



August 12, 2019

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

Re: 2019 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 2019 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 at (706) 645-9771.

Sincerely,

A handwritten signature in black ink that reads "Bobby Ann McCollough".

Bobby Ann McCollough
Regulatory Compliance Administrator

Enclosures

RECEIVED-FPSC
2019 AUG 19 PM 2:11
COMMISSION
CLERK

CLEC AND WIRELESS LIFELINE DATA REQUEST 2019

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, 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.

[REDACTED]

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

[REDACTED]

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

[REDACTED]

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).

[REDACTED]

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

[REDACTED]

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

[REDACTED]

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?

[REDACTED]

CLEC and WIRELESS Lifeline Data Request 2019
August 12, 2019

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

[REDACTED]

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.

[REDACTED]

10. 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]

CLEC and WIRELESS Lifeline Data Request 2019
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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.

[REDACTED]

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.

[REDACTED]

13. Is your company currently providing Lifeline in any of the states where the National Verifier has been implemented? If yes, please identify any issues you have experienced utilizing the National Verifier.

[REDACTED]

14. Are you using the National Lifeline Application/Recertification forms in Florida?

[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]

Knology of Florida, Inc. DBA WOW! Internet, Cable & Phone
2018-19 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>2018</u>	<u>2018</u>	<u>2018</u>	<u>2018</u>	<u>2018</u>	<u>2018</u>	<u>2019</u>	<u>2019</u>	<u>2019</u>	<u>2019</u>	<u>2019</u>	<u>2019</u>
1 Access Lines (Residential)												8,643
2 Lifeline Customers (excludes transition customers)												50
3 Customers Denied Lifeline												5
4 Lifeline Customers Added												2
5 Lifeline Customers Removed												1
6 Transitional Lifeline Customers												0

Knology of Florida, Inc. DBA WOW! Internet, Cable & Phone
2018-19 Lifeline Data Request - Attachment 2
Confidential Filing

Reasons for Denied Lifeline Applications

	July 2018	August 2018	September 2018	October 2018	November 2018	December 2018	January 2019	February 2019	March 2019	April 2019	May 2019	June 2019	
Not a customer	[REDACTED]												0
Not in service area	[REDACTED]												2
Business account - Doesn't qualify	[REDACTED]												0
Number does not belong to the applicant	[REDACTED]												0
Customer Disconnecting	[REDACTED]												0
Knology account not in applicant's name; applicant is not authorized user.	[REDACTED]												0
Address does not match PSC file	[REDACTED]												0
No response for recertification	[REDACTED]												0
NLAD Duplicate Subscriber and/or Duplicate Address	[REDACTED]												3
Total	[REDACTED]												5

Lifeline Florida

ATTACHMENT 3

2019

INTERNAL PROCEDURES

LIFELINE ASSISTANCE

Lifeline Assistance is a government assistance program that provides a monthly credit for **residential customers in Alabama, Florida and Georgia**. If you qualify for Lifeline Assistance, WOW! will discount your home phone or broadband charge 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.

Lifeline Program Restrictions

- Only one Lifeline service credit is available per household.
- If applying for the Lifeline credit under a Broadband service the minimum speed must be 18/2 Mbps.
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline benefits from multiple providers (i.e., if you receive a Lifeline discount on your wireless service, you would not also qualify to receive that discount on your home phone or broadband service).

Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's (or "FCC") rules and will result in the subscriber's de-enrollment from the program.

Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.

General Lifeline Information - For Phone or Broadband Service

Because telecommunications service is so important in today's world, WOW! believes everyone should have access to it. We offer a discounted service plan to make phone or broadband service even more affordable for qualified customers. Lifeline provides qualified customers with a discounted home phone service or broadband service and the ability to add additional services and features or the eligible customer can choose to apply the discount to their broadband 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. What proof do I need to bring?

A. If you qualify by program assistance, please bring in a copy of your benefits card or award letter. If you qualify by income, please bring in copies of any of the following qualifying documents — **Note: The FCC's rules require WOW! to keep a copy of any of the supporting documentation you provide in support of your eligibility to receive lifeline benefits.**

- Most recent state or federal tax return
- Retirement/pension statement of benefits
- Current income statement from an employer
- Unemployment/Workmen's Compensation Statement of Benefits
- Paycheck stubs for most recent 3 months
- Federal notice letter of participation in General Assistance
- Social Security Statement of Benefits
- Veterans Administration Statement of Benefits
- Child Support document
- Divorce decree
- Other official document containing income information

Q. How do I get proof of Social Security (Social Security Statement of Benefits) if qualifying by income?

A. Social Security Statement of Benefits is mailed to all recipients annually. If you need a copy, please contact your local Social Security office.

