

ORIGINAL

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July 15, 2004

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BY HAND DELIVERY

Blanca Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED FPSC
JUL 15 AM 11:23
COMMISSION
CLERK

Re: Responses of Cox Florida Telcom, L.P. to 2004 Local
Competition Report Data Request

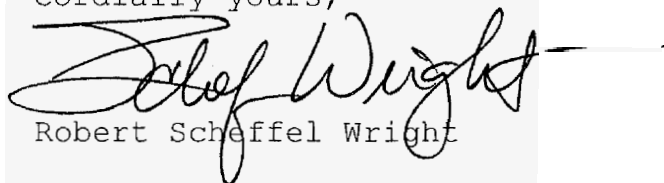
Dear Ms. Bayo:

Enclosed for filing is one copy of Cox Florida Telcom's
responses to the Commission Staff's 2004 Local Competition Report
Data Request, including hard copies of the responses as well as a
diskette containing electronic copies in WORD and Excel,
respectively.

I will appreciate your confirming receipt of this filing by
stamping the attached copy of this cover letter and returning same
to my attention.

As always, my thanks to you and to your professional Staff for
their kind and courteous assistance. If you have any questions,
please give me a call at (850) 681-0311.

Cordially yours,


Robert Scheffel Wright

CMP _____

COM _____

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OPC _____ Enclosures

MMS _____

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DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

ORIGINAL

2004 Competitive Local Exchange Carrier (CLEC) Data Request
(Due by July 15, 2004)

Legal Company Name: Cox Florida Telcom, L.P.

D/B/A: Cox Communications, Cox Business Services

FPSC Company Code (e.g.,TX000): TA027

Contact Name & Title: Jill Broome, Vice President, Regulatory Affairs

Telephone Number: 757-369-4524

E-mail Address: jill.broome@cox.com

Stock Symbol (if company is publicly traded): Cox Florida Telcom, L.P. ("Cox Telcom") is not a publicly traded company. Cox parent company, Cox Communications, Inc. is publicly traded; its symbol is COX.

1. If you are providing local service in Florida please complete the attached Tables 1-3.

N/A

2. Please indicate which of the following services your company provides. Select all that apply.

<input type="checkbox"/> Local telephone service	<input type="checkbox"/> Paging service
<input checked="" type="checkbox"/> Private line/special access	<input type="checkbox"/> Prepaid service
<input type="checkbox"/> Wholesale loops	<input type="checkbox"/> VoIP
<input checked="" type="checkbox"/> Wholesale transport	<input type="checkbox"/> Cable television
<input type="checkbox"/> Interexchange service	<input type="checkbox"/> Satellite Television
<input type="checkbox"/> Cellular service	<input type="checkbox"/> Broadband Internet Access

3. If your company provides **pre-paid** local telephone service, is this is the only service you currently provide in Florida?

N/A

4. Please complete the table on the following page showing the different bundles that you offer by marking the services you offer along with the price and take rate (the percentage of customers that subscribe to the corresponding package) for residential and business customers.

N/A

		Local	Long Distance	Broadband	Wireless	Video Service	Price	Take Rate
Residential Packages	Example	X	X			X	\$69.99	35%
Business Packages	Example	X	X	X			\$89.99	25%
	Package 1							
	Package 2							
	Package 3							
	Package 4							
	Package 5							
	Package 6							
	Package 7							
	Package 8							
	Package 9							
	Package 10							
	Package 11							
	Package 12							
	Package 13							
	Package 14							
	Package 15							

- (a.) Please indicate below what vertical services are available in the bundles you offer.

3-way calling	_____
Caller ID w/ name	_____
Call Hunt	_____
Call Waiting	_____
Voice Mail	_____
Call Transfer	_____
Caller ID Block	_____
Repeat Dialing	_____
Call Return	_____
Call Waiting w/ Caller ID	_____
Line Guard	_____
Other (Specify)	_____

- (b.) How many of the above services are included in a bundle?

- (c.) Are these bundles offered in all areas where you provide service? If not, why not and do you intend to offer them in the future?

5. Indicate below whether you are offering or providing VoIP service to end-user customers in Florida? For purposes of this question, VoIP service is defined as IP-based voice service provided over a digital connection. VoIP calls under this definition may or may not terminate on the PSTN.

☒ Not offering VoIP service in Florida.
☐ Offering business VoIP services.
☐ Offering residential VoIP services.

If you are offering or providing residential or business VoIP service in Florida:

- (a.) List the locations in Florida where you are offering VoIP service. If you roll out service by MSA, list the MSAs; if rolled out by exchange, list the exchanges, etc.
- (b.) Provide residential price(s) for VoIP service.
- (c.) Provide small business price(s) for VoIP service.
- (d.) List all call features included with the service, e.g., call forwarding, caller ID, voice mail, etc.
- (e.) Check all that apply to your VoIP service:
- ☐ Offer wireless VoIP service.
☐ Offer wireline VoIP service.

