

Leslie McLaughlin, Regulatory Analyst
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Baton Rouge, LA 70806-4639
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Leslie.mclaughlin@cox.com



August 13, 2019

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
2019 Annual Lifeline Data Request (Undocketed)

REDACTED

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 2019 Annual Lifeline Data Request.

Pursuant to Section 364.183(1) of the Florida Statutes, Cox respectfully claims that the highlighted portions of this Report, namely information in Questions 1, 2, 4, 5, and 6, contain proprietary and confidential business information, and therefore Cox files this under a 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
Leslie McLaughlin, Regulatory Analyst
7401 Florida Boulevard, Baton Rouge, LA 70806
(225) 237-5131/ leslie.mclaughlin@cox.com

Enclosures

cc: Mr. Greg Fogleman, FPSC Office of Telecommunications
Ms. Sakina Deas, FPSC Office of Industry Development and Market Analysis
Ms. Chari E. Lawrence, Manager, Regulatory Affairs, Cox

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

**2019
ANNUAL LIFELINE DATA REQUEST**

PUBLIC COPIES (2)

CLEC AND WIRELESS LIFELINE DATA REQUEST 2019
COX FLORIDA TELCOM, L.P. TA-027

To assist the Florida Public Service Commission in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, staff requests that you provide responses to the following questions by August 15, 2019. 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, 2018, through June 30, 2019.

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

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

Response::

Month	# of Residential Access Lines
July 2018	
August 2018	
September 2018	
October 2018	
November 2018	
December 2018	
January 2019	
February 2019	
March 2019	
April 2019	
May 2019	
June 2019	

* These lines represent Primary Lines only.

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

Response:

Month	# of Lifeline Customers
July 2018	
August 2018	
September 2018	
October 2018	
November 2018	
December 2018	
January 2019	
February 2019	
March 2019	

Month	# of Lifeline Customers
April 2019	█
May 2019	█
June 2019	█

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

Response:

During the reporting period, Cox Lifeline customers received a discount that included a waiver of the \$6.00 FCC Access Charge along with a reduction of \$8.00 from the standard, tariffed Basic Monthly Service rate for telephone, tariffed at \$ 19.99. Cox customers' total Lifeline discount was \$14.00.

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

Response:

Within the reporting period, the total number of customers denied Lifeline service was █. In general, the various reasons for denial 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 had 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 had not submitted a completed application; applicant had 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. During this reporting period, the primary reasons were: (1) applicant had not completed the application form correctly; (2) applicant's information failed to pass NLAD verification; and (3) customer was currently receiving Lifeline.

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

Response:

Month	# of New Lifeline Customers Added
July 2018	█
August 2018	█
September 2018	█
October 2018	█
November 2018	█
December 2018	█
January 2019	█
February 2019	█
March 2019	█

Month	# of New Lifeline Customers Added
April 2019	
May 2019	
June 2019	

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

Response:

Month	# Removed from Lifeline
July 2018	
August 2018	
September 2018	
October 2018	
November 2018	
December 2018	
January 2019	
February 2019	
March 2019	
April 2019	
May 2019	
June 2019	

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

Response:

During the reporting period, Cox made available Transitional Lifeline Service, but received no request to provide the 12-month discounted rate. Although Lifeline was advertised, Transitional Lifeline service was not advertised.

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

Response:

As Cox serves no areas in Florida designated as Tribal Lands, none of its Lifeline customers are participants under such provision.

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

Response:

No change from the previous year.

10. Description of your company's procedures for Lifeline. Include the following in your response:
- a. Internal procedures for promoting Lifeline.
Response: No change from the previous year.
 - b. Outreach and educational efforts involving participation in community events.
Response: No change from the previous year.
 - c. Outreach and educational efforts involving mass media (newspaper, radio, television).
Response: No change from the previous year.
 - d. Copies of Lifeline outreach materials of your company.
Response: Cox's Marketing division conducted mailings in Florida in February 2019. A copy of the mailing is provided in **Attachment DR-9d**.
 - e. Any links on your company Web site that provides Lifeline information.
Response: Although Cox has ceased accepting new Lifeline customers and the webpage is no longer available, the link to the online Lifeline information provided by Cox during the reporting period remained unchanged from our previous year's response.
 - f. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.
Response: No change from the previous year.
11. Did your company provide Lifeline services using resale Lifeline lines obtained from an underlying carrier? If yes, identify the underlying carrier and the number of resale Lifeline lines obtained each month.
Response: No; Cox does not provide resale local exchange service.
12. To the extent you have experienced a decline in Lifeline customers since last year, please list and describe any issues that may have contributed to the decline. Any additional general comments or information you believe will assist staff in evaluating and reporting Lifeline participation in Florida are welcome.
Response: No change from the previous year.
13. Is your company currently providing Lifeline in any of the first six States that have transitioned to the National Verifier? If yes, please identify any issues you have experienced utilizing the National Verifier.
Response: Cox Florida Telcom, L.P. operates within the state of Florida only.
14. Are you using the new National Lifeline Application/Recertification forms in Florida?