Q. Can I send a copy of my paycheck as proof?

A. We will need a copy of your paycheck stubs for three consecutive months within the previous twelve months, as proof. A copy of your paycheck is not accepted.

Q. Is Supplemental Social Security (SSI) the same as Social Security?

A. No. Supplemental Security Income (SSI) is a Federal income supplement program funded by general tax revenues (not Social Security taxes). It is designed to help aged, blind and disabled people who have little or no income.

Q. I'm a senior citizen, do I qualify?

A. Lifeline is not based on age. You must participate in one of the qualifying programs or meet the income guidelines to be eligible for Lifeline.

Q. I receive Medicare, do I qualify?

A. No. Medicare is not a qualifier for the Lifeline program.

Q. I babysit or am self-employed, what is acceptable for proof?

A. Please provide a photocopy of your most recent tax return.

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

A. No. You must have working service to be approved for Lifeline.

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

A. Lifeline will be applied to your account within 2 bill cycles and is retroactive back to your approval date.

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

A. You may have failed to complete a Re-certification within the required 30 days. You must re-apply by using the Application for Lifeline to have the discount added back to your account.

Q. Why did I receive a Re-certification form in the mail?

A. Lifeline eligible customers are required to recertify annually.

Q. How do I re-certify my eligibility?

A. USAC provides the subscriber three ways to complete their recertification:

1. Phone: Call a toll-free number and complete the prompts from an automated voice response system.
2. Online: Complete an online form using the USAC-maintained recertification website.
3. Mail: Complete, sign, and return a hard-copy recertification form via U.S. Mail.

Q. How can I find out more about these changes?

A. Visit www.usac.org

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

Florida Lifeline Assistance Program

Making telecommunications service even more affordable.

Because telecommunications service is so important in today's world, WOW! believes everyone should have access to it. We offer a discounted telephone or broadband service plan, Lifeline Florida, which makes these services even more affordable for qualified customers. Lifeline Florida provides qualified customers with discounted phone or broadband service and the ability to add additional services and features.

How do I Qualify for Lifeline Assistance?

Lifeline Assistance is a federal benefit available to residential customers who have an annual household income at or below 135% of the Federal Poverty Guidelines for a household of its size or who participate in any of the following low-income assistance programs:

- ❖ Medicaid
- ❖ Supplemental Nutrition Assistance Program (SNAP or Food Stamps)
- ❖ Supplemental Security Income (SSI)
- ❖ Section 8 Federal Public Housing Assistance (FPHA)
- ❖ Veterans Pension or Survivors Benefit

You may also be eligible for Lifeline Assistance even if you do not personally participate in one of these programs, as long as an individual who lives in your household, and for whom you are financially responsible, participates in at least one of these programs.

For purposes of the Lifeline program, a "household" is defined as any individual or group of individuals who live together at the same address and share in the household's income and expenses. A household may include related and unrelated persons.

If you want to qualify for Lifeline Assistance based on your annual household income, you must provide proof of your income through one or more of the following:

- Most recent state or federal tax return
- Retirement/pension statement of benefits
- Current income statement or paycheck stub from an employer
- Unemployment/Workmen's Compensation Statement of Benefits
- Paycheck stubs for three consecutive months within the previous twelve months.
- Federal notice letter of participation in General Assistance
- Social Security Statement of Benefits
- Veterans Administration Statement of Benefits
- Retirement/pension Statement of Benefits

- Child Support document
- Divorce decree
- Other official document containing income information for at least 3 consecutive months time

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

Annual Income 135% Thresholds Based on Household Size (2019)								
1 person	2 people	3 people	4 people	5 people	6 people	7 people	8 people	For each additional person
\$16,862	\$22,829	\$28,796	\$34,763	\$40,730	\$46,697	\$52,664	\$58,631	+ \$5,967 per person

If you want to qualify for Lifeline Assistance based on participation in one of the low-income assistance programs, you must provide proof of participation with one or more of the following:

- Current or prior year’s statement of benefits from a qualifying federal program
- A current notice letter of participation in a qualifying federal program
- Program participation documents, such as a copy of your SNAP card, Medicaid card, etc.
- Other official document evidencing the qualifying person’s participation in one of the listed federal low-income assistance programs

NOTE: The FCC’s rules require WOW! to keep a copy of any of the supporting documentation you provide in support of your eligibility to receive Lifeline benefits.

