

120165-TP



GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

May 31, 2012

HAND DELIVERY

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

RECEIVED-PPSC
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COMMISSION
CLERK

Re: New Filing - Application of Cox Florida Telcom, LP 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.

Dear Ms. Cole:

Enclosed for filing, please find an original and seven (7) copies of Cox Florida Telcom, LP's Petition for Designation as an Eligible Telecommunications Carrier. Under separate cover, Cox is submitting certain confidential exhibits with a Claim of Confidentiality, pursuant to Rule 25-22.006(5), F.A.C.

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Application of Cox Florida Telcom, LP)
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.)

Docket No. 120165-TP

Filed: May 31, 2012

**PETITION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
CARRIER BY COX FLORIDA TELCOM, LP**

Cox Florida Telcom, LP (d/b/a “Cox Communications,” “Cox Business,” collectively “Cox”), by its attorneys, hereby requests that the Florida Public Service Commission (“FPSC” or “Commission”), pursuant to Section 214(e) of the federal Communications Act of 1934¹ and consistent with Section 364.10, Florida Statutes, designate Cox as an eligible telecommunications carrier (an “ETC”) throughout its non-rural service territory within the state of Florida for the sole purpose of receiving low income universal service support. As demonstrated herein, designation of Cox as a LifeLine only ETC would be consistent with the purposes and requirements of Section 214(e) and will meet the goals of the federal Universal Service program. Cox’s ETC designation will serve the public interest by furthering the provision of competitive choices of wireline telephone service to low income consumers in Florida. In support of this Petition, Cox states as follows:

I. Introduction

1. Cox Florida Telcom, LP is the holder of a Competitive Local Exchange Carrier (CLEC) certificate in Florida and is also registered as a long distance service provider (IXC) in Florida. Cox’s parent company, Cox Communications, Inc., through local subsidiaries, provides

¹ 47 U.S.C. § 214(e).

competitive telephone service to approximately 3 million customers, offering local and long distance service to both residential and commercial customers. Cox, as a facilities based carrier, provides these services almost exclusively over the company's own telephone facilities, including switches, loops and intercarrier transport. Cox has consistently been recognized for its product and customer service leadership by independent third parties and industry organizations. For example, the company has been ranked highest among video, internet, phone and business data service providers 26 times by J.D. Power and associates since 1996. The name and mailing address of the Petitioner is:

Cox Florida Telcom, L.P.
Attention: Ken Culpepper
1400 Lake Hearn Drive
Atlanta, GA 30319

2. The names and mailing addresses of the persons authorized to receive notices and communications with respect to this petition are:

Beth Keating, Esq.
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, Florida 32301-1839

Mr. Kenneth Culpepper
Director, Regulatory Affairs FL/GA/LA
Cox Communications
1400 Lake Hearn Drive
Atlanta, GA 30319

3. Cox has been providing local and long distance telephone service to residential and commercial customers in Florida since 2005. Cox's tariff for the provision of local exchange and LD service is on file with the Commission as Florida Price List No. 1. Cox provides service in the Pensacola, Ft. Walton Beach and Gainesville/Ocala areas and its service territory includes significant areas where low income families live. While Cox serves many business customers, its customer base is primarily residential and the vast majority of Cox's customers are families and individuals.

4. As described below, Cox is qualified to be an ETC for federal low income support under both the terms of the federal Communications Act and the relevant FCC guidelines and requirements. Cox's qualifications to be an ETC have been recognized by various state commissions in various ETC application proceedings. Cox is fully committed to meeting the requirements for the federal Universal Service low income program throughout Cox's non-rural service territory in Florida. Further, Cox affiliates successfully participate in the High Cost, Low Income, Schools and Libraries, and Rural Health Care programs in several states.² Granting Cox ETC status pursuant to this petition will serve the public interest because it will expand the opportunities for low income customers in Florida to have a choice of wireline telephone carriers and afford them the benefits of competition, including lower prices and advanced services.

II. The Cox Request

5. By this petition, Cox seeks designation as a competitive eligible telecommunications carrier ("CETC") under the federal programs that support service to low income customers in Florida.³ This petition covers Cox's entire non-rural service area in the Florida exchanges listed in Attachment B. A service area map of Cox's current non-rural service area in Florida is included in this application as Attachment C. As Cox increases the scope of its service area in the future, any ETC designation granted by this request would cover any additional non-rural territory that Cox serves as a consequence of that increase in scope.⁴

² Attachment A reflects those states in which Cox has been granted ETC status. In California, Cox participates in the state administered high cost fund and Life Line and Link Up Fund.

³ The federal low income program is defined in Section 54.401 of the FCC's rules. See 47 C.F.R. § 54.401. This certification request covers this program, any successor program and any additional programs of support for low income customers that may be created in the future.

⁴ Cox continually evaluates new build opportunities and expands its network when it is economical to do so. Network expansion may also occur as a result of buildout requirements in franchise agreements.

III. The Framework for Consideration of ETC Applications

6. ETC applications are governed by the requirements of Section 214(e) of the Communications Act, and the FCC Rules set forth in 47 C.F.R. Part 54. In fact, in 2005 the FCC adopted numerous guidelines that it suggested states consider when evaluating ETC applications.⁵ While the FCC guidelines are not generally presented as mandatory by the FCC, they do provide an appropriate general framework for consideration of the issues raised in the ETC certification process. Moreover, to the extent that the FPSC has adopted these FCC guidelines as mandatory requirements for ETC designation in the state, Cox acknowledges that these requirements are mandatory for purposes of an ETC application for Florida.⁶ It should be noted that the general framework for consideration of ETC applications has not, until recently, differentiated between applications seeking high cost support and those seeking only low income support. However, the FCC's recent Report and Order and Notice of Proposed Rulemaking in the Dockets addressing the Universal Service and Intercarrier Compensation reform ("USF/ICC Transformation Order") and the Report and Order and Notice of Proposed Rulemaking addressing Lifeline and Link Up Reform and Modernization ("Lifeline Reform Order") have now established different requirements that apply when considering high cost versus Lifeline only applications.⁷ In particular, low income only applications, as explained more fully below, do not raise some of the concerns historically addressed by the FCC in its various ETC decisions.

⁵ 47 U.S.C. § 214(e); Federal-State Joint Board on Universal Service, *Report and Order*, 20 FCC Rcd 6371, 6396 (2005) ("*ETC Guidelines Order*").