Response: Yes, Cox used the new forms as of their launch.

15. In the last year, has your company filed for any form of bankruptcy? If yes, please identify the chapter and the date filed.

Response: No.

16. Within the last two years, has your company been involved in any FCC enforcement actions? If yes, please provide the FCC docket number.

Response: No.

ATTACHMENT DR-9d



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

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1. Visit cox.com and log into My Account.
2. Click the links in the "My Bill" box to enroll in:



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

IMPORTANT CUSTOMER INFORMATION

XXX, UPGRADE YOUR EXPERIENCE TODAY

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XXX
2901 NW 14th St Apt 8 000014
Gainesville FL 32605-3087



COX VOICE
\$11.99
Special price for qualified customers only

Hi XXX,

We appreciate having you as a Cox customer. If you are participating in one of several federal or state programs, or if you have a limited income, you may qualify for our special low price on Cox Voice. Our new home phone service is full of exciting features like robocall blocking, as well as Simultaneous Ring, to answer home phone calls on up to four devices. Plus, you'll get the Voice Everywhere app, so you can bring the capabilities of your home phone service everywhere via your smartphone. This unique offer also brings you:

BUDGET-FRIENDLY CONNECTION

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

HOME PHONE DEPENDABILITY

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

PEACE OF MIND WITH E911

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

It's time to experience home telephone service for as low as \$11.99 per month. Call **888-609-5573** today and see if you qualify.

Kind regards,

Colleen Levy

Colleen Levy
V.P. Field Marketing, Central

PS: **Learn more by checking out the back of this letter**, and don't forget to see if you qualify for this offer today—just \$11.99 per month.*



Great Value



Reliable Calling



Emergency Ready



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Discover new shows recommended for you and get personalized music from Pandora®.

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

Add Record & DVR
Record & shows at once and store 1,000.



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

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

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



COX VOICE

No More Robocalls
Eliminate unwanted interruptions when you sign up for Nomorobo.

Simultaneous Ring
Program up to 4 devices to ring when your home phone rings.

Voice Everywhere App
Bring the capabilities of your home phone service everywhere via your smartphone.

COX HOMELIFE™ LETS YOU CONTROL HOME FROM WHEREVER



Customized Control

Customize your home automation experience with innovative Cox Homelife technology and devices like Smart Thermostats, Smart LED Light Bulbs and Smart Door Locks.

Stay Connected

Helpful cameras allow you to check in on kids or pets with live video of your home on your mobile device.

Your Home, Your Rules

Know and control what's going on at home, even while you're away. Set rules to control multiple features—like turning the light on when you unlock your door.