- ___ 911 (Location information not provided automatically to PSAP).
- ___ E911 (Location information provided automatically to PSAP).
- ___ CALEA (Communications Assistance for Law Enforcement Act).
- ___ Telephone Relay Service.
- ___ Power Backup (If so, identify time duration below, e.g., 4 hours, 8 hours).
- ___ Time duration of power backup (in hours).
- ___ Directory Assistance.
- ___ Operator Services.
- ___ Equal Access to long distance providers.
- ___ Local Number Portability.
- ___ Local Calling.
- ___ Long Distance Calling.
- ___ International Calling.
- ___ Contribute to Universal Service Fund.
- ___ Require VoIP subscriber to also purchase Broadband service.
- ___ Offered as primary line service.
- ___ Offered as secondary line service only.
- ___ Interconnected with PSTN.
- ___ Peer-to-Peer only (no interconnection with PSTN).
- ___ Use of public Internet.
- ___ Use of private IP network.
- ___ Call uptime 99.999%.
- ___ Use of numbers from the North American Numbering Plan Administrator.

N/A

6. If you are not offering or providing VoIP service to end-user customers in Florida, do you anticipate doing so? If yes, identify rollout month/year.

Yes. Timeframe is not finalized at this time.

7. Broadband Internet Access.

Cox Florida Telcom, L.P. does not provide broadband Internet access. Cox Florida Telcom, L.P. is not authorized to provide this information on behalf of its affiliates.

- (a.) With this data, we are interested in reporting on an aggregate statewide rather than a per company basis.

- Provide the total number of **residential** lines and wireless channels over which you or an affiliate are providing broadband service in Florida.

- Provide the total number of **small business** lines and wireless channels over which you or an affiliate are providing broadband service in

Florida. _____

- Provide the total number of **residential and small business** lines and wireless channels over which you or an affiliate are providing broadband service in Florida.

4. _____

(b.) What types of broadband connection(s) do you provide?

- ___ xDSL
- ___ cable modem
- ___ satellite
- ___ fixed wireless
- ___ mobile wireless
- ___ Wi-Fi
- ___ Broadband over power line
- ___ Other (Specify)

(c.) How do you provision broadband services? Check all that apply.

- ___ Over own facilities
- ___ Over UNE loops
- ___ Over resold facilities (ILEC)
- ___ Over resold facilities (non-ILEC)
- ___ Over loops or channels obtained from unaffiliated entities (non- ILEC)
- ___ Through line splitting agreements

(d.) Please fill out the following table providing the downstream and upstream data transfer rates and the monthly price for each tier of broadband service you offer.

Broadband Service	Data Transfer Rate		\$ Price/month
	Downstream	Upstream	
Residential			
Business			

8. 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 maybe 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 roadblocks specific to Florida. However, in other states, aside from capital constraints generally, most issues revolve around the interactions with other LECs, particularly ILECs. The natural reluctance of ILECs to want to make it possible to have local exchange competition is a continual challenge, as is every software and billing change they make that affects the inputs and processes of Cox Telcom affiliates. 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. Cox applauds the actions of the Florida commission in this regard.

An area that has been a major issue in other Cox Telcom affiliate 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 Telcom experiences barriers that either add greatly to Cox's costs of doing business, or delay its ability to serve customers in that building, or both. This is an issue only for a facilities-based provider, such as Cox Telcom. Cox Telcom would be interested in having the Commission address the competitive implications of its existing demarcation point rule. This will be mitigated in a VoIP environment, where the riser cable will not be needed, but still exists for circuit switched competitors.

Cox Telcom also has grave concerns over the results of the FCC's recent pick and choose ruling (order not yet out at this writing). The concept of "commercial negotiations" between entities that are so unevenly matched as to market power and ubiquity is ludicrous. Cox advocated to the FCC that it should adopt a policy of enabling related sections of interconnection agreements that had been arbitrated to be adopted, which would have accomplished the FCC's goals without totally disabling CLECs in their seeking of interconnection agreements.

9. Please provide any additional general comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida.

Cox Telcom has no further comments.

10. As of December 31, 2003, how much money (in thousands of dollars) have you invested in your network serving Florida customers?

None. Cox Telcom does not own the network it uses to provide telecommunications services. It uses the network of its cable affiliates.

11. Are you currently operating under Chapter 7 or Chapter 11 protection?

No.

12. If your company filed a Form 477 with the Federal Communications Commission in March 2004, 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 Florida Telcom does not meet the 10,000 access line threshold.

13. Following the D.C. Circuit's decision, the FCC called for ILECs and CLECs to negotiate.

(a.) Are you currently in negotiations with any ILECs?

No.

(b) If so, with which carriers?

N/A

(c) Are the negotiations national or Florida-only?

N/A

(d) Have you reached agreement with one or more carriers?

No.

14. If so, please provide the name(s) of the carrier(s) and when you expect to file your agreement(s) with the Florida Commission. If you do not intend to file your agreement(s), explain why.

N/A.