Are There Any Restrictions on Lifeline Assistance?

Lifeline Assistance is available on either broadband internet service (home or wireless) or phone service (home or wireless), but not both. The household may not receive Lifeline benefits from more than one company. Violation of this “one-per-household” rule is a violation of the rules of the Federal Communications Commission and will result in your de-enrollment from the Lifeline Assistance program and possible prosecution by the United States Government.

Lifeline Assistance is a federal benefit – willfully making false statements in order to receive government assistance can result in a fine or imprisonment or cause you to be de-enrolled or barred from the program. It is also a violation of federal law to rent, sell or give away your Lifeline service to any other individual.

You must notify WOW! within 30 days if you or the qualifying resident in your household no longer participate in the government assistance program(s) that qualify you for Lifeline Assistance; if your qualifying annual household income exceeds 135% of the Federal Poverty Guidelines; or if you no longer qualify to receive Lifeline Assistance for any other reason. If you move to a new address, you must also provide your new address to WOW! within 30 days after relocating.

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

The benefits of Lifeline Florida include the following:

- The maximum Lifeline Assistance credit available to Florida customers is a Federal credit of \$9.25 per month (voice or 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

How Do I Apply for Lifeline Assistance?

Knology of Florida, Inc. (Panama City Office)

You may apply in person for Lifeline Assistance at WOW!'s business office, located at 13200 Panama City Beach Pkwy in Panama City, Florida, between the hours of 8:00am and 4:00pm CST, Monday through Friday. You must complete the Lifeline application form and bring proof of your eligibility for Lifeline Assistance based on either your household income or participation in one of the qualifying low-income assistance programs. If you have questions about Lifeline Assistance, you may call our customer service representative at (850) 215-2161 during normal business hours.

Knology of Florida, Inc. (Pinellas Office)

You may apply in person for Lifeline Assistance at WOW!'s business office, located at 3001 Gandy Blvd. in Pinellas Park, Florida, between the hours of 8:00am and 5:00pm CST, Monday through Friday. You must complete the Lifeline application form and bring proof of your eligibility for Lifeline Assistance based on either your household income or participation in one of the qualifying low-income assistance programs. If you have questions about Lifeline Assistance, you may call our customer service representative at (727) 239-1000 during normal business hours.

Note: PDF format requires Adobe Acrobat Reader, available free.

More Lifeline information is available in our Company Tariffs located at

<http://www.wowway.com/terms-and-conditions/south>

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

² Lifeline Florida 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.

***Questions or complaints concerning Lifeline service may be directed to the Florida Department of
Agriculture Consumer Service Unit at (800) 435-7352.***

Lifeline Florida

ATTACHMENT 3

2019

OUTREACH AND EDUCATIONAL NEWSPAPER EFFORTS

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 \$9.25 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. For example, customers must apply for Lifeline, and applicants are required to provide at time of application, proof of their participation in one of the qualifying programs or proof of their total annual household income and recertify lifeline eligibility on an annual basis. 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.

A complete set of terms for the Lifeline program is available at our customer service location, 13200 Panama City Beach Parkway, Panama City Beach, Florida 32407.

We encourage you to contact us if you believe you may qualify for these programs. Please contact us at 850-215-1000, or visit us at 13200 Panama City Beach Parkway, Panama City Beach, Florida 32407. Our customer service representatives can work with you to answer any questions you may have.

**PUBLIC AWARENESS NOTIFICATION TO PATRONS RESIDING WITHIN THE SERVICE TERRITORIES OF
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- Voice grade access to the public switched network;
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- 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.

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or proof of their total annual household income and recertify lifeline eligibility on an annual basis. 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.

A complete set of terms for the Lifeline program is available at our customer service location, 3001 Gandy Blvd. North, Pinellas Park, Florida 33782.

We encourage you to contact us if you believe you may qualify for these programs. Please contact us at 727-239-1000, or visit us at 3001 Gandy Blvd. North, Pinellas Park, Florida 33782. Our customer service representatives can work with you to answer any questions you may have.