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

FOR MORE INFORMATION, VISIT COX.COM/LEARN TODAY



*Cox phone service provides a high-quality voice connection to residential customers in Cox's service area. Unlimited plan long distance minutes may be used only for residential, non-commercial voice calls and usage that is not consistent with such use may subject your account to review and/or suspension or termination of your service. Calls to Mexico that terminate on a cell phone or other wireless device will incur a \$0.10 per minute charge. Telephone modems and other equipment (collectively "Customer Premise Equipment" or "CPE") may be required and will be provided for the duration of phone service subscription. Upon discontinuation of phone service, CPE must be returned within 30 days or a monthly rental fee or lost equipment charge will apply. CPE uses household electrical power to operate. Telephone service, including access to 911 service, will not be available during a power outage without battery backup or if the CPE is moved or inoperable. New CPE installs do not come with a battery. You may purchase a backup battery from Cox or, if you are a lifetime customer, obtain a battery from Cox without charge. You must monitor and replace the battery as needed (see www.cox.com/battery). Prices subject to change. Prices exclude taxes, surcharges and other fees, including without limitation the Camera Cox Recovery Fee. Installation charges and other restrictions may apply. Telephone service provided by an affiliated Cox entity and may utilize third-party services and facilities. Service and features may not be available in all areas. *Must be an active Cox Voice Premier customer to have access to Cox Voice Everywhere App functionality. Cox Voice Everywhere app only available for mobile iOS and Android devices. Nomorobo is a 3rd party vendor which provides its service to residential wireline customers who have access to Simultaneous Ring functionality. Nomorobo service provided per Nomorobo terms of service and currently at no additional monthly cost. See nomorobo.com/privacy for terms of service. Nomorobo may change its terms of service, including its fee at any time. Your current telephone modem remains Cox property. Backup battery (not included) required for service, including access to 911 service, during power outage. You must monitor and replace the battery as needed (see www.cox.com/battery). Other restrictions may apply. ©2018 Cox Communications, Inc. All rights reserved.

†Lifetime service is a government assistance program in which only eligible consumers may enroll. The service is non-transferable and is limited to one discount per household. The advertised monthly discounted Lifetime local flat rate service is available only to qualifying residential customers who provide and maintain certification of lifetime eligibility (based on criteria determined by governing regulatory authorities). FCC access charge waived. Local toll, long distance, phone features, directory or operator assisted calls, additional jacks, taxes, fees and surcharges additional. California customers: Customers using a TV or equipped telephone device may be eligible for discounts on one additional line. Lifetime Measured rate option available at different monthly charge. Georgia customers: Unresolved complaints concerning Lifetime service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at 800-282-5813.

Features noted above may require additional subscription. Record & storage capacity based on 1000 hours of SD programming; capacity varies with mix of SD and HD recordings. TV Caller ID requires Cox Advanced TV and Cox Digital Telephone Essential or Premier. Cox Homelife Service provided by Cox Advanced Services: Arizona, LLC - ALARM License No. 181410, ROC License No. 310876; Arkansas, LLC - License No. E 2014.0026/CMY0002278; California, LLC - Alarm License #7196 & Contractor's License #992992; Connecticut, LLC - License #NR; Florida, LLC - License No. 1572000-232; Georgia, LLC - License: Bryan David Molinari #10406595; Idaho, LLC - License #C214646; IL - License #C214646; IN - License #C214646; Iowa, LLC - License #C214646; LA - License #C214646; Louisiana, LLC - License #C214646; MD - License #C214646; Michigan, LLC - License #C214646; Minnesota, LLC - License #C214646; Missouri, LLC - License #C214646; Montana, LLC - License #C214646; Nebraska, LLC - License #C214646; Nevada, LLC - License #C214646; New York, LLC - License #C214646; North Carolina, LLC - License #C214646; North Dakota, LLC - License #C214646; Oklahoma, LLC - License #C214646; Rhode Island, LLC - License #C214646; South Carolina, LLC - License #C214646; South Dakota, LLC - License #C214646; Tennessee, LLC - License #C214646; Texas, LLC - License #C214646; Utah, LLC - License #C214646; Virginia, LLC - License #C214646; Washington, LLC - License #C214646; Wisconsin, LLC - License #C214646; Wyoming, LLC - License #C214646.





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

Signing up is easy:

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XXX, UPGRADE YOUR EXPERIENCE TODAY

00009ECRWSH**C-016
XXX
903 Kenny Dr
Pensacola FL 32504-8126 000219




COX VOICE
\$11.99
Special price for qualified customers only

Hi XXX,

We appreciate having you as a Cox customer. If you are participating in one of several federal or state programs, or if you have a limited income, you may qualify for our special low price on Cox Voice. Our new home phone service is full of exciting features like robocall blocking, as well as Simultaneous Ring, to answer home phone calls on up to four devices. Plus, you'll get the Voice Everywhere app, so you can bring the capabilities of your home phone service everywhere via your smartphone. This unique offer also brings you:

BUDGET-FRIENDLY CONNECTION

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

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

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



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Helpful cameras allow you to check in on kids or pets with live video of your home on your mobile device.

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