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Alexandra M. Wilson
Chief Policy Counsel

September 2, 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND

Cable Services Bureau
Attn: Price Survey
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: MM Docket No. 92-266

Dear Sir or Madam:

Please find enclosed for filing the original paper copies and diskettes containing the questionnaire responses to the FCC's Annual Cable Industry Price Survey that have been completed by cable systems owned by Cox Communications, Inc. ("Cox"). The survey responses are being submitted pursuant to the Cable Service Bureau's Order (DA 98-1439), released July 21, 1998 in the above-referenced proceeding.

Cox estimates that its personnel spent more than 500 hours, or roughly 19 hours per questionnaire, to complete this year's survey forms. This expenditure of time and effort is more than double the 8 hours per questionnaire that the Commission estimated would be needed to provide the requested data. As requested by the form, Cox will submit this information to the FCC's Records Management Division.

In addition, it should be noted that the sampled systems had difficulty answering some of the questions in the survey. The following list summarizes the most significant problems the systems encountered and explains how Cox attempted to resolve the issue.

- Line A7 assumes that the sampled CUID serves no more than 2 zip codes. This was not accurate for a number of the sampled Cox systems. Cox accordingly has attached an exhibit listing additional zip codes where necessary.
- Line C1 asks the system to estimate the total number of households in its franchise and system areas. Line C2 asks for the number of households passed in those same areas. The sampled Cox systems relied on 1990 census data when responding to Line C1 and used actual system data to respond to Line C2. Because the 1990 census data is outdated, however, Line C2 is greater than Line C1 in some high growth areas. Accordingly, the survey responses from the affected systems report, erroneously, that the number of households passed is actually greater than the number of households in the

rec'd

area. Unfortunately, more accurate data for the number of area households was not available.

- Cox regards information concerning its actual customer counts for new services such as high-speed data, digital telephony and digital television to be extremely commercially sensitive. This information also is not relevant to a survey of cable rates. Cox accordingly is not providing responses to Line C9 (regarding the number of Internet access subscribers), Line C11 (regarding the number of telephony customers) and Line F1ci (regarding the number of subscribers with digital converters).
- Line F3 asks for the total amount a typical subscriber paid per month on certain dates if that subscriber received the BST, the most highly penetrated CPST, a converter and a remote. Although Cox has provided the requested information, it should be emphasized that the typical Cox subscriber does not buy a converter or a remote. Cox believes that this fact should be noted when the survey results are reported so that interested parties do not erroneously conclude that the amount for cable service paid by the typical Cox subscriber is significantly higher than it actually is.
- Line F3a asks for the number of subscribers taking the package of services described in Line F3. Cox does not track this type of information about its subscribers. The respondent systems therefore have simply included the number of subscribers purchasing CPST in this line of the survey.
- Lines J2a and J3a ask the respondent system to calculate leased access charges paid by programmers on a per-subscriber, per-hour basis. Calculating these charges on a per-subscriber basis, however, produced a number that was so low as to be meaningless (e.g., \$0.00008). Cox accordingly performed its leased access rate calculations only on a per-hour basis.
- Line K9 requests the respondent system to identify those portions of its reported rate changes that were attributable to factors not otherwise expressly accounted for in Module K. In Cox's case, Line K9 reflects two additional factors: (1) the amount of true-up (which could be either a positive or a negative number) that was reflected in the rate change, and (2) the amount of external costs incurred that were not passed through in the reported rate change (which would always be a negative number). This approach enabled Cox to accurately identify the underlying causes of its rate changes and reflect the fact (not otherwise requested by the form) that most of its systems have not taken the full amount of the rate increases allowed under the FCC's rate regulations. Cox believes that this fact also should be noted when the survey results are published.

Finally, it should be noted that four of the sampled CUIDs were not able to produce data for 1996: VA0302 York County, RI0026 Portsmouth, NE0239 Omaha, and AZ0138 Scottsdale. These CUIDs are served by systems that were acquired by Cox after 1996.

