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August 18, 2016

Florida Public Service Commission
Attn: Ms. Carlotta S. Stauffer
Office of the Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

Via Overnight Mail

Re: Cox Florida Telcom, L.P.
CLEC No. TA027
2016 Annual CLEC and Wireless Lifeline Data Request

RECEIVED-PPSC
2016 AUG 19 AM 9:43
COMMISSION CLERK

Dear Ms. Stauffer:

Enclosed pursuant to Chapter 364.10 of the Florida Statutes, please find the response of Cox Florida Telcom, L.P., d/b/a "Cox," "Cox Communications ("Cox") to the Florida Public Service Commission's 2016 CLEC and Wireless Lifeline Data Request.

Pursuant to Section 364.183(1) of the Florida Statutes, Cox respectfully claims that the highlighted portions of this Report, namely information in Questions 1, 2, 4, 5, 6, and 7, contain proprietary and confidential business information, and therefore Cox files this claim of confidentiality pursuant to Rule 25-22.006(5), F.A.C. Accordingly, as required, we enclose one highlighted original copy of our response (to be held as confidential and not to be disclosed), along with two redacted copies (for public inspection). Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

Leslie McLaughlin, Regulatory Analyst
7401 Florida Boulevard, Baton Rouge, LA 70806
(225) 237-5131/ leslie.mclaughlin@cox.com
Assistant to Martin J. Corcoran,
Director Regulatory Affairs

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Enclosures

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

COX FLORIDA TELCOM, L.P.
TA-027

2016
ANNUAL CLEC and WIRELESS
LIFELINE DATA REQUEST

PUBLIC COPIES (2)

CLEC AND WIRELESS LIFELINE DATA REQUEST 2016

To assist the Public Service Commission (PSC) in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **staff requests that you provide responses to the following by August 15, 2016. Your response should include your company name, contact person, and email address.**

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

For those items requesting that the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.

1. The number of residential access lines in service each month. *

Response:

Month	# of Residential Access Lines
July 2015	
August 2015	
September 2015	
October 2015	
November 2015	
December 2015	
January 2016	
February 2016	
March 2016	
April 2016	
May 2016	
June 2016	

* These lines represent Primary Lines only.

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

Response:

Month	# of Lifeline Customers
July 2015	
August 2015	
September 2015	
October 2015	
November 2015	
December 2015	
January 2016	
February 2016	

CLEC and WIRELESS Lifeline Data Request 2016
 July 15, 2016

Month	# of Lifeline Customers
March 2016	█
April 2016	█
May 2016	█
June 2016	█

3. The amount of Lifeline credit provided to Lifeline customers on a monthly billing.

Response:

Cox Lifeline customers receive a discount that includes (1) a waiver of the \$7.00 FCC Access Charge and (2) a reduction of the standard Basic Monthly Service rate for telephone, currently from \$16.99 to \$8.99. Cox customers' total Lifeline discount is \$15.00.

4. The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).

Response:

Within this reporting period, the total number of customers denied Lifeline service was █. The various reasons were as follows: applicant was determined by NLAD to already have Lifeline service with another provider; applicant did not reside within Cox's service area; applicant was not in Cox's database; applicant's service had been disconnected or was in pending disconnection status; applicant failed to verify eligibility by either qualifying program participation or income-based qualification; applicant's name was not listed as an authorized user on the subscriber account; applicant did not submit a completed application; applicant failed to certify that household did not already have existing service with a Lifeline provider; or applicant's information did not pass NLAD verification when submitted.

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

Response:

Month	# New Lifeline Customers Added
July 2015	█
August 2015	█
September 2015	█
October 2015	█
November 2015	█
December 2015	█
January 2016	█
February 2016	█
March 2016	█

CLEC and WIRELESS Lifeline Data Request 2016
 July 15, 2016

Month	# New Lifeline Customers Added
April 2016	
May 2016	
June 2016	

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

Response:

Month	# Removed from Lifeline
July 2015	
August 2015	
September 2015	
October 2015	
November 2015	
December 2015	
January 2016	
February 2016	
March 2016	
April 2016	
May 2016	
June 2016	

* In December 2015, the higher number represents the de-enrollments required by USAC as part of the 2015 Recertification process.

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

Response:

Month	# of Lifeline Customers
July 2015	
August 2015	
September 2015	
October 2015	
November 2015	
December 2015	
January 2016	
February 2016	
March 2016	
April 2016	
May 2016	
June 2016	

8. The number of customers participating in Lifeline under the Tribal Lands provision each month.

Response: Not Applicable.

9. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

Response: Not Applicable.

10. Description of your company's procedures for enrolling customers in the Lifeline program. Include the following in your response:

- a. Procedures used to process applications received from the Office of Public Counsel.

Response:

As a local exchange service provider with less than 1 million access lines under Section 364.10, Cox's Lifeline operational team do not receive applications directly from the Office of Public Counsel, but has provided contact information to the OPC.

- b. Procedures used to process applications received directly from customers.

Response:

Cox has contracted with a nationally-based Lifeline operations administrator, Solix, which receives and processes applications on behalf of Cox. These applications are mailed or faxed by applicants to Solix's address, listed on the Cox application form. Solix reviews and processes all applications sent directly to Cox to ensure valid proof of (1) either participation in the qualifying federal/state-established benefit programs, or (2) eligibility by income, based upon household gross annual income not exceeding 150% of the current Federal Poverty Guidelines. Solix also reviews to ensure the submission of all other federally required information: SSN-4; DOB; applicant's acknowledgment and acceptance of the NLAD disclosures and consent; initialed acknowledgment of federally required Lifeline disclosure information; and applicant's verification that there is currently no other Lifeline assistance being received in the applicant's household/independent economic unit. Solix then enters each applicant into the NLAD database as required by USAC. Once the customer is cleared via NLAD, Solix provides Cox's Lifeline Operations team with the notice that the Lifeline discount code can then be placed on the applicant's account, which is processed on the day the approval is confirmed by Solix. If an application is sent directly to Cox, the Cox Lifeline Operations team will take the application review and processing steps described above.

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

Response:

The Solix team regularly accesses the FPSC secure application site to download the list of pre-qualified Lifeline applicants. Solix then reviews each applicant's

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

- d. Procedures used to process applications received through the Department of Children and Families coordinated enrollment process.

Response:

Cox receives pre-verified applicant information via the FPSC approval process.

- e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

Response:

Cox's Lifeline operations team is committed to a same-day procedure from review of the application to completion of its processing. The Lifeline discount code is applied to the account upon receipt of a valid Lifeline application as determined above, effective as of the date verified. The discounted rate appears on the next billing statement.

- 11. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the following in your response:

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

Response:

Cox utilizes USAC's annual verification procedures. The 2016 recertification is currently underway, and USAC is in the process of contacting all active Lifeline customers as of the February 2016 Data Month.

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

Response:

Same as stated in 11 (a) above. Upon completion of USAC's recertification results, Cox will either retain or immediately de-enroll a customer based on USAC's instructions to Cox pursuant to USAC's determination as to whether or not that customer remains eligible for the Lifeline benefit.

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

- a. Internal procedures for promoting Lifeline.

Response:

Customer-facing representatives receive initial training, in addition to having the resources of a permanent electronic Cox Telephone training database. Additionally, representatives receive periodic Lifeline advisories and job aids as a refresher.

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

Response:

Cox's marketing department ensures that the annual billing message informing of Lifeline program availability appears on customer bills. Additionally, Cox publishes Lifeline information on its main website associated with telephone services. Applications in either English or Spanish may be downloaded from that site.

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

Response: None currently.

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

Response: Please see Attachment 12-d.

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

Response: None currently.

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

Response:

New customer service representatives are sent to orientation and are trained on all aspects of customer service, including Lifeline. Operational procedures and guidelines on the Lifeline program are available electronically for reference by all customer-facing representatives. Cox's Product Marketing team periodically sends refresher messages to customer-facing representatives, including either an overview or general guidelines.

14. Please provide any link on your Web site that provides Lifeline information.

Response:

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

Customers must select state and city.

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

Response: Not Applicable.

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

Response: Not applicable, in that the offering of Basic Internet Access Services (BIAS), currently under consideration, will not be offered by Cox Florida Telecom, L.P., but by an unregulated Cox affiliate.

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

Response:

The only challenges foreseen in Florida would be the inability of Cox, as of December 1, to receive federal Lifeline support in connection with Lifeline applicants who may qualify by means of state eligibility criteria but who do not qualify by means of federal eligibility criteria. Due to administrative complexity and consumer confusion associated with maintaining two divergent programs, Cox would not offer Lifeline by means of state eligibility criteria. It is hoped that an alignment with federal criteria will soon be under consideration in states such as Florida where there is an existing discrepancy with federal criteria.

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

Response:

The only significant decline Cox has experienced is the anticipated annual reduction in customer numbers resulting from failure of certain customers to successfully recertify. A number of these customers eventually reapply, and Cox accordingly experiences a gradual increase over the course of the following months.

