

REDACTED

2003 Competitive Local Exchange Carrier (CLEC) Data Request
(Due by July 31, 2003)

Legal company name: Cox Florida Telcom, L.P.

undocketed

D/B/A: Cox Communications

Stock Symbol (if publicly traded): subsidiary of Cox Communications, Inc. (COX)

FPSC company code (e.g., TX000): TA027

Contact name & title: Jill Broome, Vice President, Regulatory Affairs

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1. Please complete CLEC Table-1, Access Line Data (VGE basis).
See attached.
2. Please complete CLEC Table-2, Facilities-Based Access Line Counts (not VGEs).
See attached.
3. Please complete CLEC Table-3, Physical/Virtual Collocation Data.
See attached.
4. Please complete CLEC Table-4, Switch Data (VGE Basis).
See attached.
5. Please indicate the total number of lines over which you or an affiliate are providing

broadband service in Florida, indicating the type of broadband service available.

*** CONFIDENTIAL CLASSIFICATION REQUESTED ***

6. Are you offering or providing Voice over Internet Protocol (VoIP) services in Florida? If so, please list the respective exchanges, wire centers and price(s). Is the service local, long distance, or both?

No, Cox is not providing VoIP services in Florida.

7. Do you actively market your local services to Florida residential customers?

No.

- (a.) If not, please explain why.

Cox does not yet provide any switched local exchange service in Florida. Capital constraints and emphasis on growing existing telephone markets elsewhere in the country are principal considerations.

- (b.) If so, in what geographic areas? Not Applicable

- (c.) If so, what types of marketing do you use? Please check all that are applicable.

None Applicable.

☐ Newspaper

☐ Radio

☐ TV

☐ Direct Mail

☐ Telemarketing

☐ Email

☐ Website

☐ Other (please specify)

- (d.) If available, please provide marketing brochures or comparable materials. Not Applicable.

8. Please describe your long-term (5 years) business strategy, including whether you intend to change your method of provisioning (e.g., from resale/mixed to all UNEs to facilities-based).

Cox's long term business strategy is to provide multiple communications services using

the broadband network of its cable affiliates, including switched telephony. Cox Florida Telcom L.P.'s principal method of provision will be facilities-based, with occasional use of UNEs and resale to reach customers not on the Cox network.

9. During the last 12 months have you expanded your service offerings in Florida? If so, please list the new offerings, if they are residence or business (or both), their prices and the exchanges where you have offered the services.

No, Cox has not expanded its service offerings in Florida during the past 12 months.

10. Please list your primary line of business (for example, entertainment, cable television, private line/special access service, interexchange service, local service, cellular service, paging service, electric service, municipality, etc.)

The primary line of business of Cox Florida Telcom, L.P. is business and residential local and long distance telephony, including AAV service. Cox Florida Telcom, L.P. does have affiliation with cable affiliates in Florida, whose principal business is cable television and high speed Internet access.

11. If your company provides pre-paid local telephone service, please indicate whether this is the only service you currently provide in Florida. Also, provide an estimate as to the number of access lines served which constitute pre-paid local service.

Not applicable.

12. Please provide information on any package plans offered and include:

Not applicable.

- (a.) Which services are offered (e.g., cable television, local telephone service, long distance, broadband service)
- (b.) Where such packages are being offered (exchanges or cities)
- (c.) Whether they are provided through your company itself, an affiliate, or a business partner
- (d.) Examples of plan pricing or price ranges
- (e.) Terms and conditions (for example, is subscribing to both local telephone and long distance a condition of providing service?)

13. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any major obstacles or 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.

Cox Florida Telcom, L.P. does not provide switched local exchange service in Florida today, so does not have experience with barriers to entry specific to Florida. However, in other states, aside from capital constraints generally, most barrier-to-entry issues revolve around the interactions with ILECs. The natural reluctance of ILECs to accommodate and facilitate local exchange competition is a continual challenge, as is every software and billing change ILECs make that affects the inputs and processes of Cox. Issues such as denying a customer the opportunity to switch local exchange service providers because they may have or used to have shared DSL on their line stands in the way of local exchange competition, and is exactly backwards from the way the situation should be handled.

An area that has been a major issue in other Cox states, which we anticipate also will be so in Florida, is access to wiring in multi-dwelling units. In other states where the ILEC either still owns the wire (riser cable) inside the building to the customer's premises, Cox experiences barriers that either add greatly to Cox's costs of doing business, or delay or even impede its ability to serve customers in that building. This is an issue only for a facilities-based provider, such as Cox. Cox would be interested in having the Commission address the competitive implications of its existing demarcation point rule.

14. Have you experienced any difficulties involving any agreements you may have with incumbent ILECs? If so, please describe any significant problems encountered.

Not applicable at this time. Cox does not have any interconnection agreements with ILECs in Florida.

15. Please provide any additional comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. This information may include comments on alternative methods to evaluate the level of competition in Florida (e.g., use of the E911 databases, etc.) as well as comments or information on intermodal local competition (e.g., wireless, cable telephony).

It is obvious that consumers have more options for telephone service today than they did in 1996. As a result, the role of the Florida Public Service Commission must change from one of protecting consumers directly to protecting consumers' options by insuring that competition flourishes. The recent Florida legislation will assist the Commission in these efforts with the expedited treatment of inter-carrier disputes.

To evaluate the level of competition, the Commission should consider how many options any customer has, as well as the number of facilities-based competitors. The Commission need not look at "cable telephony" separately, since affiliates of cable providers would be certificated as ALECs, and would report their business plans as facilities-based. At this point, it does not appear that the use of 911 records would show differences between facilities-based providers and resale, and may not show residential versus business differences. Wireless replacement of wireline may bear monitoring, but probably the best way of doing so would be via a customer survey. Monitoring the yellow pages of telephone companies in a locality (how much does it change over time?) would also be a reasonable approach, in addition to other data such as NANPA NXX assignments. With thousand block pooling, this information is more reliable than previously, and the Florida Commission may be able to gain access to utilization information if it is consolidated to mask individual company competitive information.

16. For the year ending December 31, 2002, please identify your total revenue from local service, broken out by business and residence.

Zero.

17. As of December 31, 2002, how much money (in thousands of dollars) have you invested in your network serving Florida customers?

All investments in network in the public rights of way have been by Cox's cable affiliates.

18. Has your company filed either Chapter 7 or Chapter 11 bankruptcy in the past? Are you currently operating under Chapter 7 or Chapter 11 protection? If so, please provide relevant dates and details about the filing, including which chapter.

No.

19. If your company filed a Form 477 with the Federal Communications Commission in March 2003, please enclose a copy of the completed form with your response to this data request. (NOTE: This form only applies to CLECs with a minimum of 10,000 access lines.)

Cox does not meet the 10,000-access line threshold.

20. If your company is publicly traded, please provide a copy of your (or your parent company's) most recent annual report to stockholders, and Form 10-K.

Cox Florida Telcom, L.P. is not publicly traded. Attached is a copy of the annual report to stockholders and Form 10-K for Cox's up-the-line parent company, Cox Communications.