SAMPLE DATA

CLEC TABLE-1: ACCESS LINES (VGE Basis)
DO NOT INCLUDE UNE-P & RESOLD LINES IN THIS TABLE

1	2	3	4	5	6	7
Exchange	Res or Bus	Method of Service	Type of Service (analog or digital)	Total VGE Lines	Owned or Leased Switch	If leased, name of company providing switching service
Apopka	Res	SP	Digital	263	Owned	
Apopka	Bus	SP	Digital	504	Owned	
Apopka	Res	UNE-L	Analog	50	Owned	
Apopka	Bus	UNE-L	Analog	105	Owned	
Apopka	Bus	UNE-L	Digital	684	Owned	
Apopka	Res	EEL	Analog	24	Owned	
Apopka	Bus	EEL	Analog	64	Owned	
Apopka	Res	EEL	Digital	245	Owned	
Apopka	Bus	EEL	Digital	427	Owned	
Orlando	Res	SP	Digital	263	Leased	Company A
Orlando	Bus	SP	Digital	504	Leased	Company A
Orlando	Res	UNE-L	Analog	50	Leased	Company A
Orlando	Bus	UNE-L	Analog	105	Leased	Company A
Orlando	Bus	UNE-L	Digital	684	Leased	Company A
Orlando	Res	EEL	Analog	24	Leased	Company A
Orlando	Bus	EEL	Analog	64	Leased	Company A
Orlando	Res	EEL	Digital	245	Leased	Company A
Orlando	Bus	EEL	Digital	427	Leased	Company A
Grand Total				4732		

FLORIDA PUBLIC SERVICE COMMISSION

2004 CLEC Data Request TABLE-2

(Data as of May 31, 2004)

Company Name:

Cox Florida Telcom, L.P.

Company Code*:

TA027

* Your CLEC Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

CLEC TABLE-2: DIGITAL ACCESS LINE COUNTS (not VGEs)

DO NOT INCLUDE UNE-P, RESOLD LINES, OR PRIVATE LINES IN THIS TABLE

1	2	3	4
Exchange	Res or Bus	Line Type	Total Lines

NOTES/INSTRUCTIONS FOR COMPLETING TABLE-2:

A. The purpose of this table is to obtain a breakdown of digital access lines (reported in Table-1) by line type and actual line counts, not VGEs. **Do not include lines or channels, such as private lines, that are not connected to a switch.**

B. Each field must be populated. All entries must be made without quotation marks.

TABLE COLUMN INSTRUCTIONS:

Column 1. List exchanges in alphabetical order.

Column 2. Enter the abbreviation Res for Residential lines or Bus for Business lines. **Each service type must be entered in separate rows.**

Column 3. Enter Line Type as ISDN-BRI, ISDN-PRI, DS1, DS3, OC1, OC3, OCn (Identify value of n), VOB (If you are providing voice over broadband service), etc. **Each type must be entered in separate rows.**

Column 4. Enter actual line count total, not VGEs, in the Total Lines column without duplication. EXAMPLE: Enter 1 for 1 DS1, 2 for 2 DS3s, etc. **Each actual line count total must be entered in separate rows.**

COX FLORIDA TELCOM, L.P. DOES NOT PROVIDE SWITCHED TELEPHONE SERVICE AT THIS TIME.

SAMPLE DATA

CLEC TABLE-2: DIGITAL ACCESS LINE COUNTS (not VGEs)

DO NOT INCLUDE UNE-P, RESOLD LINES, OR PRIVATE LINES IN THIS TABLE

1	2	3	4
Exchange	Res or Bus	Line Type	Total Lines
Apopka	Res	ISDN-BRI	2
Apopka	Bus	OC48	5
Apopka	Res	VOB	1
Apopka	Bus	VOB	4
Orlando	Bus	DS1	5
Orlando	Bus	DS3	10
Orlando	Res	VOB	3
Orlando	Bus	VOB	7

FLORIDA PUBLIC SERVICE COMMISSION

2004 CLEC Data Request TABLE-3

(Data as of May 31, 2004)

Company Name: **Cox Florida Telcom, L..P.**

Company Code*: **TA027**

* Your CLEC Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

CLEC TABLE-3: CLEC SWITCH DEPLOYMENT DATA

1	2	3
Exchange where Switch is Located	Packet or Circuit	# of Switches in Exchange
N/A	N/A	0
Grand Total		0

NOTES/INSTRUCTIONS FOR COMPLETING TABLE-3:

A. The basis for this table is to obtain information about the switches you have deployed that are serving end-user customers in Florida. Please provide the requested information even if serving switch is located outside of Florida.

TABLE COLUMN INSTRUCTIONS:

Column 1. List exchanges in alphabetical order.

Column 2. Enter Circuit or Packet to describe the type of switches located in the Exchange.

Column 3. Enter the number of Circuit or Packet switches located in the exchange. The Grand Total of switches must be equal to the total number of switches, which you own and have deployed, that are being used to provide local exchange telecommunications service in Florida.

COX FLORIDA TELCOM, L.P. DOES NOT PROVIDE SWITCHED TELEPHONE SERVICE AT THIS TIME.

SAMPLE DATA

CLEC TABLE-3: CLEC SWITCH DEPLOYMENT DATA

1	2	3
Exchange where Switch is Located	Packet or Circuit	# of Switches in Exchange
Apopka	Packet	1
Apopka	Circuit	1
Grand Total		2