⁶ See, for instance, Order No. PSC-05-0824-FOF-TL, issued in Docket No. 010977-TL.

⁷ See, , WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 26 FCC Rcd 17663 (2011) (USF/ICC Transformation Order or Order); pets. for review pending sub nom. In re: FCC, No. 11-9900 (10th Cir. filed Dec. 8, 2011). **and** In the Matter of Lifeline and Link Up Reform and Modernization (WC Docket No. 11-42), Lifeline and Link Up (WC Docket No. 03-109), Federal-State Joint Board on Universal Service (CC Docket No. 96-45), Advancing Broadband Availability Through Digital Literacy Training (WC Docket No. 12-23), Report and Order and Further Notice of Proposed Rulemaking. Order No. FCC 12-11. Adopted: January 31, 2012, Released: February 6, 2012.

7. Under Section 214(e), state commissions designate ETCs unless they lack the authority to do so under state law.⁸ To designate a carrier as an ETC, the state must find that the carrier:

- Will provide the services supported by the universal service program throughout its designated service area, either by using its own facilities or reselling another carrier's services; and
- Will advertise the availability of its services.⁹

The state commission defines the carrier's service area through its normal processes, except in the case of rural telephone companies, whose service areas are their FCC-defined study areas.¹⁰ However, state commissions have the authority and latitude to grant ETC status in less than the entire study area of a rural carrier. In addition, state commissions are required by Section 214(e) to designate multiple ETCs in non-rural areas if more than one carrier applies and meets the statutory standards, and are permitted to designate multiple ETCs in rural areas when they determine that doing so is in the public interest.¹¹

8. In regard to the public interest determination, this Commission has determined that it will make an affirmative determination that designation is in the public interest before designating a carrier as an ETC, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier. The Commission has also noted that, historically, public interest standards for ETC designation are higher in rural areas, and that state commissions may therefore give more weight to certain factors in the rural context than in the non-rural context. *See infra* Section VI, notes 43 and 44, and accompanying text.

⁸ The FPSC has jurisdiction over Cox as a certificated carrier in Florida.

⁹ 47 U.S.C. § 214(e)(1).

¹⁰ 47 U.S.C. § 214(e)(5).

¹¹ 47 U.S.C. § 214(e)(2).

9. The FCC has adopted some rules to govern the state ETC designation process, and those rules essentially implement the provisions of Section 214(e).¹² Of particular significance to the instant application is the rule precluding state commissions from designating a carrier as a LifeLine only ETC unless the carrier has demonstrated its financial and technical capability of providing the supported Lifeline service.¹³ In addition, the FCC Rules prohibit a state commission from granting ETC status to any company that proposes to serve its entire service area via resale.¹⁴

10. The FCC also has adopted rules for its own consideration of ETC applications. These rules do not bind the states, but they do provide a general outline of issues that might also be considered in a state ETC designation proceeding. As noted in Paragraph 6 herein, the Florida PSC earlier also adopted certain FCC rules in effect at the time of adoption as mandatory requirements for ETC designation in the state. Under the most current relevant FCC criteria,¹⁵ an applicant must:

- Certify that it will comply with the service requirements applicable to the support that it receives.¹⁶
- Demonstrate its ability to remain functional in emergency situations.
- Demonstrate that it will satisfy applicable consumer protection and service quality standards.
- For a Lifeline only applicant, demonstrate its financial and technical capability of providing the LifeLine service.
- For a LifeLine only applicant, submit information describing the terms and conditions of any voice telephony plans offered to LifeLine subscribers.

¹² See 47 C.F.R. § 54.201.

¹³ 47 C.F.R. § 54.201(h).

¹⁴ 47 C.F.R. § 54.201(i).

¹⁵ 47 C.F.R. § 54.202.

¹⁶ This criterion also requires the submission of a five-year service improvement plan; however, such a plan is not required when an applicant seeks designation as a LifeLine only ETC.

The final criterion under both Section 214(e) and the FCC's guidelines is whether designating a carrier as an ETC would serve the public interest.¹⁷ The FCC guidelines have traditionally focused on "the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offering."¹⁸ As further outlined in Section VI, the FPSC has adopted a similar focus in its public interest determinations. In addition, ETC applicants must also commit to publicize the availability of Lifeline service.¹⁹ The FCC rules are intended to ensure that ETC applicants will meet the essential goals of Section 214(e); thus, in many cases they elaborate on the basic outline in the statute. Consequently, an applicant that meets the FCC standards also will meet the statutory requirements.

IV. Cox Meets the Standards for Designation as an ETC

A. Cox Will Meet All Relevant Requirements Under Section 214 and the FCC's Standards.

11. Cox is committed to meeting all of the requirements under Section 214(e) and the relevant FCC guidelines for ETC applications. Cox's commitments are supported by its history of operation in Florida, and in fact Cox already complies with all of the operational aspects of the FCC guidelines today.

1. Provision of Supported Services.

12. Under Section 214(e) and the FCC's guidelines, an ETC must provide the services supported by the universal service program throughout its designated service area, using either its own facilities or by reselling another carrier's facilities. The services designated for support are described in the FCC's rules as follows:

¹⁷ 47 U.S.C. § 214(e)(2).

¹⁸ Prior to the FCC's recent USF/ICC Transformation Order, these guidelines were codified at 47 C.F.R. § 54.202(c). The current Public Interest Standard is now codified at 47 C.F.R. § 54.202 (b) but does not include this level of specificity.

¹⁹ 47 C.F.R. §54.405(b).

Voice Telephony services shall be supported by federal universal support mechanisms. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service areas has implemented 911 or enhanced 911 systems, and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.²⁰

The preceding definition of supported services was adopted in the FCC's recent USF/ICC Transformation Order. In revising the definition the FCC noted that the revisions were intended to shift to a technologically neutral approach. Specifically, the Commission stated:

Rather, the modified definition simply shifts to a technologically neutral approach, allowing companies to provision voice service over any platform, including the PSTN and IP networks. This modification will benefit both providers (as they may invest in new infrastructure and services) and consumers (who reap the benefits of the new technology and service offerings).²¹

While other states have already determined that Cox's service meets the requirements for support, this latest statement by the FCC further clarifies that Cox's VoIP-based, voice telephony service is eligible for support.²²

13. In addition, the Rules require that the ETC offer all of the designated services.²³ Consistent with these requirements, Cox currently offers all of the designated services.