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I hope this information is useful to the staff as it evaluates the survey responses from Cox's systems.

Sincerely yours,

A handwritten signature in cursive script that reads "Alexandra M. Wilson".

Alexandra M. Wilson
Chief Policy Counsel

Cox Communications, Inc. *Revised 1/1/02*
Schedule of Zip Codes for CUID FL0160

34471 Count	4,024
34472 Count	133
34474 Count	1,992
34475 Count	895
34476 Count	92
34479 Count	4,421
34480 Count	2,501
34482 Count	2,707
34488 Count	1,683
34489 Count	2
	<hr/>
	18,450

Homes in Zip code	Addr Zip 5
COUNT 2,039	73003 2,039
COUNT 215	73008 215
COUNT 1	73011 1
COUNT 4,767	73013 4,767
COUNT 1	73014 1
COUNT 1	73016 1
COUNT 1	73018 1
COUNT 2	73020 2
COUNT 104	73034 104
COUNT 1	73064 1
COUNT 2	73069 2
COUNT 1	73097 1
COUNT 6,916	73099 6,916
COUNT 1,501	73102 1,501
COUNT 3,528	73103 3,528
COUNT 1,268	73104 1,268

Homes in Zip code	Addr Zip 5
COUNT 3,414	73105 3,414
COUNT 7,865	73106 7,865
COUNT 13,872	73107 13,872
COUNT 6,869	73108 6,869
COUNT 9,450	73109 9,450
COUNT 9	73110 9
COUNT 6,408	73111 6,408
COUNT 18,027	73112 18,027
COUNT 2	73113 2
COUNT 7,912	73114 7,912
COUNT 15	73115 15
COUNT 4,501	73116 4,501
COUNT 2,582	73117 2,582
COUNT 8,707	73118 8,707
COUNT 13,072	73119 13,072
COUNT 13,671	73120 13,671

Homes in Zip code	Addr Zip 5
COUNT 1,201	73121 1,201
COUNT 3,144	73122 3,144
COUNT 4	73124 4
COUNT 2	73125 2
COUNT 12,669	73127 12,669
COUNT 1,126	73128 1,126
COUNT 10,346	73129 10,346
COUNT 3	73130 3
COUNT 481	73131 481
COUNT 10,668	73132 10,668
COUNT 2,215	73134 2,215
COUNT 6,271	73135 6,271
COUNT 8,427	73139 8,427
COUNT 4	73141 4
COUNT 3,353	73142 3,353
COUNT 1	73146 1

Homes in Zip code	Addr Zip 5
COUNT 2,335	73149 2,335
COUNT 12,305	73159 12,305
COUNT 704	73160 704
COUNT 10,684	73162 10,684
COUNT 1	73165 1
COUNT 312	73169 312
COUNT 6,921	73170 6,921
COUNT 3	73173 3
COUNT 650	73179 650
FINAL TOTALS COUNT 230,554	230,554

* * * E N D O F R E P O R T * * *

**COX COMMUNICATIONS - SAN DIEGO
ZIP CODES BY COMMUNITY**

**San Diego
CA0335**

**Escondido
CA0085**

92101
92102
92103
92104
92105
92106
92107
92108
92110
92113
92114
92115
92116
92119
92120
92139
92154
92173
92182

92025
92026
92027
92029

FL0001

08/12/98 16:26:05 Active Customers in 1032 PAGE 1
by zip code

ZIP	Addr	City	
32501			
zip			
COUNT 4,868	4,868	City	
32503			
zip			
COUNT 11,237	11,237	City	
32504			
zip			
COUNT 9,162	9,162	City/County	
32505			
zip			
COUNT 7,880	7,880	City/County	
32506			
zip			
COUNT 10,358	10,358	County	
32507			
zip			
COUNT 10,562	10,562		
32509			
zip			
COUNT 9	9		
32514			
zip			
COUNT 11,861	11,861		
32526			
zip			
COUNT 8,465	8,465	County	
32533			
zip			
COUNT 3,302	3,302	County	
32534			
zip			
COUNT 3,641	3,641	County	
COUNT 81,345	81,345		

