identification of the "Cox" entity, Cox understands the Staff's Data Requests to, in some instances, seek information beyond Cox Florida Telcom, LP. Therefore, "Cox" as referenced herein, refers to the applicant in this Docket, Cox Florida Telcom, LP, as well as similarly-situated affiliates and other subsidiaries under the Cox Communications, Inc. umbrella. Any responses that specifically pertain to Cox Florida Telcom, LP, are identified as such.

#### DR-1:

Please list all pending ETC petitions and the state in which the designation is requested.

Cox Response: Information responsive to the Staff's request is provided in the table below.

| State      | Docket No.    | Filing Type               | Date Filed |
|------------|---------------|---------------------------|------------|
| Oklahoma   | PUD-2011-29   | LifeLine Only             | 2-22-11    |
| Oklahoma   | PUD-2011-30   | LifeLine Only             | 2-22-11    |
| Florida    | 120165-TP     | LifeLine Only (non-rural) | 5-31-12    |
| Florida    | 120175-TP     | LifeLine Only (rural)     | 6-15-12    |
| Louisiana  | S-32430       | LifeLine only (rural)     | 7-2-12     |
| California | Advice Letter | Lifeline only             | 7-2-12     |

# DR-2:

Has Cox filed for ETC status in any state and subsequently withdrawn its petition? If so, please list the state and docket number.

Cox Response: No. Cox has not withdrawn a Petition or application for ETC status in any of its states.

# DR-3:

How many Florida residential and commercial customers does Cox presently serve? Please provide both the number of residential and business numbers.

<u>Cox Response</u>: As of June 30, 2012, Cox Florida Telcom, LP provided telephony service to approximately residential customers and business customers in the state of Florida.

| COM | DR-4:   |
|-----|---|
| AFD | If Cox receives ETC designation in Florida, approximately how long will it take for Cox to offer Lifeline     |
| APA | service in the area in which it receives the ETC designation? Please elaborate on any extended or             |
| ECO | special circumstances.  |
| ENG |   |
| CCL | <u>Cox Response</u> : Upon approval, Cox Florida Telcom, LP anticipates the ability to offer Lifeline service |
|     | within days of ETC approval. This timeframe will allow for the development and creation of collateral         |
|     | POCUMENT NUMBER - DATE  |
| CLK |   |

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FPSC-COMMISSION CLERK

materials, the distribution of the materials to local agencies, the development of the Lifeline webpage on cox.com, the training of Cox Sales personnel and the establishment of Lifeline back-office support needs.

#### DR-5:

Does Cox understand that there may be an audit by the FPSC of the use of universal service funds?

<u>Cox Response</u>: Yes. Cox Florida Telcom, LP is aware that the FPSC may seek to audit its use of universal service funds.

# DR-6:

Does Cox have any outstanding complaints at any state commissions or at the FCC? Please provide detailed documentation of any complaint filed with a state commission or at the FCC in the past three years.

<u>Cox Response</u>: As of July 9, 2012, Cox has no unresolved Lifeline complaints which we understand to be the focus of this request.

# DR-7:

Is Cox's account current with the FCC in regards to regulatory fees?

Cox Response: Yes.

# DR-8:

Is Cox's account current with the Universal Service Administrative Company (USAC) in regards to universal service contributions?

Cox Response: Yes.

# DR-9:

Please provide a description of Cox's corporate structure, with both names and titles. Please provide a list of Cox's corporate officers and indicate if any are also corporate officers of any other telecommunications company.

<u>Cox Response</u>: Cox Florida Telcom, LP is the Cox CLEC certificate holder in Florida and is owned 99% by CoxCom, LLC and 1% by Cox Telcom Partners, LLC. All three companies are wholly owned indirect subsidiaries of Cox Communications, Inc. All the companies are Delaware formed entities.

A list of Cox Florida Telcom's corporate officers is included in the following table. Some of these officers are also corporate officers of other Cox companies.

| Title   | Officer  |
|---|--|
| President   | Pat Esser  |
| Vice President  | Harbin Bolton Maria L. Friedman Katy Boren Jill Campbell Keith L. Gregory Jennifer Hightower |
| Vice President of Cox Wholesale,<br>Carrier and National Accounts | Jeremy Bye   |
| Secretary   | Shauna Sullivan Muhl   |
| Assistant Secretary   | Charles N. Bowen   |
| Treasurer   | Maria L. Friedman  |

#### DR-10:

Please provide a typical Cox residential and business customer bill. What is the average residential bill in Florida?

