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April 17, 2017

Florida Public Service Commission  
Attn: Ms. Carlotta 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  
Response to 2017 Local Competition Report Data Request

Dear Ms. Stauffer:

Enclosed please find the voluntary response of VoIP provider Cox Florida Telcom, L.P., d/b/a "Cox," "Cox Communications", "Cox Business" ("Cox") to the Florida Public Service Commission's 2017 Local Competition Report Data Request.

Pursuant to Section 364.183(1) of the Florida Statutes, Cox respectfully claims that the highlighted portions of this Report, namely Attachment 1 (Form 477, Interconnected VoIP information), 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 have enclosed one highlighted original copy of Attachment 1 (to be held as confidential and not to be disclosed), along with two redacted copies of Attachment 1 (for public inspection).

Should you have any questions about the report or require additional information, please do not hesitate to contact me at once.

Sincerely,

Martin J. Corcoran  
Director, Regulatory Affairs, Southeast Region

cc: Anthony Pope, Senior Vice President and Region Manager

Enclosures

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# 2017 Competitive Local Exchange Carrier (CLEC) Questionnaire

(Due by April 17, 2017)<sup>1</sup>

Legal Company Name: **Cox Florida Telcom, L.P.**

D/B/A: **"Cox Communications," "Cox," and "Cox Business"**

FPSC Company Code (e.g., TX000) **TA 027**

Contact name & title: **Martin J. Corcoran, Director, Regulatory Affairs**

Telephone number: **404-269-5556**

E-mail address: **martin.corcoran@cox.com**

Stock Symbol (if company is publicly traded): **n/a**

1. Please provide a copy of the Form 477 you filed with the FCC with data as of **December 31, 2016**.

**Please See Attachment 1.**

2. Are you currently operating under Chapter 7 or Chapter 11 bankruptcy protection?

\_\_\_\_\_ Yes (Chapter 7)      \_\_\_\_\_ Yes (Chapter 11)        X   No

3. What services, other than local service, does your company currently provide in Florida? Please check all that apply.

<u>  X  </u> Private line/special access	_____ Wholesale loops
<u>  X  </u> VoIP	_____ Fiber or copper based video service
<u>  X  </u> Wholesale transport	_____ Cable television
<u>  X  </u> Interexchange service	_____ Satellite television
_____ Cellular/wireless service	_____ Broadband Internet access
_____ Other	

4. What percentage of your Florida residential and business customers purchase bundled (i.e. voice service packaged with additional services such as internet or video service) offerings? Please provide the percentage below. Do not include bundles of telecom-only services.

\_\_\_\_\_ Residential      \_\_\_\_\_ Business        X   Not applicable \*

*\* Cox recognizes that in prior years this information has been provided; however, this was done in error, as Cox Florida Telcom, L.P. is a provider telephone service only, and any other services are provided by unregulated affiliate entities.*

**PLEASE TURN OVER**

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<sup>1</sup> The due date is established by Section 364.386(1)(b), Florida Statutes. Failure to comply with this rule may result in the Commission assessing penalties of up to \$25,000 per offense, with each day of noncompliance constituting a separate offense per Section 364.285(1), Florida Statutes.

2017 Competitive Local Exchange Carrier (CLEC) Questionnaire  
(Due by April 17, 2017)

5. Does your company currently publicly publish your service and price schedules for services offered in Florida at a location other than the Florida Public Service Commission? If yes, please indicate where and include the complete address or hyperlink if on a webpage. (Chapter 364.04, F.S.)

Yes   X        If yes, where?  (link provided below\*)       No           

<https://www.cox.com/residential/pricing.html#Phone>

\* City and State will need to be entered at the top of the webpage.

### Questions About the Competitive Markets

6. Have you experienced any significant barriers in entering Florida's local exchange markets? Please describe any major barriers encountered that you believe may be impeding the growth of local competition in the state, along with any suggestions as to how to remove such obstacles. Any additional general information is welcome.