14. First, Cox's standard service offerings, as described in its tariff, on its web site and in other materials available to customers and the Commission, include all of the required elements of supported services other than toll limitation. Toll limitation, while not included in Cox's standard service packages, is available separately to all Cox customers.²⁴ As required by the

²⁰ 47 C.F.R. § 54.101(a).

²¹ FCC USF/ICC Transformation Order at paragraph 78

²² See also, Lifeline Reform Order, at Paragraphs 47-48, adopting new definition of "voice telephony service" for Lifeline support purposes, as well as Paragraph 49, eliminating "local" qualifier from definition of Lifeline service.

²³ 47 C.F.R. § 54.101 (b).

²⁴ See Cox Florida Telcom, LP, Price List No. 1, p. 90 -- Toll Restriction --Customer Initiated. Cox will modify this tariff prior to the effective date of its ETC status to reflect the appropriate waiver of the toll restriction charge as required by the FCC rules. .

FCC's rules, this service will be provided at no charge to LifeLine customers subscribing to service plans which do not include unlimited toll calling.²⁵ Consequently, Cox fulfills the requirement for the specific services to be offered through its current offerings. Additionally, Cox offers these services as a common carrier as that term is defined in the Act.²⁶

15. The second prong of this requirement—that of provision of service throughout the service area for which ETC designation is received—is discussed, *infra*, in Section V(A)(1).

2. Advertising

16. Under Section 214(e), an ETC is required to “advertise the availability of [its] services and the charges therefor using media of general distribution.”²⁷ In addition, as a result of the FCC'S Lifeline Reform Order, additional requirements have been added to 47 C.F.R. § 54.405. These requirements are that materials describing the service shall use easily understood language and indicate that: 1) the service is a LifeLine service; 2) that Lifeline is a government assistance program; 3) that the service is non-transferable; 4) that only eligible consumers may enroll; and 5) that the program is limited to one discount per household.

17. Cox already advertises its services broadly, using not only its own cable operations, but newspapers, billboards, direct mail and other media intended to reach a wide audience in its service area in Florida. Cox will continue to advertise its telephone service, including its LifeLine offering, in all appropriate media, and will comply with the additional advertising requirements now codified at 47 C.F.R. §54.405. In addition, Cox will comply with any additional advertising requirements that may be promulgated by the FCC or the FPSC in the future that is required of all designated ETCs.

²⁵ 47 C.F.R. § 54.401 (a)(2)(a).

²⁶ 47 USC §153(10). See also 47 USC § 214(e); 47 USC §254(c); and 47 C.F.R. § 54.20(d).

²⁷ 47 U.S.C. § 214(e)(1)(B). This same requirement is also codified at 47 C.F.R. § 54.201(d)(2).

3. Financial and Technical capability

18. Revised FCC Rule 54.201(h) states that a state commission shall not designate a common carrier as an ETC for purposes of receiving low income support absent a demonstration of financial and technical capability of providing the supported lifeline service. At paragraph 388 of the Lifeline Reform order, the Commission indicates that relevant considerations for such a demonstration could include whether the applicant previously offered services to non-Lifeline customers, how long it has been in business, whether the applicant intends to rely exclusively on USF disbursements to operate, whether the applicant receives or will receive revenues from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state.

19. Cox has the financial resources to provide Lifeline supported services in Florida. Cox's corporate parent, Cox Communications, Inc., is the third-largest cable entertainment and broadband services provider in the country and is a pioneer in providing the bundle of television, Internet and telephone services. With over 6 million customers and over 22,000 employees, Cox is known as an industry leader. Since 1996, Cox has invested more than \$16 billion in the communities it serves through infrastructure upgrades to deliver video, phone and high-speed Internet service to homes and businesses in the company's service area.

20. As stated in the introduction, Cox already operates as a CLEC and IXC in Florida and along with fellow affiliates of Cox Communication, Inc. provides CLEC and IXC services in a total of eighteen states. Cox received its certificate of public convenience and necessity to operate as a competitive LEC in Florida in 1995 and shortly thereafter began providing competitive local exchange services in Florida. In obtaining its operating authority and operating in the state of Florida for over fifteen years, Cox has demonstrated that it has the financial and

technical capability to provide the supported Lifeline services. Further, Cox is a facilities-based provider. Cox and its affiliates provide a suite of services in Florida, including voice products as well as video and high speed Internet. Cox itself owns network equipment used to provide the supported Lifeline services and also utilizes loop and transport facilities owned and controlled by Cox Communications, Inc. affiliates.

21. Cox has offered and provided local exchange service as well as long distance and ancillary services to non-Lifeline customers since it began providing service in Florida. Cox serves both residential and business customers and derives revenue from providing those services independent of USF funding. While Cox does receive some high cost support in other states as well as Lifeline and Schools and Libraries USF program funding, Cox relies primarily on revenues from customer service charges to operate. Therefore, Cox does not rely exclusively on USF disbursements. Cox has not been subject to any enforcement action or ETC revocation proceedings in any state.

V. Satisfaction of FPSC Designation Criteria and Reporting Requirements

A. Adopted Criteria

22. As discussed below Cox meets each of the specific requirements originally set forth in FCC Rules that have been formally adopted by the Florida PSC:

1. Provision of service throughout proposed designated service area

23. Cox is committed to providing service throughout its service area within a reasonable time if such service can be provided at a reasonable cost. Cox provides service to new customers within its build-out area within industry-standard time frames. Cox typically can serve a customer transferring from another carrier as soon as the telephone number can be ported from

the customer's previous carrier. Cox, as a facilities-based carrier, will provide this service over its own end-to-end facilities, including Cox's loops and switches. Cox also will provide service to customers within the service area requested in this petition but outside the area where Cox has facilities, where such service can be provided at a reasonable cost, as promptly as possible.

