



July 28, 2020

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399

Re: 2019-20 Lifeline Report Data Request.

REDACTED

To Whom It May Concern:

On behalf of Knology of Florida, Inc. dba WOW! Internet, Cable & Phone ("WOW!"), I have enclosed its response to the Commission's Lifeline/Link up data request. Due to the proprietary nature of some of the data, WOW! is requesting confidentiality. To that end, I have enclosed an original plus a redacted version of this response. We have left the June 2020 information available on Attachment 1 & 2 on the redacted version per your request.

As always, thank you in advance for your courtesies in this matter. Should you have any questions about the enclosed material, please do not hesitate to call me.

Sincerely,

Bobby Ann McCollough
Regulatory Compliance Administrator
bobbyann.mccollough@wowinc.com
706-645-9771

Enclosures

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM 1 Attachments 3 & 4
- CLK _____








RECEIVED-FPSC
2020 JUL 30 PM 1:16
COMMISSION CLERK

CLEC AND WIRELESS LIFELINE DATA REQUEST 2020

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 by August 15, 2020. Your response should include your company name, contact person, and email address.**

Please answer the following questions as they relate to your company's Florida Lifeline customer, providing data for fiscal year July 1, 2019, through June 30, 2020.

For those items requesting the data be reported monthly, 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.

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

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

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

5. 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?

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

7. Description of your company's procedures for Lifeline. Include the following in your response:
 - a. Internal procedures for promoting Lifeline.


[REDACTED]

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

[REDACTED]

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

[REDACTED]

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

[REDACTED]

- e. Any links on your company Web site that provides Lifeline information.

[REDACTED]

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

[REDACTED]

- 8. 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.

[REDACTED]

- 9. Please identify how your company is satisfying the FCC's minimum service standards requirement.

[REDACTED]

- 10. 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.

[REDACTED]

- 11. Please identify any issues you have experienced utilizing the National Verifier.

July 28, 2020

[REDACTED]

12. Are you assisting customers with their Lifeline program applications through the National Verifier portal? If yes, please describe any issues you have experienced. If no, please describe your process for directing customers to apply with the National Verifier.

[REDACTED]

[REDACTED]

13. Are the majority of your new Lifeline customers already enrolled in the National Verifier before requesting Lifeline service from your company?

[REDACTED]

14. Since the hard launch of the National Verifier in Florida, how has your company used the customer information received from Florida's Coordinated Enrollment Process?

[REDACTED]

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

[REDACTED]

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

[REDACTED]

CLEC and WIRELESS Lifeline Data Request 2020

July 28, 2020

17. Did you observe an increase in new Lifeline customers related to COVID-19 unemployment? Additionally, please provide or describe any form of promotion your company conducted to customers newly eligible for Lifeline due to COVID-19. Any additional general comments or information on how COVID-19 has affected your Lifeline customers in Florida are welcome.



Knology of Florida, Inc. DBA WOW! Internet, Cable & Phone
2019-2020 Lifeline Data Request - Attachment 1
Confidential Filing

	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>	<u>June</u>
	<u>2019</u>	<u>2019</u>	<u>2019</u>	<u>2019</u>	<u>2019</u>	<u>2019</u>	<u>2020</u>	<u>2020</u>	<u>2020</u>	<u>2020</u>	<u>2020</u>	<u>2020</u>
1 Access Lines (Residential)												7,872
2 Lifeline Customers (excludes transition customers)												45
3 Customers Denied Lifeline												0
4 Lifeline Customers Added												0
5 Lifeline Customers Removed												1
6 Transitional Lifeline Customers												0

Lifeline Florida

ATTACHMENT 3

20219-2020

OUTREACH AND EDUCATIONAL NEWSPAPER EFFORTS

PUBLIC AWARENESS NOTIFICATION TO PATRONS RESIDING WITHIN THE SERVICE TERRITORIES OF

KNOLOGY OF CENTRAL FLORIDA, INC. d/b/a WOW!