<u>Cox Response</u>: A copy of a typical residential and business bill is included in Exhibit A. The average monthly revenue per Florida residential subscriber associated with all telephony products as of June 2012 is

#### DR-11:

List the amount per customer Cox will seek for Lifeline reimbursement from USAC if granted ETC status.

<u>Cox Response</u>: Cox Florida Telcom, LP will seek reimbursement for the current permissible amount of \$9.25 from USAC for each of its LifeLine customers.

# DR-12:

Are all of Cox's offerings bundled packages? Will Cox provide the Lifeline discount to any bundle a customer chooses? Will Cox have a stand-alone Lifeline offering? If so, please describe.

<u>Cox Response</u>: Not all of Cox's offerings are bundled packages. Cox Florida Telcom, LP offers a standalone telephone line ("Starter"), as well as a phone line with feature package ("Essential"), and a phone line combined with feature packages and a direct-dialed domestic long distance package ("Premier"). Cox also offers bundled packages that combine its telephone and unregulated product offerings. Cox intends to provide the Lifeline discount to any service package that a qualified Lifeline customer may

choose. Cox is currently not considering a stand-alone Lifeline offering, as Cox plans to make all current offerings available to Lifeline customers.

# DR-13:

Does Cox understand that Florida ETCs are required to provide a non-reimbursable \$3.50 credit per month to each Florida Lifeline customer's bill in addition to the Federal reimbursement credit?

Cox Response: Yes.

# DR-14:

Does Cox understand that Florida's Lifeline program provides that if a Lifeline customer is no longer eligible for Lifeline, the ETC must provide a 30% monthly discount to its local rate to that customer for a period of 12 months at the ETC's expense?

<u>Cox Response</u>: Yes. Cox Florida Telcom, LP understands that pursuant to section 364.105 of the Florida Statutes a 30% monthly discount to the local exchange service rate must be provided to former Lifeline customers for a period of 12 months.

#### DR-15:

Does Cox maintain separate books/general ledgers for each state that it operates in?

Cox Response: Yes.

# DR-16:

Provide the number of requests for service from potential customers in Florida that went unfulfilled by Cox in the previous calendar year.

Cox Response: Cox has only recently begun to maintain detailed records of all requests for service from potential customers that went unfulfilled and consequently cannot provide the requested data for 2011. However, Cox would note that during 2011 it received new service requests from potential customers at approximately new subdivisions that Cox currently does not serve. There are currently total homes at these locations.

# DR-17:

Please provide the link (URL) to the Cox website which describes Cox's Lifeline program.

<u>Cox Response</u>: Both general information about the Lifeline program and a PDF of the Lifeline application will be available on the www.cox.com Florida website. The FL website will mirror the format and layout for Lifeline service currently available on the Cox Middle GA website (http://ww2.cox.com/residential/middlegeorgia/phone/middlega-lifeline.cox). The Lifeline PDF application is located on the right hand navigation bar under "Quick Links."

# DR-18:

What recurring and non-recurring costs will a new Lifeline customer incur from becoming a Cox customer and over a year's period?

<u>Cox Response</u>: For local exchange telephone service Cox Florida Telcom, LP will impose no unique costs or charges on its LifeLine customers.

#### DR-19:

In Cox's applications, it is stated that Cox, "... through local subsidiaries, provides competitive telephone service to approximately 3 million customers, offering local and long distance service to both residential and commercial customers." How much service is provided through "local subsidiaries"? What does local mean when stating local subsidiaries? Which subsidiaries does Cox work with in Florida?

<u>Cox Response</u>: Cox has a corporate entity certificated by the appropriate State Commission in each of the states in which it provides telephone service. As one example, in Oklahoma the certificated provider of telephone service is Cox Oklahoma Telcom, LLC. These entities are the "local subsidiaries" referenced in Cox's application which provide service to approximately 3 million customers. In Florida, Cox Florida Telcom, LP is the provider of telephone service within the state.

#### DR-20:

Also in the application it says, "service to approximately 3 million customers, ...". Is that referring to customers in Florida? Lifeline customers? Total number of customers?

<u>Cox Response</u>: The statement in the application refers to the total count of telephony customers in Cox's nationwide footprint, including both residential and commercial customers.

#### DR-21:

"Cox, as a facilities based carrier, provides these services almost exclusively over the company's own telephone facilities, including switches, loops and intercarrier transport." Specifically, what is meant by almost exclusively? Which services are provided using other facilities? Which services are provided otherwise?