**Since launch of telephone service, Cox has not encountered any significant barriers or challenges.**

7. What types of customers do you pursue/what does your typical customer look like?

**Cox widely markets to all potential customers in its Central Florida and Gulf Coast service area. Of course, Cox's earlier offers focused on our residential customers, but since then, we have expanded to include small and medium size commercial customers, with an occasional enterprise customer.**

8. How do you compete for customers today, and how has that changed in the past five years? The past 20 years? 20?

**There are no significant changes to Cox's direct mail, television advertising, and telephone marketing initiatives, which highlight our brand, customer service and attractive pricing options.**

9. Other than Special Access/Business Data Services pricing, what are CLECs' main issues/challenges today?

**One challenge for all telephone carriers would be a tendency toward the termination of land-line service, or "cord-cutting."**

**One challenge for Cox Communications, as parent company for Cox Florida Telcom, L.P., will continue to be access and cost for pole attachments, especially in light of our growing small cell services.**

2017 Competitive Local Exchange Carrier (CLEC) Questionnaire  
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10. What decisions have the FCC and/or states made since the 1996 Federal Telecom Act that affected your company the most (good or bad)?

**The recent FCC Lifeline Reform and Modernization orders have introduced both benefits and challenges to Cox's Lifeline operations.**

11. Did your company try to interconnect via IP and/or purchase any wholesale IP services from AT&T in their IP trial central office in West Delray Beach? If so, what was your experience there?

N/A

12. What can states do/what should states be doing to ensure competition for telecom services continues to grow in their state, including "best practices" ?

**Although Cox has not recently encountered any obstacles in connection with local service freezes, this issue would always be a consideration in terms of monitoring competition.**

13. What do you think will be the major proceedings/decisions from the FCC over the next five years?

**One proceeding to consider might be the retention of CLEC interconnection rights in light of the ILECs' IP transition initiative.**

**We also anticipate upcoming work in connection with the FCC's consideration of viable technology to mitigate Caller I.D. spoofing and associated Robocall issues.**

**Please use additional paper if needed.**

**ATTACHMENT 1**

Main Menu Submission Menu Form 477 Instructions

Help (PDF) | 2017-01-06

FRN: 0001834696

Cox Communications

Operations: New York Data as of Dec 31, 2016

Submission Status

Original Submitted

Launched: 01/09/2017 07:56:12

### Interconnected VoIP Subscriptions

For each state in which you have one or more VoIP subscribers:

- allocate over-the-top VoIP subscriptions, where you provide service to end users without also supplying last-mile facilities (Business/Consumer and Business/Government subscribers);
- allocate all other VoIP subscriptions, where you provide service to end users and also supply last-mile facilities by (a) End-user Type (Business/Gov. and All/Consumer/Medical) and
- click Save Current State then go to the next state using the menu at the left or click Finished.

For more information about how to allocate your lines, click here.

Each call must contain a number, even if it's zero! Blanks will cause an error.

Save your work as you go, and when you've entered data for each state, click Finished.

#### Subscriptions by State

- Arizona
- Arkansas
- California
- Connecticut
- Florida
- Georgia
- Idaho
- Illinois
- Kansas
- Louisiana
- Massachusetts
- Nebraska
- Nevada
- Ohio
- Oklahoma
- Rhode Island
- Virginia

### Florida

All fields are required.

#### Grand Totals, by End-user Type

Total: 0	Consumer: 0	Business / Gov.
[REDACTED]	[REDACTED]	[REDACTED]

#### Over-the-top Subscriptions

Service to End Users Provided Without also Supplying Last-mile Facilities

Total: 0	Consumer: 0	Business / Gov.
0	0	0

#### All Other Subscriptions

Service to End Users Provided over Last-mile Facilities Supplied by the Provider, by End-user Type

Total: 0	Consumer: 0	Business / Gov.
[REDACTED]	[REDACTED]	[REDACTED]

#### by Services Sold

Total: 0	Voice with Internet: 0	Voice without Internet
[REDACTED]	[REDACTED]	[REDACTED]

#### by Last-mile Medium

Total: 0	FTTP: 0	Coaxial Cable: 0	Fixed Wireless & Satellite: 0	Copper: 0
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]