Knology of Central Florida, Inc. is a quality telecommunications provider who provides basic and enhanced telephone services and broadband services at reasonable rates within its service territories under the business name "WOW!."

Knology of Central Florida, Inc. is designated as "Eligible Telecommunications Carrier" for its service areas for universal service purposes. The goal of universal service is to provide all citizens access to essential telecommunications services.

Knology of Central Florida, Inc. provides the supported service –voice telephony service and broadband Internet access service –throughout its designated service area. Single party residence service and single line business service at rates of \$19.99 per month for residential service and \$28.75 per month for business service. Broadband Internet access service is provided at rates which start at \$49.99 per month for residential customers and \$56.23 per month for business customers. These supported services include:

- Voice grade access to the public switched network;
- Minutes of use for local service provided at no additional charge;
- Access to emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in Knology of Central Florida, Inc.'s service area has implemented 911 or enhanced 911 systems.
- Broadband Internet access service which includes the capability to send data to and receive data from the Internet, but excludes dial-up service.

Basic voice service and other telecommunication amenities are provided to all consumers in the service areas of Knology of Central Florida, Inc. at the rates, terms and conditions specified in the companies tariffs and or price lists. Tariffs are on file with the Florida Public Service Commission and the Federal Communications Commission. Price lists are located on our website at www.wowway.com. Rates, terms and conditions for broadband services are also provided on our website. If you have questions regarding these services, contact our office at 727-239-1000 or visit our business office located at 3001 Gandy Blvd. North, Pinellas Park, Florida 33782.

Lifeline Service Offerings

As part of our service offerings, **KNOLOGY OF CENTRAL FLORIDA, INC. d/b/a WOW!** offers a program to assist qualifying low income individuals with the charges for their voice telephony service or broadband services called Lifeline. This program is part of the Federal Universal Service Fund program instituted by the Federal Communications Commission and overseen by the Universal Service Administrative Company.

The Lifeline program is limited to one discount per household. Eligible households may apply the monthly Lifeline discount to either voice service (home or wireless) or broadband service (home or wireless) but not both. Lifeline customers also have the option to apply the discount to a service bundle, such as home phone and home internet. The Lifeline voice service also includes toll blocking to qualifying customers without charge.

KNOLOGY OF CENTRAL FLORIDA, INC d/b/a WOW!'s current discount provided under the Company's Lifeline service offering is \$7.25 for home phone or \$9.25 for qualifying broadband per month for each month that the customer qualifies. To receive the discount, an individual, a dependent, or someone in the household must participate in one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program (SNAP) formerly known as Food Stamps; Supplemental Security Income; Federal Public Housing Assistance (Section 8); or Veterans and Survivors Pension Benefit. Or, the total household income must be at or below 135% of the federal poverty guidelines.

Other terms and conditions apply to the Lifeline offering. To apply for Lifeline you will need to visit the National Verifier at [CheckLifeline.org \(https://nationalverifier.servicenow.com/lifeline\)](https://nationalverifier.servicenow.com/lifeline) to check your eligibility for this federal program. If you need help, call the Lifeline Support Center at 1.877.524.1325. You may also go to

www.wowway.com under phone or Internet where it references Lifeline program to download, print, and complete the application and mail it with your proof of eligibility document to USAC, Lifeline Support Center, PO Box 7081, London, KY 40742. If you do not have access to the on-line application, please contact WOW! at 1.877.871.3411 for more information and to get an application form mailed to you to complete and send to USAC with your proof of eligibility document (s). Once you receive your one page proof of eligibility document either on-line or through the mail you will need to call 877.871.3411 to be enrolled in the program. After enrollment if you become ineligible for the Federal Lifeline discount in Florida because you no longer qualify for Medicaid, SSI, SNAP, Federal Public Housing Assistance, Veterans and Survivors benefit or your income is no longer at or below 135% of the Federal Poverty Guideline, please call 877.871.3411. You may qualify for a transitional Lifeline benefit for up to a year. Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Also, as long as a qualified individual agrees to toll blocking, that individual is not required to pay a deposit prior to our voice service being offered. Toll blocking is offered to qualifying individuals without charge.

