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Director, Regulatory Affairs 6205-B Peachtree Dunwoody Rd Atlanta, GA 30328 (404) 269-5556 martin.corcoran@cox.com



July 28, 2017

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

Re:

Cox Florida Telcom, L.P.

CLEC No. TA027

2017 Annual Lifeline Data Request (Undocketed)

Via Overnight Mail

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 2017 Annual Lifeline Data Request.

REDACTED

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.

1-VIII - 11:	
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	

Respectfully submitted.

Enclosures

CC:

Ms. Beth W. Salak, Director, Office of Telecommunications

COM _____ AFD ____ APA ____ ECO ____ ENG ____

IDM

GCL ____

COX FLORIDA TELCOM, L.P. TA-027

2017 ANNUAL LIFELINE DATA REQUEST

PUBLIC COPIES (2)

COX FLORIDA TELCOM, L.P. TA-027 RESPONSE TO FPSC LIFELINE DATA REQUEST 2017

To assist the Florida Public Service Commission (FPSC) in the development of our Annual Lifeline Report, staff requests that you provide responses to the following data request by July 31, 2017. This report is prepared for 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. Your response should include your company name, contact person, and email address.

For items 1 through 8, please provide the data for the fiscal year July 1, 2016, through June 30, 2017.

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 2016			
August 2016			
September 2016			
October 2016			
November 2016			
December 2016			
January 2017			
February 2017			
March 2017			
April 2017			
May 2017			
June 2017			

^{*} 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 2016			
August 2016			
September 2016			
October 2016			

Month	# of Lifeline Customers	
November 2016		K
December 2016		
January 2017		
February 2017		1
March 2017		
April 2017		
May 2017		
June 2017		The same

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 monthly 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.

Response:

Month	# New Lifeline Customers Added
July 2016	
August 2016	
September 2016	

Month	# New Lifeline Customers Added		
October 2016			
November 2016			
December 2016			
January 2017			
February 2017			
March 2017			
April 2017			
May 2017			
June 2017			

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 2016			
August 2016			
September 2016			
October 2016			
November 2016			
December 2016			
January 2017			
February 2017			
March 2017			
April 2017			
May 2017			
June 2017			

^{*} For the month of December 2016, the higher number represents the de-enrollments required by USAC as part of the 2016 annual Recertification process.

The number of customers participating in Transitional Lifeline each month.

Response:

Month	# of Lifeline Customers		
July 2016			
August 2016			
September 2016			
October 2016			
November 2016			

Month	# of Lifeline Customers		
December 2016			
January 2017			
February 2017			
March 2017			
April 2017			
May 2017			
June 2017			

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

Response: Not Applicable.

- 9. 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 does 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's Lifeline operational team receives and processes applications which are mailed or faxed by applicants to the team's address, listed on the Cox application form. Cox's team reviews and processes all applications sent directly to Cox to ensure valid proof of (1) either participation in the qualifying federally established benefit programs, or (2) eligibility by income, based upon federal poverty guidelines. Additionally, applications are reviewed to ensure the submission of all other SSN-4; DOB; applicant's acknowledgment and federally required information: 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. Each applicant is then entered into the NLAD database as required by USAC. Once the customer is cleared via NLAD, Cox's Lifeline Operations team then places the Lifeline discount code on the applicant's account, which is processed on the day the approval is confirmed as eligible. Finally, Lifeline codes are accessible only by the Lifeline operations team in order to prevent assignment of the Lifeline benefit to the account of any ineligible customer.

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

Response:

Cox's Lifeline operational team regularly accesses the FPSC secure application site to download the list of pre-qualified Lifeline applicants. Each applicant's information is then reviewed for eligibility and entered into the NLAD database as required by USAC as in 9(b) above, to verify eligibility. Once the customer is cleared via NLAD, the Lifeline discount code is applied to the customer accounts as in 9(b) above. For each downloaded applicant list (or batch), Cox's team then uploads any applicant rejections, along with FPSC-designated reason codes, into the FPSC 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 which is determined as described above, effective as of the date it is verified. The discounted rate begins on that date and appears on the next billing statement.

10. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the method(s) used to verify customer eligibility.

Response:

Cox utilizes USAC's annual verification procedures. USAC's new rolling recertification for 2017 is currently underway, and USAC is in the process of contacting all active Lifeline customers as of the Data Month beginning July 2017. 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.

Lifeline Data Request 2016 July 18, 2017

- 11. Description of your company's procedures for Lifeline. If your response has not changed from last year's response, you may indicate this below. Please 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.

<u>Response</u>: In addition to the website materials accessed via the www.cox.com link in Response 13 below, please see the outreach letter sent during 1Q2017, in **Attachment DR-11(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: No change from the previous year.