*** END OF REPORT ***

zip count

TWC Cable Partners, DBA Cox Communications Ft Walton
Okaloosa
FL0143
Line A7, Community Zip Codes

32547
32548
32569
32579

COXCOM, Inc., DBA Cox Communications Pensacola
Pensacola
FL0002
Line A7, Community Zip Codes

32501

32503

32504

32514

CUID #	ZIP CODES
CA0311	92629 92651 92656 92657 92677
CA1070	92618 92630 92691
CA1345	92629 92651 92656 92957 92677

FCC Price Survey 97/98

CT 0004 Meriden

Additional Zip Code 06451

FL0143

08/12/98 16:16:23 Active Customers in 8710/553 PAGE 1
by zip code

ZIP	Addr	City
32579		
zip		
COUNT 423	423	
COUNT 423	423	

*** END OF REPORT ***

zip count

08/12/98 16:15:20 Active Customers in 8710/552 PAGE 1
by zip code

ZIP	Addr	City
32547		
zip		
COUNT 1,072	1,072	
32548		
zip		
COUNT 6,879	6,879	
32569		
zip		
COUNT 3	3	
COUNT 7,954	7,954	

* * * E N D O F R E P O R T * * *

zip count

	ZIP	Addr	City
zip	32541		
COUNT	1	1	
zip	32547		
COUNT	10,535	10,535	
zip	32548		
COUNT	3,067	3,067	
zip	32569		
COUNT	2,566	2,566	
zip	32579		
COUNT	3,673	3,673	
COUNT	19,842	19,842	

* * * END OF REPORT * * *

zip count

ZIP	Addr	City
32548		
zip		
COUNT 1	1	
32569		
zip		
COUNT 1,588	1,588	
COUNT 1,589	1,589	

* * * E N D O F R E P O R T * * *

zip count

08/12/98 16:10:53 Active Customers in 8710/546 PAGE 1
by zip code

ZIP	Addr	City
32548		
zip		
COUNT 207	207	
COUNT 207	207	

*** END OF REPORT ***

zip count

MODULE A. OPERATOR INFORMATION

A1 System Name

A2 Ultimate Parent Entity Name

A3 System Address

A4 City

A5 State and Zip Code

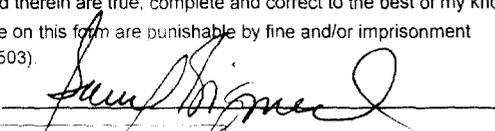
A6 Community Name

A7 Community Zip Code(s)

A8 Cuid

MODULE B. CERTIFICATION

I certify that I have examined this report, and that all statements of fact contained therein are true, complete and correct to the best of my knowledge, information and belief, and are made in good faith. Willful false statements made on this form are punishable by fine and/or imprisonment (US Code Title 18, Section 1001), and/or forfeiture (US Code, Title 47, Section 503).