PUBLIC AWARENESS NOTIFICATION TO PATRONS RESIDING WITHIN THE SERVICE TERRITORIES OF

KNOLOGY OF FLORIDA, LLC d/b/a WOW!

Knology of Florida, LLC is a quality telecommunications provider who provides basic and enhanced telephone services and broadband services at reasonable rates within its service territories under the business name "WOW!."

Knology of Florida, LLC is designated as "Eligible Telecommunications Carrier" for its service areas for universal service purposes. The goal of universal service is to provide all citizens access to essential telecommunications services.

Knology of Florida, LLC provides the supported service –voice telephony service and broadband Internet access service –throughout its designated service area. Single party residence service and single line business service at rates of \$19.99 per month for residential service and \$24.50 per month for business service. Broadband Internet access service is provided at rates which start at \$49.99 per month for residential customers and \$62.48 per month for business customers. These supported services include:

- Voice grade access to the public switched network;
- Minutes of use for local service provided at no additional charge;
- Access to emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in Knology of Florida, LLC's service area has implemented 911 or enhanced 911 systems.
- Broadband Internet access service which includes the capability to send data to and receive data from the Internet, but excludes dial-up service.

Basic voice service and other telecommunication amenities are provided to all consumers in the service areas of Knology of Florida, LLC at the rates, terms and conditions specified in the companies tariffs and or price lists. Tariffs are on file with the Florida Public Service Commission and the Federal Communications Commission. Price lists are located on our website at www.wowway.com. Rates, terms and conditions for broadband services are also provided on our website. If you have questions regarding these services, contact our office at 850-215-1000 or visit our business office located at 13200 Panama City Beach Parkway, Panama City Beach, Florida 32407.

Lifeline Service Offerings

As part of our service offerings, **KNOLOGY OF FLORIDA, LLC d/b/a WOW!** offers a program to assist qualifying low income individuals with the charges for their voice telephony service or broadband services called Lifeline. This program is part of the Federal Universal Service Fund program instituted by the Federal Communications Commission and overseen by the Universal Service Administrative Company.

The Lifeline program is limited to one discount per household. Eligible households may apply the monthly Lifeline discount to either voice service (home or wireless) or broadband service (home or wireless) but not both. Lifeline customers also have the option to apply the discount to a service bundle, such as home phone and home internet. The Lifeline voice service also includes toll blocking to qualifying customers without charge.

KNOLOGY OF FLORIDA, LLC d/b/a WOW!'s current discount provided under the Company's Lifeline service offering is \$7.25 for home phone or \$9.25 for qualifying broadband per month for each month that the customer qualifies. To receive the discount, an individual, a dependent, or someone in the household must participate in one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program (SNAP) formerly known as Food Stamps; Supplemental Security Income; Federal Public Housing Assistance (Section 8); or Veterans and Survivors Pension Benefit. Or, the total household income must be at or below 135% of the federal poverty guidelines.

Other terms and conditions apply to the Lifeline offering. To apply for Lifeline you will need to visit the National Verifier at CheckLifeline.org (<https://nationalverifier.servicenow.com/lifeline>) to check your eligibility for this federal program. If you need help, call the Lifeline Support Center at 1.877.524.1325. You may also go to www.wowway.com under phone or Internet where it references Lifeline program to download, print, and complete the application and mail it with your proof of eligibility document to USAC, Lifeline Support Center, PO Box 7081, London, KY 40742. If you do not have access to the on-line application, please contact WOW! at 1.877.871.3411 for more information and to get an application form mailed to you to complete and send to USAC with your proof of eligibility document (s). Once you receive your one page proof of eligibility document either on-line or through the mail you will need to call 877.871.3411 to be enrolled in the program. After enrollment if you become ineligible for the Federal Lifeline discount in Florida because you no longer qualify for Medicaid, SSI, SNAP, Federal Public Housing Assistance, Veterans and Survivors benefit or your income is no longer at or below 135% of the Federal Poverty Guideline, please call 877.871.3411. You may qualify for a transitional Lifeline benefit for up to a year. Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Also, as long as a qualified individual agrees to toll blocking, that individual is not required to pay a deposit prior to our voice service being offered. Toll blocking is offered to qualifying individuals without charge.