Cox Response: By almost exclusively, Cox means that throughout its nationwide footprint it typically owns the entire network infrastructure used to connect the end user's premises to the point of interconnection with another carrier to complete calls on the public switched telephone network. In very limited and select locations, Cox may utilize leased facilities of another carrier to reach specific end user locations. The typical scenario would involve the purchase of leased facilities — which could include loops and/or interoffice transport loop — to reach an out of footprint business location for a business with multiple locations. In this scenario, Cox may serve the predominance of the business locations but needs to reach a remote location to be able to serve the customer's entire business needs.

#### DR-22:

Cox states it has 3 million customers, in one area of its application and then it states that it has 6 million customers in another area. Please explain.

<u>Cox Response</u>: The 3 million customer reference in Section I of the application refers to Cox's count of telephone subscribers in all the states in which it operates. In contrast, the statement in Section IV (3) refers to Cox's total nationwide subscriber base including customers purchasing, video, internet, and voice services.

# DR-23:

Cox states it is a CLEC and an IXC in Florida. Is Cox aware that ICX certificates are no longer necessary or valid in Florida, as Florida no longer has regulatory authority for IXCs?

<u>Cox Response</u>: Yes, Cox is aware that the FPSC no longer has regulatory authority for IXCs and that IXC certificates are no longer valid or necessary in Florida.

# DR-24:

Where are the Cox owned facilities located?

Cox Response: As noted in its application, Cox provides service in the Pensacola, Ft. Walton Beach, and Gainesville/Ocala areas. Cox owns the entire hybrid fiber coaxial network throughout its footprint in these locations. This is the network infrastructure used to serve end user customers – the outside plant in traditional telephony terms. Cox also owns the equipment located in its Master Telecommunications Centers (MTCs) located in Pensacola and Gainesville. The MTCs are central hubs in Cox's network architecture and house a variety of equipment which performs switching, cross-connect, and multiplexing functions. Additionally, Cox owned equipment located in Atlanta, Georgia provides centralized call control intelligence for establishing, maintaining, and routing voice calls.

#### DR-25:

Cox states it will monitor traffic for traffic spikes within its network. How does Cox currently and how does Cox plan to monitor that traffic?

Cox Response: To clarify, Cox does not monitor traffic specifically looking for traffic spikes, but instead, monitors ongoing utilization patterns and regularly adjusts the size of its voice network and carrier interconnections to reflect trends; this ensures that sufficient network capacity exists to support normal, forecasted cyclical peaks in traffic volume. Cox has deployed robust testing and service monitoring platforms to support the voice services it provides to Florida subscribers. Cox also has the ability to identify acute impairments to voice network performance, whether caused by external network failures or emergency situations. In the event that Cox experiences a spike in traffic related to weather or civil emergencies that impacts call completion, Cox has the ability through its flexible switching platform to quickly re-route all or many calls from the impacted region using alternate connections through non-

impacted Cox markets and service areas. Cox's ability to re-route incoming calls and local calls within an impacted area may be limited by the capacity, health, and limitations of other carriers' networks.

# DR-26:

Regarding comparable local service plans, Cox states that it has offered multiple plans that meet the requirement. Does that mean that Cox no longer offers those plans? Will there be Lifeline specific plans for qualified customers to choose from?

Cox Response: Cox Florida Telcom, LP has offered, and continues to offer, multiple plans that include local telephone usage. These plans have evolved over time with changes in features offered and calling areas included in the plans. Cox currently offers three different plans in Florida that are differentiated by the features and long distance usage included. These are described in Cox's tariff on file with the Commission (see Florida Price List No. 1—Sections 3 and 7). Cox does not offer LifeLine specific plans. A Lifeline customer may choose any of Cox's current offerings and the standard monthly rate will be reduced by the reimbursable Lifeline discount of \$12.75

#### DR-27:

There is no mention of Tribal lands in the Cox application. Does Cox have plans to offer Lifeline services in Tribal areas? Are tribal lands included in Cox's service area?

<u>Cox Response</u>: Cox does offer LifeLine service in Tribal areas in some states. However, no tribal lands are included in Cox's service area in Florida.

# DR-28:

Describe Cox local usage plans pursuant to 47 C.F.R. 54.101(a). If phone service is offered in a bundled package, please describe and enumerate the wireline local component (charge for local phone service) for which universal service compensation would be based on.

<u>Cox Response</u>: All Cox Florida Telcom, LP's telephone packages include the tariffed local line rate of \$13.68, which includes unlimited local calling within designated Local Calling Areas. For all Cox Florida Telcom, LP residential customers, including Lifeline customers, the need for minutes of use would be obviated by the unlimited local calling included in the tariffed local line charge. Likewise, any bundled package includes a primary line with unlimited local calling.