ATTACHMENT 12-d

Customer Information cont.

As a Cox customer you have the ability to block 3rd party charges on your bill, such as collect and operator assisted calls. Please call Cox Customer Care at the number on this bill statement if you would like to block 3rd party charges.



Help is Available To Reduce Your Phone Bill with Lifeline.

Cox participates in the national Lifeline assistance program. Lifeline provides local telephone service for \$8.99 per month, a monthly savings of \$15.00 which includes a waiver of the FCC Access Charge. To see if you are eligible for Lifeline assistance, please visit www.cox.com/lifeline, or contact us to request an application form be mailed to you.

Billing Dispute and Resolution: If you have any questions or disagree with any portion of your bill, please contact us at the phone number on the front of this statement no later than 60 days from the due date indicated.

TV Customers: If after contacting Cox we are unable to resolve your concern about your TV Service, you may file a complaint with your local franchising authority: Florida Dept of Agriculture, 2005 Apalachee Parkway, Tallahassee, Florida 32399-6500; 000-000-0000



[Phone](#)[Features](#)[Long
Distance](#)[Lifeline](#)

Cox Lifeline Telephone Service

When you need it, Lifeline is here to serve you with the best-quality, discounted phone service.

[About
Lifeline](#)[How to Get
Lifeline](#)[Find Out If
You Qualify](#)[How to
Apply](#)

About Lifeline

The Lifeline program offers discounted telephone service to qualifying low-income customers, provided through select local telephone companies. Benefits include:

- Monthly discounts on a phone line with unlimited local calling
- Waived service deposit for the telephone line if you elect to receive free toll blocking/restriction
- Waived End User Common Line (EUCL) fees

Lifeline provides local telephone service for \$8.99 per month, a monthly savings of \$15.00 which includes a waiver of the FCC Access Charge.

How to Get Lifeline

Fax or mail a completed Lifeline Telephone Application and provide proof of eligibility. If your application is approved and you are a current Cox customer, discounts will begin to apply to your bill

If you do not have Cox telephone service:

- Sign up for Cox telephone service in the name of the Lifeline applicant by visiting a Cox Solutions Store or order online or by phone.
- Mail or fax your approval application and documentation.

Find Out If You Qualify

Qualification for Lifeline requires that your primary residence be within the program's state and that you either have gross annual income at or below the program's established income thresholds or participate in the following public assistance programs:

- Temporary Assistance to Needy Families (TANF)
- Food Stamps / Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Supplemental Security Income (SSI)
- National School Lunch Plan (free lunch program only)
- Federal Public Housing Assistance (Section 8)
- Low-Income Home Energy Assistance Program (LIHEAP)
- Temporary Cash Assistance (TCA)

Alternatively you may qualify if your household gross annual income does not exceed the values in the following table.

Effective December 1, 2016, the eligibility criteria for the Federal Lifeline Program is changing and some of the programs listed above will be deleted. If you are applying for Lifeline service, it is highly recommended you use one of the following programs to determine eligibility in order to prevent possible future recertification denials:

- SNAP
- Medicaid
- Supplemental Security Income
- Federal Public Housing Assistance
- Listed Tribally administered programs

Household Size Per Person	Maximum Annual Income
1	\$17,820
2	\$24,030
3	\$30,240
4	\$36,450
5	\$42,660
6	\$48,870
7	\$55,095
8	\$61,335

For each additional person over 8, add: \$6,240

How to Apply

Print and complete the application form:

Lifeline Telephone Application (PDF) – in English

Lifeline Telephone Application (PDF) – in Spanish

Upon completion please mail to:

Cox Communications, Inc.
Attention: Lifeline Services
PO Box 620
Charleston, IL 61920-9905
Fax: 855-981-5433

Standard Service Activation (Line Connection) Charges Apply to Lifeline Customers. Lifeline is a government assistance program and is only available to eligible consumers. Lifeline is limited to one discount per household. Lifeline service is non-transferable.

[Ready to Shop Phone?](#)

[Browse All Packages](#)

[Build Your Bundle](#)

GETTING EVEN MORE FROM YOUR SERVICE

Regulatory Details

Easily access any Cox telecommunications service supplementary information you need.

[See Service Terms and Tariffs >](#)

International Calling

Get great calling rates to Mexico, the U.K. and beyond.

[See Plan Details >](#)

Cox Service Protection Plan

Get peace of mind with reliable protection for your home's wiring connections.

[See Plan Details >](#)