Lifeline Florida

ATTACHMENT 4

2019-2020

INTERNAL PROCEDURES

LIFELINE ASSISTANCE

We're here to support you.

Lifeline is a federal program intended to put home phone and internet service within the reach of qualifying families – giving low-income households affordable home phone or internet access. The Lifeline Assistance program may be able to provide a monthly local phone or broadband credit to residential customer in **applicable service areas of Alabama, Florida and Georgia.**

For details and applications, [please click here.](#)

What is Lifeline?

Lifeline is a non-transferable, federal benefit that makes monthly voice or broadband service more affordable for eligible subscribers. The program is limited to one discount per household which may be applied to either broadband service (home or wireless) or voice service (home or wireless).

Lifeline is available to residential customers who have an annual household income at or below 135% of the Federal Poverty Guidelines (see below) for a household of its size or who participate in one of the qualifying programs which include Medicaid, Supplemental Nutrition Assistance Program (SNAP or Food Stamps), Supplemental Security Income (SSI), Section 8, Federal Public Housing Assistance (FPHA) or the Veterans Pension or Survivors Benefit.

Lifeline benefits include the following:

- Federal Lifeline credit \$9.25 per month (\$7.25 for voice or \$9.25 for qualifying broadband).
- Waiver of deposit for local service¹
- Optional toll restriction at no charge¹
- Optional blocking of 900/976 numbers
- Additional lines allowed²
- Optional services available (e.g., Caller ID, Call Waiting, etc.)
- Optional blocking of pay-per-use features

Customers who do not subscribe to Toll Limitation Service when signing up for Lifeline may be required to provide a service deposit, consistent with the terms of WOW!'s General Subscriber Services Tariff.

How Do I Apply for Lifeline?

- Visit the National Verifier at checklifeline.org (<https://nationalverifier.servicenow.com/lifeline>) to check your eligibility for this federal program. If you need help, call the Lifeline Support Center at 1.877.524.1325.
- You may also download and print the application and mail it **with your proof of eligibility document** to USAC, Lifeline Support Center, PO Box 7081, London, KY 40742 or contact WOW! at 1.877.871.3411 and we will mail you a form to fill out and send to USAC **with your proof of eligibility document(s)**.

To Enroll in the Lifeline Program

- If you apply online and qualify for Lifeline you will receive a one-page proof of eligibility document. When applying by mail, you will receive the proof of eligibility through the mail.
- You will be required to provide the WOW local office with the one-page proof of eligibility document that you received from USAC when initiating service or to add the discount to your current account.

- If you applied using a benefit qualifying person (BQP – someone else in the household that qualifies for Lifeline (child/dependent) you will be required to provide the full name, DOB and last 4 numbers of their SSN.

When qualifying for Lifeline Assistance based on participation in one of the low-income assistance programs, you may be required to provide proof of participation upon request.

Annual Income 135% Thresholds Based on Household Size (2020)								
1 person	2 people	3 people	4 people	5 people	6 people	7 people	8 people	For each additional person
\$17,226	\$23,274	\$29,322	\$35,370	\$41,418	\$47,466	\$53,514	\$59,562	+ \$6,048 per person

NOTE: Federal Poverty Guidelines are updated annually; updates not reflected here are available at www.usac.org or from WOW! customer service.

Lifeline FAQs

Lifeline Application

Lifeline Application – Spanish

Lifeline Household Worksheet

Lifeline Household Worksheet - Spanish

Local Office Information

Knology of the Valley, Inc. (d/b/a WOW!)

Valley Telephone Co., LLC (d/b/a WOW!)

1570 Phillips Road

Lanett, AL 36863

Hours: 8:00 a.m. – 12:30 p.m. and 1:30 p.m. – 5:00 pm

Knology Total Communications, Inc.