# DR-29:

Please provide the name of the person and/or entity which will be filing the Form 497 with USAC if Cox obtains ETC status.

<u>Cox Response</u>: Form 497s will be filed with USAC by Leslie McLaughlin, Regulatory Analyst with Cox Communications.

#### DR-30:

Please provide Cox's purpose for requesting ETC status in Florida. What does the company hope to achieve?

<u>Cox Response</u>: In requesting ETC status, Cox Florida Telcom, LP is looking to expand its customer base by adding new customers from the low income population. This expansion will allow the company the opportunity to market its suite of services to these new subscribers. Since the ILECs with whom Cox competes currently have a Lifeline offering while Cox does not, Cox can also achieve another measure of competitive parity with grant of its application. Finally, Cox believes the offering of a LifeLine benefit will continue to enhance the positive corporate image that Cox has established in the communities that it serves.

[No number 31 in FPSC data request]

# DR-32:

Does Cox provide any services to its customers via a prepaid service? If so, what percentage of its customers receive their service via a prepaid service?

Cox Response: No.

#### DR-33:

Are customers who reconnect service with the company required to pay the past due bill and a reconnection fee prior to receiving service? Are Lifeline customers allowed to pay past due amounts over time? Are Lifeline customers charged a reconnection fee?

<u>Cox Response</u>: As stated in Cox Florida Telcom, LP's Price List on file with the FPSC, Cox may refuse service to an applicant or Customer who has not paid for prior service or has a current past due balance for service rendered by a Cox affiliate. Cox's policy is to require customers to remit one-half of the past-due balance prior to activation of service, and the remainder will be assessed on the customer's first bill. Additionally, Cox's customers may arrange for a deferred payment agreement in order to restore service. Customers are allowed two installments: the first installment is made prior to restoral, and the second is assessed on the first bill rendered after reconnection. Currently, Cox's customers are charged a reconnection fee to restore service.

#### DR-34:

Will Cox advertise Lifeline availability in more than the English language?

Cox Response: It is currently planned to offer Lifeline materials only in English in Florida.

#### DR-35:

Will Cox be using any sub-contractors (operations, call centers, etc.) to provide the required service? If so, please provide the name of each company and physical address.

<u>Cox Response</u>: Cox uses a variety of vendors to supplement in-house personnel to provision and maintain its telephony product. Cox's primary use of sub-contractors to provision its telephony product

would be in the construction of its hybrid fiber coax network utilized to serve its end user customers and in field service installation. Cox also uses contractors in other functional areas of the business. The primary contractors used in these major functional areas are identified in the table below. The list does not include contractors used in other business areas (i.e. janitorial services).

| Contractor/<br>Subcontractor Name | Function | Address |
|-----------------------------------|----------|---------|
|                                   |          |         |
|                                   |          |         |
|                                   |          |         |
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|                                   |          |         |

DR-36:

Please elaborate on what Cox believes to be the Florida PSC's authority to grant ETC designation to cable/VoIP provider.

Cox Response: Section 364.013, F.S., provides:

364.10 Lifeline service.—

(1)(a) An eligible telecommunications carrier shall provide a Lifeline Assistance Plan to qualified residential subscribers, as defined in the eligible telecommunications carrier's published schedules. For the purposes of this section, the term "eligible telecommunications carrier" means a telecommunications company, as defined by s. <u>364.02</u>, which is designated as an eligible telecommunications carrier by the commission pursuant to 47 C.F.R. s. <u>54.201</u>.

For purposes of designation as an ETC by the Florida Commission, Cox is a "telecommunications company" as defined by Section 364.02(13), Florida Statutes. Specifically, in accordance with Section 364.02(13), F.S., Cox provides "two-way telecommunications service to the public for hire" within the State of Florida.

Staff's Data Request #36 suggests concern that Cox might not fit the definition of a "telecommunications company" by virtue of the platform by which it provides service. Cox, however, believes that is not the case, nor the Legislature's intent. To the contrary, Section 364.02(12), Florida Statutes, clearly states that "service" is to be construed broadly and in the most inclusive sense. Notably, while this section indicates that broadband and VoIP service are excluded from the definition of "service" for "purposes of regulation by the commission," no where in the statutes does the Florida Legislature suggest that carriers providing service via such platforms are not, or cannot, be considered "telecommunications companies." Instead, the language set forth in Section 364.02(12) merely clarifies that the Commission cannot regulate the rates or service quality of VoIP-based services. Moreover, the service Cox provides to customers in Florida meets the definition of "basic local telecommunications service" as set forth in Section 364.02(1), Florida Statutes.<sup>1</sup>