24. When the FPSC adopted this particular requirement, the FCC's rules also required submission of a five-year plan showing proposed upgrades and improvements to its network in the relevant areas.²⁸ As noted in Section V(B), a five year plan requirement still remains in the FCC's rules; however, such a plan is now not required when an applicant seeks designation as a Lifeline only ETC. In making this rule change, the FCC has clarified its intentions that five year plan submissions document how high cost support is used to support network improvements. That intention was earlier stated in the *FCC's ETC Guidelines Order* in which the FCC stated that" The five-year plan must demonstrate in detail how high cost support will be used for service improvements that would not occur absent receipt of such support. . . ." ²⁹ Given the foregoing, it is clear that detailed five year network plans are not required in support of low income only ETC applications such as the instant application. More recently, the FCC clearly stated in paragraph 386 of its LifeLine Reform Order that common carriers seeking designation as LifeLine-only ETCs are not required to submit five-year network improvement plan as part of ETC applications. Given Cox's request for Lifeline only designation, Cox has not submitted such a plan with this application.

²⁸. At the time of adoption, this requirement was codified at 47 C.F.R. § 54.202 (a) (1) (ii).

²⁹ See Report and Order in CC Docket No. 96-45 released March 17, 2005 para. 23

2. *Availability in Emergency Situations*

25. Under the FCC's Rules, an applicant for ETC designation should demonstrate "its ability to remain functional in emergency situations[.]"³⁰ This demonstration includes information about back-up facilities, the ability to reroute around damaged facilities and the ability to handle traffic spikes.

26. Cox has designed its network to be resilient in emergencies. From the start, Cox has included back-up power in its network designs to ensure that its customers retain service even when commercial power is unavailable. Cox uses route diversity and other techniques to limit the likelihood that damage to its facilities will cut off service to its customers. Further, Cox's IP-based telephone service includes battery backup in the customer equipment in accordance with industry standards and relevant regulatory requirements.³¹ These features allow Cox to maintain service even when there are substantial power outages within its service area.³²

27. Cox also is compliant with all relevant 911 and E911 requirements. Where E911 is available in a local community, Cox ensures that all necessary information, including location information and callback data, is provided to the local E911 database and available to the PSAP. Cox has provided 911 and E911 since the time it began offering telephone service, and has offered full 911 and E911 capability for both its circuit-switched and IP-based products.

28. Finally, Cox follows industry standard procedures for addressing traffic spikes within its network, including implementing call gapping when appropriate. In addition, Cox seeks to avoid

³⁰ 47 C.F.R. § 54.202(a)(2). This requirement has remained unchanged with recent CFR changes resulting from the USF/ICC Transformation Order.

³¹ Cox has implemented a program for replacement of the backup batteries to ensure that customers do not experience unexpected loss of service.

³² Cox prides itself on its exemplary record of service maintenance and service recovery after hurricane or other natural damage to its network throughout its entire US footprint.

network congestion issues by monitoring traffic on an on-going basis and sizing its network and interconnection facilities to maintain call blocking below industry standard levels.

3. Customer Service Standards

29. The FCC rules call for ETC applicants to demonstrate that they will “satisfy applicable consumer protection and service quality standards.”³³ Cox easily meets these standards.

30. Since it was first authorized to provide service in Florida, Cox has been committed to meeting all applicable customer service requirements, and it reiterates its commitment with this application. This commitment is part of a company-wide effort to maintain the highest possible level of customer satisfaction for telephone, cable and Internet services, and is reflected in the J.D. Power awards that Cox Communications has won since 1996.

31. Cox also will continue to comply with all mandated consumer protection requirements, including the federal Truth-In-Billing rules, advertising requirements, tariffing obligations and state-specific requirements governing customer notices, late fees, disputes and other consumer issues. Cox believes that it is important to treat all of its customers fairly, not just as a matter of business or legal requirements, but because respect for consumers is essential to the company's relationship with its customers.

4. Comparable Local Service Plans

32. When the FPSC adopted this particular requirement, the FCC required an ETC to offer “a local usage plan comparable to the one offered by the incumbent LEC” in the ETC's service area.³⁴ Cox's focus is on consumer-driven telephone products and it has offered multiple plans that meet this requirement since the time it began providing service in Florida and remains

³³ 47 C.F.R. § 54.202(a)(3). This requirement has remained unchanged with recent CFR changes resulting from the USF/ICC Transformation Order.

³⁴ This requirement was formerly codified at 47 C.F.R. § 54.202(a)(4) (2011 edition)

committed to continuing to offer such plans after it becomes an ETC within its Florida non-rural service territory.

33. As of the date of this petition, Cox offers a choice of different plans in Florida that include local telephone usage. The most basic plan covers only local telephone service, but includes unlimited local calling throughout the Pensacola LATA for its greater Pensacola customers and throughout the Gainesville LATA for its Gainesville/Ocala customers.³⁵ Cox also offers packages that include additional local features such as call waiting and voice mail, that bundle a specific number of long distance minutes with various calling features and that bundle an unlimited number of domestic long distance minutes with calling features.³⁶ All of these packages include unlimited local calling within a local calling area at least as large as the incumbent ILEC's calling area. Thus, all of Cox's local telephone service plans meet the requirements of the FCC's guidelines.

5. Equal Access

34. When the FPSC adopted this particular requirement, FCC Rule 54.202 (a)(5) provided that an ETC acknowledge that it could be required to provide equal access to long distance carriers in the future if no other ETC provides equal access in the service area.³⁷ With the latest changes to the FCC's Rules, this specific requirement has been deleted. Nonetheless, Cox currently provides equal access to its local telephone customers in Florida, and acknowledges that, as an ETC designated by the Florida PSC, should other ETCs in a designated area relinquish their certification, it would be within the Florida PSC's authority to require Cox to provide equal access within such designated area.

³⁵ This service and Cox's local service bundles include each of the elements required by the FCC's universal service rules other than toll limitation, which is offered separately.

³⁶ See www.cox.com for telephone offerings.

³⁷ 47 C.F.R. § 54.202(a)(5) (2011 edition).

B. Reporting

35. In the past, FCC Rule 54.209 specified reporting requirements imposed on ETCs designated by the FCC. The FPSC adopted these same requirements by Order on August 15, 2005.³⁸ They were as follows:

- 1) Progress report on its five-year service quality improvement plan
- 2) Detailed outage information
- 3) Information on unfulfilled service requests
- 4) Complaints per 1000 handsets or lines
- 5) Certification on compliance with service quality standards and consumer protection rules
- 6) Certification on ability to function in emergency situations
- 7) Certification of local usage plan
- 8) Certification on potential equal access requirement

Since the adoption of these specific requirements by the FPSC, the FCC has modified its reporting requirements for ETCs. In fact, CFR §54.209 has been eliminated in its entirety. The reporting requirements for ETCs receiving high cost support are now codified in CFR § 54.313, while requirements for Lifeline only ETCs are found in CFR § 54.422.