12. 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 eligibility 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. Although there is no specific scripting, the Lifeline operations team members are also available to representatives to provide any additional information needed. Further, Lifeline Operations team members routinely review Lifeline customer accounts and provide individual coaching to representatives as needed.

Lifeline Data Request 2016 July 18, 2017

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

Response: http://www.cox.com/residential/phone/lifeline.cox

Website viewers must select s5tate and city.

14. Have you experienced any problems implementing the FCC's 2016 Lifeline Modernization Order (FCC 16-38)? If yes, please elaborate.

Response:

There are no known implementation problems arising from the Order.

15. Does your company offer and seek reimbursement for Basic Internet Access Services in Florida as part of the Lifeline Program? If no, please provide the FCC forbearance order that waives this requirement for your company.

Response:

Not at this time. In the case that this should be offered in the future, the service will not be offered by Cox Florida Telcom, L.P., which provides telephone service only, but by an unregulated Cox affiliate.

The Lifeline Modernization Order (Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 at 4075, paras. 300, 301, 303), granted BIAS forbearance relief to existing Lifeline-only ETCs contingent upon an ETC's notification to the FCC that it was availing itself of the forbearance relief granted. In November 2016 Cox provided such notification to the FCC as required, along with a supplemental filing in December 2016, both of which are appended hereto as **Attachment DR-15**.

16. 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 primary decline Cox experiences is the annual reduction in customer numbers resulting from failure of certain customers to successfully recertify their Lifeline eligibility with USAC. A number of these customers eventually reapply, and Cox accordingly experiences a gradual increase over the course of the following months. Additionally, a small but steady number of customers transfer their Lifeline benefit via the NLAD system from Cox to another Lifeline provider.



cox.com/lifeline

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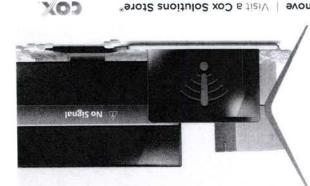
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ATTACHMENT DR-15



Joiava Philpott VICE PRESIDENT

Cox Communications – Regulatory Affairs 6205-B Peachtree Dunwoody Rd. Atlanta, GA 30328 404.269.0983 tel joiava.philpott@cox.com

November 17, 2016

Marlene H. Dortch Secretary, Office of the Secretary Federal Communications Commission 445 12th St SW Washington, D.C. 20554

Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Cox Communications, Inc. ("Cox") submits this notice to the Federal Communications Commission ("FCC") on behalf of its wholly owned subsidiaries listed in Attachment A ("Telcom Entities"). Cox obtained eligible telecommunications carrier designations in the names of its Telcom Entities in 14 states and has been providing Lifeline voice services in those states for several years. Cox's Telcom Entities, however, do not provide broadband Internet access services ("BIAS") in any state and have no plans to provide Lifeline-discounted BIAS offerings in any of the census blocks in which they provide Lifeline voice service. Accordingly, Cox, on behalf of its Telcom Entities, must avail itself of the blanket forbearance relief granted in the Lifeline Broadband Order.¹

Cox provides BIAS offerings through other wholly owned subsidiaries and intends to seek Lifeline Broadband Provider designations from the FCC on behalf of these entities to provide Lifeline-discounted BIAS offerings.

Respectfully submitted,

By:

Joiava Philpott

Nice President, Regulatory Affairs

Cox Communications, Inc.

6205 Peachtree Dunwoody Road

Atlanta, GA 30328

See Lifeline and Link-Up Reform and Modernization. Third Report and Order. Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 at 4075, paras. 301, 313 (2016). See also, Wireline Competition Bureau Announces Effective Dates Following Approval by the Office of Management and Budget of Lifeline Rules in the Lifeline Modernization Order, Public Notice, DA 16-1133 (rel. Oct. 3, 2016).

Attachment A Cox Telcom Entities

Cox Arizona Telcom, LLC

Cox Arkansas Telcom, LLC

Cox California Telcom, LLC

Cox Connecticut Telcom, LLC

Cox Florida Telcom, LP

Cox Georgia Telcom, LLC

Cox Iowa Telcom, LLC

Cox Kansas Telcom, LLC

Cox Louisiana Telcom, LLC

Cox Nebraska Telcom, LLC

Cox Nevada Telcom, LLC

Cox Oklahoma Telcom, LLC

Cox Rhode Island Telcom, LLC

Cox Virginia Telcom, LLC



Diane Law-Hsu. Senior Corporate Counsel (404) 269-4518 (404) 269-1491 Fax

December 1, 2016

Marlene H. Dortch Secretary, Office of the Secretary Federal Communications Commission 445 12th St SW Washington, D.C. 20554

Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Supplemental Notification for Forbearance from Lifeline Broadband Requirement

