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March 26, 2019

Mr. Cayce Hinton
Director
Office of Industry Development & Market Analysis
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Re: Docket No. 20190058-TX – Petition for relinquishment of eligible telecommunications carrier status, by Cox Florida Telecom, L.P. d/b/a Cox Communications d/b/a Cox Business d/b/a Cox.

Dear Mr. Hinton:

AT&T Florida respectfully submits the following response to the Staff's March 13, 2019 "ETC Data Request" regarding the Cox relinquishment petition.

The Staff's questions are premised on a misreading of the federal relinquishment statute. Under 47 USC 214(e)(4), the only time a state commission must "... require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served" is when the relinquishing carrier intends to "cease providing universal service . . ." *i.e.*, when the relinquishing carrier is shutting down operations and leaving the market. That does not appear to be the case here. The Cox relinquishment petition says that while Cox intends to stop offering the Lifeline discount once it relinquishes its ETC designation, it will continue offering its full range of services in the portions of Florida it serves. Thus, there is no need for Staff to be asking other carriers if they can provide alternative services. It appears Cox will continue offering its existing services to Florida customers, just not with a Lifeline discount.

AT&T Florida has also relinquished its ETC designation for much of its Florida service territory, except for particular census blocks for which AT&T Florida is eligible to receive CAF II funding from the FCC. See Docket No. 20170082-TP, Order No. PSC-2017-0329-CO-TP, issued August 16, 2017. As with Cox, AT&T Florida also indicated to the Commission that AT&T Florida would continue providing its existing services throughout its service territory unless and until it obtains permission to stop doing so, and that the only practical result of the AT&T Florida ETC relinquishment would be that the small number of AT&T Florida Lifeline subscribers in the relinquishment area who wished to retain their Lifeline discount would need to obtain it from another ETC. In accordance with its pledge to the Commission, since its ETC relinquishment AT&T Florida has continued to offer its existing services throughout its footprint.



In response to Staff's specific questions, AT&T Florida has not undertaken any study to determine the extent to which AT&T Florida's remaining ETC footprint overlaps with that of the Cox Florida ETC designation. Similarly, AT&T Florida has not performed any analyses of the extent to which the AT&T Florida service territory overlaps that of Cox Florida. AT&T Florida also has not performed any analyses that examine the extent to which either its service territory or its remaining ETC footprint align with particular zip codes. AT&T would note that it provides services in its footprint using its own facilities. To the extent any of Cox Florida's existing Lifeline customers (or any of its other customers for that matter) wish to obtain service from AT&T Florida and are within the AT&T Florida footprint, AT&T Florida would be able to serve those customers without constructing additional facilities.

If you have any questions concerning this matter, please call me to discuss. I can be reached at 850-577-5553.

Sincerely,

A handwritten signature in blue ink that reads "MaryRose Sirianni". The signature is written in a cursive, flowing style.

MaryRose Sirianni
External Affairs Manager
AT&T Florida