36. At a minimum, Cox will provide the requested information previously adopted by the FPSC as appropriate in compliance with the Commission's filing deadlines.³⁹ In addition, if the FPSC modifies its reporting requirements to specifically require some or all of the Lifeline only

³⁸ Order No. PSC-05-0824-FOF-TL, issued in Docket No. 010977-TL.

³⁹ Per the discussion, *supra* at Section V.1, Cox does not believe that a progress report on a five-year network improvement plan is applicable to a LifeLine only ETC designation

reporting requirements now contained in CFR §54.422, Cox will comply with the FPSC's revised requirements.⁴⁰

V. Serves the Public Interest

37. The final criterion under both Section 214(e) and the FCC's guidelines is whether designating a carrier as an ETC would serve the public interest. As noted in Section III, the FCC previously established its own specific public interest criteria to be applied when considering ETC applications in both rural and non-rural areas. However, in the USF/ICC Transformation Order, the FCC shifted its framework for determining support away from an analysis that distinguished between rural and non-rural carriers to instead focus on the distinctions between price capped and rate of return regulated companies.⁴¹ In doing so, the FCC nonetheless acknowledged, albeit in a footnote, that:

In particular, section 214(e)(6) specifies that the Commission "may, with respect to an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated under this paragraph Before designating an additional telecommunications carrier for an area served by a rural telephone company, the Commission shall find that the designation is in the public interest." Nothing in this Order is intended to undermine those statutory directives.

Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) at fn

202. The FPSC has also addressed the public interest review standard, and reached the conclusion that:

The public interest benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable, and affordable

⁴⁰ With regard to reporting requirements in general, Cox notes and acknowledges that FPSC Rule 25-4.0665, F.A.C., includes quarterly reporting requirements addressing service and subscriber levels, which Cox would, of course, comply with should its request for designation be approved.

⁴¹ *Supra* fn 7, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011), at Paragraph 129.

rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas.⁴² We have previously determined that before designating a carrier as an ETC, we shall make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.⁴³

Order No. PSC-10-0323-PAA-TP, issued in Docket No. 090245-TP, at p. 8. Cox's request meets the general public interest standard contemplated by the Act, as well as the more specific public interest considerations addressed in prior FPSC Orders as discussed below.⁴⁴

A. Benefits of increased competitive choice resulting from designation.

38. First, grant of this petition will serve the public interest by significantly enhancing consumer choice among low income customers in Cox's non-rural service area. Granting ETC status to Cox will allow expansion of Cox's low income service offering to customers who previously had only one choice for traditional landline telephone service.⁴⁵ In addition, because of Cox's commitment to service quality, customers could well improve the quality of the service they receive by switching to Cox.

39. Moreover, granting Cox ETC status will benefit consumers by permitting them to save money on their telephone service and obtain high quality telephone service while doing so. Cox's services are typically priced at or below the prices of comparable ILEC services even without the benefit of high cost support that ILECs may receive. Granting Cox ETC status in its

⁴² Citing, *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order FCC 05-46 (¶40), Adopted: February 25, 2005, Released: March 17, 2005.

⁴³ Citing, *In re: Petition for designation as eligible telecommunications carrier (ETC) by Easy Telephone, Inc.*, Docket No. 090337-TX, PSC-10-0125-PAA-TX, issued March 2, 2010, p.4; *In re: Application for designation as eligible telecommunications carrier (ETC) by Express Phone Service, Inc.*, Docket No. 080169-TX, PSC-08-0836-PAA-TX, issued December 24, 2008, p.4.

⁴⁴ See also, Orders Nos. PSC-08-0836-PAA-TX and PSC-10-0125-PAA-TX (stating that the FPSC makes a public interest determination whether designation is sought in the territory of a rural or a non-rural carrier.)

⁴⁵ While the availability of wireless alternatives is beneficial, there are significant differences between wireless service and landline service and many consumers do not view wireless as a substitutable service for landline. Additionally, the calling plans offered by Cox are much more similar to those offered by ILECs than those offered by wireless providers.

non-rural service area will provide consumers an additional LifeLine option to reduce their expenditures on telephone service. This combination of a lower price and high quality service is one of the specific advantages of granting ETC status to Cox. In addition, the competition from Cox may encourage competitors to lower their rates or offer promotions that are not offered today because their consumers are a captive market. These cost advantages may be particularly important to Lifeline customers.

40. If only one carrier is designated as an ETC, low income customers effectively have only one choice for local telephone service, because Lifeline makes it much less expensive to purchase service from an ETC than from any other carrier. If, however, multiple carriers are designated as ETCs, then low income customers have the same opportunity as other customers to choose a competitive alternative and to weigh the potential benefits of purchasing service from different carriers such as Cox. Moreover, in the case of Cox, that competitive alternative will be a wireline carrier.

41. At the same time, the availability of Cox's service as a competitive alternative could increase telephone penetration among potential Lifeline customers. Cox's advertising will increase the awareness of the Lifeline program and of the discounts that the program offers to make telephone service more affordable to the low income population. This increased awareness is likely to lead more low income consumers to seek to obtain telephone service, whether from Cox or another ETC, consistent with the purposes of the Lifeline program.

42. In sum, increased competitive choice will provide multiple benefits to Florida's low income consumers. These potential benefits include lower prices, improved service quality, and an additional competitive alternative for qualifying low income families. Finally, it is important to emphasize that granting this application will extend the benefits of an additional facilities-

based wireline competitive alternative to a broader base of consumers in Florida. The predominance of CETCs designated by the FPSC in Florida to date have been wireless carriers, or carriers that serve through a combination of UNEs and resale.

B. Unique advantages and disadvantages of the competitive service offering.

43. Cox is only the second wireline, predominantly facilities-based carrier to seek CETC designation in Florida. As such, Cox will continue to invest private capital in its wireline network infrastructure in its service area in Florida. Cox will continue to improve and upgrade its existing network, thereby enabling continued state-of-the-art and new telecommunications services to be available in Florida. Because of the unique hybrid-fiber-coaxial network over which Cox delivers its telephone service, the infrastructure used in the provision of telecommunications services also enables Cox to offer other advanced communications services to consumers through Cox's affiliate cable company.