2660 Montgomery Hwy

Dothan, AL 36350

Hours 8:00 a.m. – 5:00 pm.

Knology of Florida, Inc. (d/b/a WOW!)

Knology of Central Florida, Inc. (d/b/a WOW!)

13200 Panama City Beach Pkwy

Panama City, FL 32407

Hours 8:00 a.m. – 5:00 p.m.

3001 Gandy Blvd

Pinellas Park, FL 33782

Hours 8:00 a.m. 5:00 p.m.

¹ Deposit waived on new local service only. If customer has outstanding toll debt, toll restriction required.

² Lifeline plan benefits are only applicable on one phone line at the customer's principal place of residence when opting to apply the Lifeline credit to voice service.

LIFELINE FAQS

Because telecommunications service is so important in today's world, WOW! believes everyone should have access to it. We offer Lifeline service to make phone or broadband service even more affordable for qualified customers.

Lifeline Assistance is a government assistance program that provides a monthly credit for **residential customers in applicable service areas of Alabama, Florida and Georgia**. If you qualify for Lifeline Assistance, WOW! will discount your home phone \$7.25 or qualifying broadband by \$9.25 each month. Lifeline customers may subscribe to any local telephone or broadband service plans offered by WOW! WOW! offers free Toll Limitation Service to Lifeline customers for any local service plan that charges a fee for toll calls that is in addition to the monthly price of your Lifeline service.

FAQs: FCC Lifeline Rules for Phone or Broadband Service

Q. What do I need to fill in on the application?

A. It is important that you fill out the application completely and accurately to ensure there are no delays in being approved for the Lifeline program. Please review the instructions on the application carefully. Required:

- Customer Name
- Customer Account number
- Customer Service Address
- City, State, Zip
- Must note if your address is permanent or temporary
- Customer Telephone Number
- Social Security Number (last 4 digits only)
- Date of Birth (mm/dd/yyyy)
- Must check qualifying program or income; if income, must provide # of persons in household
- Must provide proof of program participation or income level
- Must check that you have read and agree to the list of certifications
- Signature
- Date

Q. Which programs qualify me for Lifeline?

A. If you feel you qualify for one of the following programs, please visit checklifeline.org (<https://nationalverifier.servicenowservices.com/lifeline>) or complete a paper application and mail in.

Supplemental Nutrition Assistance Program (SNAP)

Medicaid

Supplemental Security Income (SSI)

Federal Public Housing Assistance (FPHA)

Veterans and Survivors Pension Benefit

Tribal eligibility programs

Q. Do I have to wait until I'm approved for Lifeline to get service?

A. No.

Q. Will the Lifeline discount be on my next bill?

A. Lifeline will be applied to your account after you have provided the one- page document showing proof of your National Verification certification to the local office.

Q. What is the recertification process?

A. Subscribers whose eligibility cannot be verified via the initial automated check will be required to self-certify their eligibility for the Lifeline benefit. USAC will conduct outreach to subscribers that did not pass the automated data source check and require self-certification. Subscribers who fail the automated checks will be able to self-certify using a paper recertification form from USAC via mail to complete, Interactive Voice Response (IVR) or recertify online.

Q. What type of recertification reminders will I receive?

During the recertification time period, subscribers may receive up to three (3) robo-calls and a reminder postcard. Subscribers will receive scheduled reminders until they successfully recertify.

Q. Why isn't Lifeline showing on my bill anymore?

A. You may have failed to complete re-certification. If you have a question please contact Lifeline Support Center at 1.877.524.1325.

Q. What if I lose my eligibility due to no longer meeting government eligibility requirements?

A. If you become ineligible for the Federal Lifeline discount in Florida because you no longer qualify for Medicaid, SSI, SNAP, Federal Public Housing Assistance, Veterans and Survivors benefit or your income is no longer at or below 135% of the Federal Poverty Guidelines, please call 877-871-3411. You may qualify for a transitional Lifeline benefit for up to a year.

Q. How can I find out more about the Lifeline program?

A. Visit www.usac.org