The Florida Legislature clearly did not intend to preclude a carrier such as Cox from being considered a "telecommunications company" for purposes of ETC designation. To the point, the definition of a "telecommunications company" as set forth in Section 364.02(13), F.S., includes a list of carriers and providers that are expressly excluded from the definition. This list includes CMRS (wireless) providers, data networks, OSS providers, IXCs and cable television companies providing television service. This listing of excluded carriers provides no language indicating that there may be other possible exclusions nor any clause that would suggest that it is merely a list of examples of the types of companies excluded from the definition. As such, the plain language used indicates it is an exclusive list. Because carriers, such as Cox, are not specifically included on that list, the plain language chosen by the Florida Legislature demonstrates that they did not intend to preclude companies such as Cox from being considered "telecommunications companies" under Florida law. To the contrary, the Legislature intended that such companies may be considered "telecommunications companies," but, as noted herein, reinforced that any VoIP-services that such companies provide are not subject to the Commission's general regulatory oversight.

<sup>&</sup>lt;sup>1</sup> Cox's services are, in fact, voice-grade, and provide dial tone, with local usage necessary to place unlimited local calls. Cox offers single line, flat rate residential service with dual tone, multifrequency dialing and the ability to access emergency services, such as 911, IXCs, directory assistance, operator services, and relay services. In addition, Cox has had its telecommunications services tariffed with the Florida PSC since well before January 1, 2005; thus its tariffed services could not be considered "broadband services" under Section 364.02(2), F.S.

It should not be overlooked that Cox has been certified in Florida as a "competitive local exchange company" or CLEC.<sup>2</sup> In awarding certification as a CLEC to Cox, the Commission has made a determination under Section 364.335, F.S., that the company has the "managerial, technical, and financial ability to provide telecommunications service," which would be difficult to assess if the Commission did not contemplate that the service the company is providing or plans to provide amounts to "telecommunications service." Likewise, this same provision contemplates that once a certificate is awarded, the certificated entity is considered a "telecommunications company" under Florida law, because only a "telecommunications company" can cancel its certificate.<sup>3</sup>

Finally, the Florida Commission has already designated a VoIP-based carrier as an ETC. On March 25, 2005, the Commission issued Order No. PSC-05-0324-PAA-TX designating Knology of Florida, Inc. (Knology) as ETC in Florida. In that Order, the Commission concluded:

We find in this case, ETC designation will <u>promote competition by enhancing choice</u> among service providers and will in addition, facilitate network build-out. The provision of telecommunications through a new medium, in this instance cable telephony, is just <u>what Congress had hoped for</u> when it passed the Telecommunications Act of 1996. We find that granting Knology ETC status furthers the goal that <u>all providers of telecommunications services be treated fairly</u>, and <u>ensures the availability of basic local telecommunications services</u> to all consumers in the state <u>at reasonable and affordable prices</u>. [Emphasis added].

Order at p. 5. In reaching this conclusion, the Commission relied upon Section 364.025(3), F.S., for its authority, explaining that this provision allowed the Commission to consider the application of a "competitive local exchange telecommunications company" to be the "universal service provider and carrier of last resort," which - at the time - was the Florida law equivalent of an ETC. While the statutes have been modified since that decision, the Commission nonetheless had to reach a conclusion in that case that the CLEC ETC-applicant would provide "high-quality, reliable service." Cox emphasizes that, although the definition of "service" in the law has changed somewhat since 2004-2005, both versions of the definition specifically state that the term does not include "voice-over-Internet protocol service for purposes of regulation by the commission." Thus, in granting Knology designation as an ETC in 2005, the Commission must have interpreted the exclusion of VoIP from the definition of "service" to only preclude Commission regulation of those services, as plainly intended by the Legislature. The Commission did not view designation as an ETC pursuant to 47 C.F.R. s. 54.201 to constitute regulation of the underlying services provided via VoIP platform.<sup>5</sup> In addition, the policy rationale set forth in the Knology case is equally applicable to the instant case – designation of Cox as an ETC will ensure fair treatment of telecommunications carriers in Florida and will ensure that consumers have choices available to them.<sup>6</sup> Likewise, as Cox has noted in its recent Petitions to the Florida Commission, Florida is

<sup>&</sup>lt;sup>2</sup> Section 364.02(5), F.S.

<sup>&</sup>lt;sup>3</sup> Section 364.335(3), F.S.

<sup>&</sup>lt;sup>4</sup> Section 364.025 (5), F.S. (2004)(emphasis added).