44. The fact that Cox is one of the few wireline carriers seeking ETC designation should be viewed as a positive step in fulfilling the original intent and vision of the Joint Board and the FCC regarding the provision of universal service support to CETCs. The information and data provided in the *CETC Cap Order* corroborates Cox's contention that support of its provision of wireline service in Florida will give consumers the benefit of having a choice of providers of comparable, substitutable services, which is rare in many areas.

45. True competition, in Cox's view, can be achieved only when there are competitive offerings provided by facilities-based carriers, utilizing their own networks. Building competitive networks is a costly undertaking even in the most densely populated areas, but especially in more remote areas. This Petition affords the FPSC an additional opportunity to

support a true facilities-based carrier in its provision and extension of competitive choices to customers within the state of Florida.

C. Potential for creamskimming

46. A careful review and analysis of prior FCC decisions makes clear that, as a threshold matter, creamskimming concerns are only relevant when considering ETC applications in rural study areas and when high cost support is involved. Indeed, the FCC has very recently noted that “. . . As such, any creamskimming concerns that may have been raised in the context of an ETC designation for high cost support in an area of a rural telephone company are not relevant in considering the designation of a Lifeline-only ETC.”⁴⁶ Even more recently, in revisions to CFR 54.202 resulting from the FCC's recent USF/ICC Transformation and Lifeline Reform Orders, creamskimming considerations have been eliminated from the “public interest” standard of that provision. Thus, this criterion is not relevant to consideration of Cox's instant application.

D. Impact of multiple designations on the Universal Service Fund.

47. Granting ETC status to Cox also will not have any significant adverse effects on the universal service fund. As a practical matter, making Cox eligible for support from the low income programs will not increase the size of the fund meaningfully because many of the low income customers who receive service from Cox simply will be switching from one carrier to another to take advantage of lower prices or better service. Under the Lifeline program, that means that the subsidy moves from one carrier to another. The size of the fund would be increased, of course, to the extent that the addition of a new competitor causes more low income customers to purchase local telephone service. Such an increase, however, would clearly serve the goals of the low income programs and, in any event, would affect only a small portion of the

⁴⁶ See Order in WC Docket No. 09-197 released September 16, 2011 (“Cricket Order”) para. 13

overall universal service fund.⁴⁷ The potential benefits of a Cox ETC designation would far outweigh any concerns over this impact, particularly given the fact that Cox will be an additional wireline competitive alternative.

VII. Additional Considerations

48. The Commission also should consider another factor in its public interest analysis, which is that Cox and its cable affiliate are competing against bundled video, telephone and data services offered by competing carriers. To the extent these carriers can apply Lifeline discounts to these bundled offerings while Cox cannot, this gives them a competitive advantage in offering these bundled services to its customers. Granting ETC status to Cox will level that playing field and permit consumers to reap the benefits of fair competition between similarly-situated competitors.

49. Additionally, there are no public interest risks in granting ETC status to Cox. Cox is a well-established local telephone company in Florida, with a proven track record of quality service, so there is no potential harm to consumers from designating Cox as an ETC.

50. Finally, Cox is cognizant of the PSC's concerns regarding the net payer status of Florida in regard to the federal universal service fund.⁴⁸ Grant of this application will insure that additional universal service funds flow to the state to the benefit of Florida consumers.

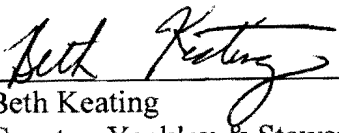
⁴⁷ Cox notes that in 2011 the low income programs accounted for less than \$2 billion of the \$8.1 billion expended by the federal universal service fund. See USAC Fast Facts, available at <http://www.usac.org/about/about/universal-service/fast-facts.aspx>.

⁴⁸ E.g., Comments to the FCC, dated April 14, 2011, in CC Docket No. 01-92, Developing an Unified Inter-carrier Compensation Regime, WC Docket No. 11-42, Connect American Fund; WC Docket No. 07-135, Establishing Just and Reasonable Rates for Local Exchange Carriers; WC Docket No. 05-337, High-Cost Universal Service Support; GN Docket No. 09-51, A National Broadband Plan for Our Future; CC Docket No. 96-45, Federal-State Joint Board on Universal Service; and WC Docket No. 03-109, Lifeline and Link-Up, stating ("Several states, including Florida, continue to shoulder a disproportionate burden of funding the program."). Cf., Reply Comments, dated August 11, 2010, stating, ("As we have stated repeatedly over the years, we oppose further growth in the size of the fund.")

VIII. Conclusion

51. Cox is currently designated as an eligible telecommunications carrier in various jurisdictions and the public interest has been served by its prior designations by other State Commissions. Cox is qualified to be designated as an eligible telecommunications carrier in Florida and the public interest will benefit if Cox is designated as a CETC throughout its non-rural service territory within the state. Consequently, Cox respectfully requests that the Commission grant this petition and designate Cox Florida Telcom, LP as an eligible telecommunications carrier in Florida for the service area described herein.

Respectfully submitted this 31st day of May, 2012,

By: 
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

Attorneys for Cox Florida Telcom, L.P.

Attachment A

**Cox Florida Telecom, LP
COX STATE ETC DESIGNATIONS**

**ATTACHMENT A
COX STATE ETC DESIGNATIONS**

State	Date of Application	Date of Approval	Docket No.
Arizona	04/20/2011	10/14/2011	T-03471A-11-0168
Arkansas	02/11/2011	05/25/2011	11-011-U
Connecticut	05/12/2008	06/20/2008	08-05-07
Georgia	04/25/2008	12/18/2008	9039
	12/28/2009	06/02/2011	9039
Iowa	12/19/2000	01/26/2001	199 IAC 39.2(4)
Kansas	09/02/2009	05/05/2010	10-COXT.174-ETC
Louisiana	04/11/2002	08/27/2003	U-26437
		02/19/2001	U-26437
	03/05/2008	09/17/2008	U-30539
	08/05/2009	-----	U-31107
Nebraska	11/21/1997	03/10/1998	C-1693
Oklahoma *	05/12/1998	12/29/1992	PUD980000258
	03/01/2002	06/20/2002	PUD200200119
	08/14/2002	11/13/2002	PUD200200398
	08/31/2004	10/29/2004	PUD200400371
	05/30/2006	07/21/2006	PUD200600143
	02/22/2011	11/17/2011	PUD 201100031
Rhode Island	07/01/2003	08/06/2003	3533
Virginia **	11/03/2003	01/13/2004	PUC-2003-00167

* Cox Oklahoma Telcom, L.L.C.'s ETC designations are as follows: (1) 1998: Norman and Edmond; (2) 2002-2004: Order issued in 2002 designated Cox an ETC in certain SBC service areas, and Cox's ETC designation was subsequently expanded by Commission order to cover additional service areas, including rural areas; (3) 2006: Tulsa; and (4) 2011: Catoosa/Keifer.