In accordance with the Wireline Competition Bureau's Public Notice, Cox Communications, Inc. ("Cox") submits this supplemental notification to the Federal Communications Commission ("FCC") on behalf of its wholly owned subsidiaries, which are designated as eligible telecommunications carriers ("ETCs") and provide Lifeline voice service ("Telcom Entities"). On November 17, 2016, Cox filed an initial forbearance notification stating that its Telcom Entities have no plans to provide Lifeline-discounted broadband Internet access service offerings in any of the census blocks in which they provide Lifeline voice service and availed itself of blanket forbearance relief. In this supplement, Cox provides additional information as required by the *PN* regarding its Telcom Entities' ETC designations in Attachment A. Cox also reiterates that it seeks blanket forbearance everywhere that its Telcom Entities are ETCs in all of the census blocks within its ETC service areas, including the census blocks listed in Attachment B. Cox has made every effort to comprehensively list all census blocks in which it provides service as an ETC in Attachment B.³ but if it is later discovered that any such census blocks were inadvertently omitted, Cox reserves the right to supplement this filing to make administrative corrections to Attachment B.

Respectfully submitted.

1 pr En - 1m

By:

Diane Law-Hsu
Senior Counsel Corporate Counsel
Regulatory Affairs
Cox Communications, Inc.

6205 Peachtree Dunwoody Road Atlanta, GA 30328

Wireline Competition Bureau Provides Guidance Regarding Filing Procedures for Eligible Telecommunications Carriers Seeking to Invoke Forbearance Granted by Lifeline Modernization Order, Public Notice, DA 16-1316 (Nov. 22, 2016) ("PN").

² See Wireline Competition Bureau Announces Effective Dates Following Approval by the Office of Management and Budget of Lifeline Rules in the Lifeline Modernization Order. Public Notice, DA 16-1133 (rel. Oct. 3, 2016).
³ It is possible that some of the listed census blocks are within Cox's service footprint but outside of its Telcom Affiliates' ETC designated service areas.

Attachment A

ETC	Designating authority	Type of Designation	Date of Designation	Designation Order
Cox Arizona Telcom, LLC	Arizona Corporation Commission	Lifeline Only	October 14, 2011	Decision No. 72626
Cox Arkansas Telcom, LLC	Arkansas Public Service Commission	Lifeline Only	May 25, 2011	Docket No. 11-011-U Order No. 3
Cox California Telcom, LLC	California Public Utilities Commission	Lifeline Only	October 3, 2013	Decision No. 13-10- 002
Cox Connecticut Telcom, LLC	Connecticut Department of Public Utility Control	Lifeline Only	June 19, 2008	Docket No. 08-05-07
Cox Florida Telcom, LP	Florida Public Service Commission	Lifeline Only Lifeline Only	September 12, 2012 October 17, 2012	Docket No. 120165- TP Order No. PSC-12- 0500-PAA-TP Docket No. 120175- TP Order No. PSC-12- 0552-PAA-TP
Cox Georgia Telcom, LLC	Georgia Public Service Commission	High cost. Lifeline * High Cost. Lifeline *	December 19, 2008 June 2, 2011	Docket No. 9039 Docket No. 9039
Cox Iowa Telcom, LLC	Iowa Utilities Board	High cost, Lifeline **	January 26, 2001	199 IAC 39.2 (4)

Cox Kansas Telcom, LLC	State Corporation Commission of Kansas	Lifeline Only	May 5, 2010	10-COXT-174-ETC
Cox Louisiana Telcom, LLC	Louisiana Public Service Commission	High cost, Lifeline *** High cost, Lifeline *** High cost, Lifeline *** Lifeline	August 27, 2003 February 19, 2004 September 17, 2008 July 20, 2013	Docket No. U-26437 Docket No. U-26437-A Docket No. U-30539 Docket No. S-32430
Cox Nebraska Telcom, LLC	Nebraska Public Service Commission	High cost, Lifeline **	March 10, 1998	Application No. C- 1693
Cox Nevada Telcom, LLC	Public Utilities Commission of Nevada	Lifeline Only	November 19, 2012	Docket No. 12-09007
Cox Oklahoma Telcom, LLC	Corporation Commission of Oklahoma	High cost, Lifeline ***	June 20, 2002	PUD200200119
Cox Rhode Island Telcom. LLC	Rhode Island Public Utilities Commission	Lifeline Only	August 6, 2003	Docket No. 3533
Cox Virginia Telcom, LLC	Commonwealth of Virginia State Corporation Commission	Lifeline Only	December 14, 2012	PUC-2012-00059

^{*} Cox relinquished its high cost ETC designation in Georgia effective June 30, 2016.

^{**} Cox does not and has never received high cost support in these states.

^{***} Cox receives competitive frozen high cost support only and is not required to provide Lifeline broadband services in their designated service areas. See Lifeline and Link-Up Reform and Modernization. Third Report and Order, Further Report and Order, and Order on Reconsideration. 31 FCC Red 3962 at 4075, para. 311 (2016).