In fact, Knology's petition specifically states, "Knology provides services over its wholly owned, fully upgraded 750 MHz interactive broadband network." Petition in Docket No. 041302-TX, at page 2. See also, Knology's Response to Staff Data Request No. 4 in the Docket, stating service would be provided over "Hyber-Fiber Coax Broadband Networks."

<sup>&</sup>lt;sup>6</sup> While the Legislative intent set forth in Section 364.01, F.S., has also changed somewhat, it nonetheless provides that:

The Legislature finds that the competitive provision of telecommunications services, including local exchange telecommunications service, is in the public interest and has provided customers with freedom of choice, encouraged the introduction of new telecommunications service, encouraged technological innovation, and encouraged investment in telecommunications infrastructure.

a net contributor to the USF. Denying, or delaying, Cox's ability to access the Fund in order to provide service in Florida would be contrary to the State's interests.

In sum, the Florida PSC is authorized to designate Cox an ETC as it is a "telecommunications company" under Florida law, and otherwise meets the criteria for designation as an ETC.

Bill for March 02, 2012

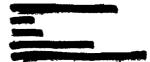
Page 1 of 4

2205 LaVista Avenue Pensacola, FL 32504

6400 0310 NO RP 03 03032012 NNNNNNNN 01 002624 0009



Account Number PIN Service at



# 



Contact Us www.cox.com Sales/Billing 866-272-5777 Tech Support 866-272-5111



Thank you for being a valued Cox Communications customer. Your patronage is greatly appreciated. Please visit us online at ww2.cox.com/business

# ACCOUNT SUMMARY as of Mar 2, 2012

Previous Balance

Payment Received - Feb 24

**New Charges** 



TOTAL DUE BY Mar 24, 2012

\*\*Auto Payment On Your Due Date-Do Not Send Payment\*\*



Cox Business LD Rate Changes

Effective with your next bill statement, for the plans listed below a Call Setup Fee of \$0.0125 per call will be added and the initial billing increment will change to 30 seconds. Rates for the 30 second increment vary by plan and are listed online on www.Cox.com/business. Affected plans include: Default Rate (no long distance plan selected); CB 10 Cent LD; CB 15 Cent LD; Cox 5 Cent; Cox Flex T-1 3.8 LD; Cox Office Solutions; Enterprise; Solution; Cox Long Distance Advantage; Cox LD Select and Interstate per-minute plans at 5 cents and above; excludes Minute packs and Unlimited Plans.



Go green! Visit www.cox.com and click on View/Pay Bill today to stop your paper bill!

**ECO** ENG GCL IDM (TEL)

CLK

01033001214007127801370013688

March 02, 2012 bill for Account Number Service at

\*\*Auto Payment On Your Due Date-Do Not Send Payment\*\*

TOTAL DUE BY Mar 24, 2012

\$136.88

Cox Communications, Inc. PO BOX 9001077 **LOUISVILLE KY 40290-1077** 

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FPSC-COMMISSION CLERK

SUMMARY OF CHARGES

**Monthly Services** 

Taxes, Fees and Surcharges

**NEW CHARGES** 

MONTHLY SERVICES Mar 5 - Apr 4

INTERNET

CBI Select 10 Mbps x 2 Mbps2.0

Total Internet

**TELEPHONE** 

352-215-8609

VoiceManager Flat Rated Local Line

Network Interface Fee - Single Line

**Directory Listing-Published** 

VoiceManager Basic Package

VoiceManager Unified Messaging

VoiceManager Standard Mailbox

Cox Nickel Call Plan - 3 Year

**Total Telephone** 

**TOTAL MONTHLY SERVICES** 

**USAGE CHARGES** 

Telephone Usage

Total Telephone Usage

**TOTAL USAGE CHARGES** 

TAXES, FEES AND SURCHARGES

Telephone Taxes, Fees and Surcharges

Federal Excise Tax

Local Tel Communications Srv Tax

State Tel Communications Srv Tax

**Total Taxes** 

Fees and Surcharges

Federal Universal Service Fund

Carrier Cost Recovery Fee

**Total Fees and Surcharges** 

Total Telephone Taxes, Fees and Surcharges

**TOTAL TAXES, FEES AND SURCHARGES** 

**TOTAL NEW CHARGES** 

**TELEPHONE USAGE DETAILS for 352-215-8609** 

Cox Long Distance

Place

Number

Min: Rate/

Sec Time

**Amt** 



Payment options

Online: Visit <u>www.cox.com</u> to register for 24-hour online access or make payments to your account.