** Cox Virginia Telcom, L.L.C. subsequently withdrew its ETC designation in 2005.

Attachment B

**Cox Florida Telcom, LP
Service Areas/Calling Areas**

Central Florida (Excerpted from FL Price List No. 1, pp. 52-53)

Where facilities are available, exchange and local service areas are defined by the following Florida exchanges:

COX CENTRAL FLORIDA SERVICE AREA:

Alachua	Brooker	Ocala
Archer	Gainesville	Silver Springs Shores
Belleview	Newberry	

COX CENTRAL FLORIDA LOCAL CALLING AREA:

Exchange	Exchanges included in Local Calling Area
Alachua (Rural)	Brooker, Fort White, Gainesville, High Springs, Lake Butler, Newberry
Archer (Non-Rural)	Astor, Belleview, Beverly Hills, Bronson, Brooker, Brooksville, Bushnell, Cedar Key, Chiefland, Citra, Clermont, Cross City, Crystal River, Dade City, Dunnellon, Eustis, Forest, Gainesville, Groveland, Hawthorne, Homosassa Springs, Howey-in-the-Hills, Inverness, Keystone Heights, Lady lake, Leesburg, McIntosh, Melrose, Micanopy, Mount Dora, Newberry, Ocala, Ocklawaha, Old Town, Orange Springs, Salt Springs, San Antonio, Silver Springs Shores, Tavares, Tranton, Trilacoochee, Umatilla, Waldo, Weekiwachee Springs, Wildwood, Williston, Yankeetown
Belleview (Rural)	Archer, Astor, Bellview, Beverly Hills, Bronson, Brooker, Brooksville, Bushnell, Cedar Key, Chiefland, Citra, Clermont, Cross City, Crystal River, Dade City, Dunnellon, Eustis, Forest, Gainesville, Groveland, Hawthorne, Homosassa Springs, Howey-in-the-Hills, Inverness, Keystone Heights, Lady Lake, Leesburg, McIntosh, Melrose, Micanopy, Mount Dora, Newberry, Ocala, Ocklawaha, Old Town, Orange Springs, Salt Springs, Silver Springs Shores, Tavares, Trenton, Trilacoochee, Umatilla, Waldo, Weekiwachee Springs, Weirsdale, Wildwood, Yankeetown
Brooker (Rural)	Alachua, Archer, Astor, Belleview, Beverly Hills, Bronson, Brooker, Brooksville, Bushnell, Cedar Key, Chiefland, Citra, Clermont, Cross City, Crystal River, Dade City, Dunnellon, Eustis, Forest, Gainesville, Groveland, Hawthorne, Homosassa Springs, Howey-in-the-Hills,

	Inverness, Keystone Heights, lady Lake, Lake Butler, Lawtey, Leesburg, McIntosh, Melrose, Micanopy, Mount Dora, Newberry, Ocala, Ocklawaha, Old Town, Orange Springs, Salt Springs, San Antonio, Silver Springs Shores, Starke, Tavares, Trenton, Trilacoochee, Umatilla, Waldo, Weekiwachee Springs, Weirsdale, Wildwood, Williston, Yankeetown
Gainesville (Non-Rural)	Alachua, Archer, Astor, Belleview, Beverly Hills, Bronson, Brooker, Brooksville, Bushnell, Cedar Key, Chiefland, Citra, Clermont, Cross City, Crystal River, Dade City, Dunnellon, Eustis, Forest, Fort White, Gainesville, Groveland, Hawthorne, High Springs, Homosassa Springs, Howey-in-the-Hills, Inverness, Keystone Heights, Lake Butler, Leesburg, McIntosh, Melrose, Micanopy, Mount Dora, Newberry, Ocala, Ocklawaha, Old Town, Orange Springs, Salt Springs, San Antonio, Silver Springs Shores, Tavares, Trenton, Trilacoochee, Umatilla, Waldo, Weekiwachee Springs, Weirsdale, Wildwood, Williston, Yankeetown
Newberry (Non-Rural)	Alachua, Archer, Astor, Belleview, Beverly Hills, Bronson, Brooker, Brooksville, Bushnell, Cedar Key, Chiefland, Citra, Clermont, Cross City, Crystal River, Dade City, Dunnellon, Eustis, Forest, Gainesville, Groveland, Hawthorne, High Springs, Homosassa Springs, Howey-in-the-Hills, Inverness, Keystone Heights, Lady lake, Leesburg, McIntosh, Melrose, Micanopy, Mount Dora, Newberry, Ocala, Ocklawaha, Old Town, Orange Springs, Salt Springs, San Antonio, Silver Springs Shores, Trenton, Trilacoochee, Umatilla, Waldo, Weekiwachee Springs, Weirsdale, Wildwood, Williston, Yankeetown
Ocala (Rural)	Archer, Astor, Belleview, Beverly Hills, Bronson, Brooker, Brooksville, Bushnell, Cedar Key, Chiefland, Citra, Clermont, Cross City, Crystal River, Dade City, Dunnellon, Eustis, Forest, Gainesville, Groveland, Hawthorne, Homosassa Springs, Howey-in-the-Hills, Inverness, Keystone Heights, Lady Lake, Leesburg, McIntosh, Ocklawaha, Old Town, Orange Springs, Salt Springs, San Antonio, Silver Springs Shores, Tavares, Trenton, Trilacoochee, Umatilla, Waldo, Weekiwachee Springs, Weirsdale, Wildwood, Williston, Yankeetown
Silver Springs Shores	Archer, Astor, Belleview, Beverly Hills, Bronson, Brooker, Brooksville, Bushnell, Cedar Key, Chiefland, Citra, Clermont, Cross City, Crystal River, Dade City, Dunnellon, Eustis, Forest, Gainesville, Groveland,

(Rural)	Hawthorne, Homosassa Springs, howey-in-the-Hills, Inverness, Keystone heights, Lady Lake, Leesburg, McIntosh, Melrose, Micanopy, Mount Dora, Newberry, Ocala, Ocklawaha, Old Town, Orange Springs, Salt Springs, San Antonio, Silver Springs Shores, Tavares, Trenton, Tilacoochee, Umatilla, Waldo, Weekiwachee Springs, Weirsdale, Wildwood, Williston, Yankeetown
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Gulf Coast (Excerpted from FL Price List No. 1, pp. 65-66)

Where facilities are available, exchange and local service areas are defined by the following exchanges:

COX GULF COAST SERVICE AREA:

Cantonment	Destin	Santa Rosa Beach
Clear Springs, AL	Freeport	Shalimar
Crestview	Fort Walton Beach	Valparaiso
DeFuniak Springs	Pensacola	

COX GULF COAST LOCAL CALLING AREA:

Exchange	Exchanges included in Local Calling Area
Cantonment (including Clear Springs, AL) (Non-Rural)	Baker; Cantonment; Century; Clear Spring, AL; Crestview; De Funiak Springs; Destin, Florida, AL; Freeport; Fort Walton Beach; Glendale; Gulf Breeze; Holley-Navarre; Jay; Laurel Hill; Milton; Molino; Munson; Pace; Paxton; Pensacola; Ponce de Leon; Santa Rosa Beach; Seagrove Beach; Shalimar; Valparaiso; Walnut Hill; Wing, AL
Crestview (Rural)	Baker; Cantonment; Clear Springs, AL; Crestview; De Funiak Springs; Destin; Florida, AL; Fort Walton Beach; Freeport; Glendale; Gulf Breeze; Holley-Navarre; Jay; Laurel Hill; Milton; Molino; Munson; Pace; Paxton; Pensacola; Ponce de Leon; Santa Rosa Beach; Seagrove; Shalimar; Valparaiso; Wing, AL
Destin (Rural)	Baker; Cantonment; Clear Springs, AL; Crestview; De Funiak Springs; Destin; Florida, AL; Fort Walton Beach; Freeport; Glendale; Gulf Breeze; Holley-Navarre; Jay; Laurel Hill; Milton;

	Molino; Munson; Pace; Paxton; Pensacola; Ponce de Leon; Santa Rosa Beach; Seagrove Beach; Shalimar; Valparaiso; Wing, AL
Fort Walton Beach (Rural)	Baker; Cantonment; Clear Springs, AL; Crestview; De Funiak Springs; Destin; Florala, AL; Fort Walton Beach; Freeport; Glendale; Gulf Breeze; Holley-Navarre; Jay; Laurelhill; Milton; Molino; Munson; Pace; Paxton; Pensacola; Ponce de Leon; Santa Rosa Beach; Seagrove Beach; Shalimar; Valparaiso; Wing, AL
Freeport (Rural)	Baker; Cantonment; Clear Springs, AL; Crestview; De Funiak Springs; Destin; Florala, AL; Fort Walton Beach; Freeport; Glendale; Gulf Breeze; Holley-Navarre; Jay; Laurelhill; Milton; Molino; Munson; Pace; Paxton; Pensacola; Ponce de Leon; Santa Rosa Beach; Shalimar; Seagrove Beach; Valparaiso; Wing, AL
Pensacola (Non-Rural)	Baker; Cantonment; Century; Clear Springs, AL; Crestview; De Funiak Springs; Destin; Florala, AL; Fort Walton Beach; Freeport; Glendale; Gulf Breeze; Holley-Navarre; Jay; Laurelhill; Milton; Molino; Munson; Pace; Paxton; Pensacola; Ponce de Leon; Santa Rosa Beach; Seagrove Beach; Shalimar; Valparaiso; Walnut Hill; Wing, AL
Santa Rosa Beach (Rural)	Baker; Cantonment; Clear Springs, AL; Crestview; De Funiak Springs; Destin; Florala, AL; Fort Walton Beach; Freeport; Glendale; Gulf Breeze; Holley-Navarre; Jay; Laurelhill; Milton; Molino; Munson; Pace; Paxton; Pensacola; Ponce de Leon; Santa Rosa Beach; Seagrove Beach; Shalimar; Valparaiso; Wing, AL
Shalimar (Rural)	Baker; Cantonment; Clear Springs, AL; Crestview; De Funiak Springs; Destin; Florala, AL; Fort Walton Beach; Freeport; Glendale, Gulf Breeze; Holley-Navarre; Jay; Laurelhill; Milton; Molino; Munson; Pace; Paxton; Pensacola; Ponce de Leon; Santa Rosa Beach; Seagrove Beach; Shalimar; Valparaiso; Wing, AL
Valparaiso (Rural)	Baker; Cantonment; Clear Springs, AL; Crestview; De Funiak Springs; Destin; Florala, AL; Fort Walton Beach; Freeport; Glendale; Gulf Breeze; Holley-Navarre; Jay; Laurelhill; Milton; Molino; Munson; Pace; Paxton; Pensacola; Ponce de Leon; Santa Rosa Beach; Seagrove; Shalimar; Valparaiso; Wing, AL

**EXHIBIT
REDACTED**

**ATTACHMENT C
COX FLORIDA TELCOM, LP
NON-RURAL SERVICE AREAS IN FLORIDA**

Cox's standard service area maps are included on the following pages. In some cases, these standard maps do not identify the specific exchanges listed in Attachment A but rather those exchanges are located within the broader serving area depicted on the maps. Rural exchanges not specifically identified on these maps are located as follows.

In the Gulf Coast serving area, all rural exchanges are located in the eastern portion of Cox's service area. The DeFuniak Springs exchange is in close proximity to the Crestview exchange. The exchanges of Shalimar and Valparaiso exchanges are in the Ft. Walton beach area. Finally, the Santa Rosa Beach exchange is located in close proximity to the Freeport exchange.

In the Central Florida service area, the rural exchanges of Alachua and Brooker are located in the northern portion of the broader Gainesville service area. The Belleview and Silver Springs Shores exchanges are located in the broader Ocala service area.