Mail: Detach this coupon and send it with your check or money order. Please include your account number on your check. Make your checks payable to Cox Communications. Allow 7 days for processing.

Phone: Call the number listed under the "Contact Us" section on the front of this bill anytime and follow the phone prompts to make a payment using your bank account or credit card.

In Person: Visit www.cox.com for a list of Cox Authorized Payment Centers.





Bill for March 02, 2012
Account number

Page 3 of 4



#### Rate Codes

DD = Direct Dial

#### Time Codes

D = Day

E = Evening

N = Night/Weekend

#### **CUSTOMER INFORMATION**

#### Advance Billing

Cox Communications bills all customers in advance for monthly recurring charges and in arrears for non-recurring charges such as On Demand/Pay-Per-View and long distance. Credits or charges for any service changes made during the month will be reflected in the next bill.

#### When to Pay Your Bill

Payment in full is due to Cox by the "Due By" date indicated on your statement. If payment is not received by this date, your bill will become past due and may be subject to additional fees such as late payment charges, electronic reactivation fees, or returned check fees. For more information on these fees and all other charges,

# Customer Information cont. please visit <u>www.cox.com</u>.

# **Understanding Your Cox Bill**

Having trouble understanding your Cox bill? Visit <a href="http://www.cox.com/support">http://www.cox.com/support</a> for help or contact a Customer Care Representative. Contact information is listed under the "Questions?" section on the front of this bill.

# Returned Check Charge

Payments returned to Cox due to insufficient funds will incur a non sufficient funds fee (NSF) of up to \$30.00 or the maximum allowed by state law. The use of a paper or electronic check for payment is your acknowledgement that if your payment is returned, you expressly authorize your account to be electronically debited for the amount of the payment plus any applicable NSF fees. For more information regarding this fee, visit <a href="https://www.cox.com">www.cox.com</a>

#### **Basic Local Telephone Service**

In order to avoid disconnection of your basic local telephone service, you must pay all charges on your account.

#### 911 Services

If your modem is disconnected or moved, or its battery is not charged or otherwise fails, phone service, including access to 911 services will **not** be available.

Please review the following website for additional important information about Cox's 911 practices: http://ww2.cox.com/business/voice/regulatory.cox

## Cox Long Distance

If you have questions concerning rates or terms and conditions of your Cox interstate or international long distance services, please refer to the Customer Services Agreement on our website at <a href="https://www.cox.com/telephone/customerservicesagreement.asp.">https://www.cox.com/telephone/customerservicesagreement.asp.</a>
For questions concerning the rates or terms and conditions of your Cox intrastate long distance services, please refer to the Cox Florida Telcom, L.L.C. Long Distance Tariff, or see prices on-line at <a href="https://www.cox.com">www.cox.com</a>.

# Billing Dispute and Resolution

If you have any questions regarding your bill or disagree with any portion of your bill, immediately contact Cox with your concerns. You must contact us no later than 60 days from the bill's due date via the contact information listed on the front of this bill so that Cox can review your account.

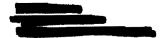
To dispute the outcome related to your cable service, you may file a complaint with your local franchising authority (PLEASE DO NOT SEND PAYMENTS TO THIS ADDRESS): Florida Dept of Agriculture, 2005 Apalachee Parkway, Tallahassee, Florida 32399-6500



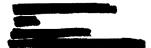


(NOT FOR PAYMENTS) 2205 LA VISTA AVENUE PENSACOLA, FL 32504

6400 0040 NO RP 14 07162012 NYNNNNNY 01 003015 0011



Account Number PIN Service at



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Contact Us www.cox.com 850-478-0200



Thank you for being a Cox Communications customer!

ACCOUNT SUMMARY as of Jul 15, 2012

Previous Balance

Payment Received - Jul 6

**New Charges** 

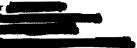


**TOTAL DUE BY Aug 3, 2012** 

Save Time! Save Money! Take control! Enroll in EasyPay once you set it you'll never forget it. Your bill is automatically paid each month on the day it's due. Visit www.cox.com/easypay to sign-up.

> **ECO ENG** GCL

July 15, 2012 bill for Account Number Service at



There's an easier way to pay your Cox bill! With EasyPay you can have your monthly Cox bill paid automatically from the bank or credit card account you choose. Visit <u>www.cox.com</u> for more information.

**TOTAL DUE BY Aug 3, 2012** 



COX COMMUNICATIONS PO BOX 9001078 LOUISVILLE KY 40290-1078

04891 JUL 20 º

01032001135002450801800015643

**EPSC-COMMISSION CLERK** 

Page 2 of 4

#### SUMMARY OF CHARGES

Monthly Services

Usage Charges

Taxes, Fees and Surcharges

NEW CHARGES

MONTHLY SERVICES Jul 14 - Aug 13

TV

Cox Advanced TV Premier

Includes:

Faith & Values Pak

Cox TV Starter

**Expanded Service** 

Advanced TV

Movie Pak (Movie Tier)

Sports & Information Pak

Variety Pak

Bonus Pak

2 Premium Package

Includes:

HBO

Showtime

НВО

Showtime

2 Premium Discount

Aug 1-Aug 13

Advanced TV HD Receiver

Total TV

INTERNET

Cox High Speed Internet Preferred

A

Payment options

Online: Visit cox.com to register for 24-hour online access

or make payments to your account.

Mail: Detach this coupon and send it with your check or money order. Please include your account number on your check. Make your checks payable to Cox Communications.

Allow 7 days for processing.

Phone: Call the number listed under the "Contact Us" section on the front of this bill anytime and follow the phone prompts to make a payment using your bank account or

credit card.

In Person: Visit <u>www.cox.com</u> for a list of Cox Authorized

Payment Centers.

Monthly Services cont.

Includes:

Cox High Speed Internet Preferred with

**PowerBoost** 

Total Internet

TELEPHONE

850-457-0252

Cox Digital Telephone Premier

Includes:

Basic Monthly Service

Cox Long Distance

Cox In-State Long Distance

Cox State-to-State Long Distance

Voice Mail

Premier Feature Pak

Unlimited Connections Package

Directory Listing - Published Anonymous Call Rejection Federal Excise Tax Credit FCC Access Charge

Total Telephone

TOTAL MONTHLY SERVICES

USAGE CHARGES

Telephone Usage

Usage for

Call Plan (qty 8)

Total Telephone Usage

**TOTAL USAGE CHARGES** 









# TAXES, FEES AND SURCHARGES

TV Fees County Tax

FCC Fee

State Communications Service Tax Local Communications Service Tax

State Sales Tax

Total TV Fees

Telephone Taxes, Fees and Surcharges

Taxes

Federal Excise Tax

Local Tel Communications Srv Tx State Tel Communications Srv Tx

Lifeline and Relay Fee

E-911 Tax

**Total Taxes** 

Fees and Surcharges

Carrier Cost Recovery Fee Federal Universal Service Fund

**Total Fees and Surcharges** 

Total Telephone Taxes, Fees and Surcharges

TOTAL TAXES, FEES AND SURCHARGES

#### **TOTAL NEW CHARGES**



#### **CUSTOMER INFORMATION**

Advance Billing

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**Understanding Your Cox Bill** 

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#### **Electronic Fund Transfer (EFT)**

When you provide a check as payment, you authorize Cox to make a one time electronic fund transfer (EFT) from your account, using the information from your check, or process your payment as a traditional check transaction. An EFT may debit your account as soon as the same day you make your payment and you will not receive your check back from your financial institution.

Returned Check Charge

Payments returned to Cox due to insufficient funds will incur a non sufficient funds fee (NSF) of up to \$30.00 or the maximum allowed by state law. The use of a paper or electronic check for payment is your acknowledgement that if your payment is returned, you expressly authorize your account to be electronically debited for the amount of the payment plus any applicable NSF fees. For more

#### Customer Information cont.

information regarding this fee, visit www.cox.com

Closed Captioning Issues

For issues regarding closed captioning, please contact Cox customer service at the number listed at the front of this bill. If your concerns are not addressed, please contact: S.T. Willis, Mgr of Closed Captioning, Cox Communications, 1400 Lake Hearn Dr NE, Atlanta, GA 30319; Phone: 1-888-278-6660, Fax: 404-847-6257, Email:closedcaption@cox.com

**Basic Local Telephone Service** 

In order to avoid disconnection of your basic local telephone service, you must pay all charges on your account.

Telephone Modem and Battery Back-Up

If your modem is disconnected or moved, or its battery is not charged or otherwise fails, phone service, including access to emergency 911 services will not be available.

Cox Long Distance

If you have questions concerning rates or terms and conditions of your Cox interstate or international long distance services, please " refer to the Customer Services Agreement on our website at https://www.cox.com/telephone/customerservicesagreement.asp. For questions concerning the rates or terms and conditions of your Cox intrastate long distance services, please refer to the Cox Florida Telcom, L.L.C. Long Distance Tariff, or see prices on-line at www.cox.com.

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