B1 Signature Sign here if applicable 

B2 Printed Name / Title

B3 Date

B4 Telephone Number

B5 Fax Number

MODULE C. PENETRATION AND SYSTEM INFORMATION

	Jul 1, 1997		Jul 1, 1998	
	Franchise	System	Franchise	System
C1 Enter the number of households	369,921	369,921	369,921	369,921
C2 Enter the number of households passed	294,252	992,449	338,941	1,031,023
C3 Enter the number of subscribers	140,550	522,363	170,639	580,741
C4 Is the system part of a Multiple System Operator (MSO) of two or more systems. Please enter "1" for yes or "2" for no.				1-Yes <input type="checkbox"/>
C5 Enter system capacity in Mhz as of July 1, 1998	750			
C6 Enter the date when this system was upgraded to the capacity shown on line C5.	3/11/96			
C7 Does the system have two-way interactive capacity? Please enter "1" for yes or "2" for no.				1-Yes <input type="checkbox"/>
C8 Do you offer internet access service? Please enter "1" for yes or "2" for no.				1-Yes <input type="checkbox"/>
C9 If yes, how many internet access subscribers do you have?				
C10 Do you offer cable telephony service? Please enter "1" for yes or "2" for no.				2-No <input type="checkbox"/>
C11 If yes, how many telephony subscribers do you have?				

MODULE D. REGULATORY AND COMPETITIVE STATUS

D1 As of July 1, 1997: Please enter "1" for "Yes" or "2" for "No"

D1a Was this franchise's basic service tier (BST) regulated?

D1b Was this franchise's cable programming service tier (CPST) regulated?

D1c If BST and/or CPST are regulated, please identify the methodology that was used to set rates. Answer "1" for benchmark, "2" for cost of service, or "3" for other.

D1d Did the Commission find "effective competition" in your franchise area prior to July 1, 1997?

D2 As of July 1, 1998:

D2a Was this franchise's basic service tier (BST) regulated?

D2b Was this franchise's cable programming service tier (CPST) regulated?

D2c If BST and/or CPST are regulated, please identify the methodology that was used to set rates. Answer "1" for benchmark, "2" for cost of service, or "3" for other.

D2d Did the Commission find "effective competition" in your franchise area prior to July 1, 1998?

MODULE E: NONUNIFORM RATES

Section 623(a) of the Communications Act of 1934, as amended, exempts cable operators facing effective competition from uniform rate rules. If you are not subject to uniform rates, please complete Module "E". If you are subject to uniform rate rules, please skip to Module "F".

E1 As of July 1, 1998, were any subscribers in your franchise area subject to different price structures for BST and/or CPSTs based on geographic location (excluding bulk discounts provided to multiple dwelling units)? Answer "1" for yes or "2" for no

E2 As of July 1, 1998, enter the number of different subscriber groups in your franchise area

Please provide the information required for equipment and programming services (BST and CPST only) for the two largest subscriber groups in your franchise area.

	July 1, 1998	
	Group A	Group B
E3 Total monthly subscriber charges for programming and equipment	\$ 00	\$ 00
E4 Number of subscribers in each group		
E5 Number of channels		
E6 Please describe the basis for this grouping		
Group A:		
Group B:		

MODULE F: MONTHLY CHARGES FOR PROGRAMMING AND EQUIPMENT

Please provide the information required for equipment, programming and other services. If you are charging different rates for different subscriber groups, please answer the questions in this module for the group having the largest number of subscribers. If your equipment charges are bundled with programming charges, please enter the letter "B" on line F1 and F2.

F1 Monthly charges for equipment (break down below):	Jul 1, 1997	Jul 1, 1998
F1a Addressable Analog Converters	\$1.95	\$2.50
F1ai Number of Subscribers Taking Addressable Analog Converters	81,030	140,084
F1b Non-Addressable Converters	\$1.95	\$2.50
F1bi Number of Subscribers Taking Non-Addressable Converters	5,062	4,084
F1c Digital converters	\$ 00	\$ 00
F1ci Number of subscribers taking digital converters		
F1d Remotes	\$ 41	\$ 18
F1di Number of Subscribers Taking Remotes	73,651	121,169
F1e Additional Outlets	\$ 00	\$ 00
F1ei Number of subscribers with additional outlets	105,450	147,807
F1f Please indicate whether or not your monthly equipment rates are aggregated pursuant to section 623(a)(7)(A) of the Communications Act. Please enter "1" for yes or "2" for no.	2-No	1-Yes

F2 Monthly Charges for Programming (break down below):	Jul 1, 1997	Jul 1, 1998
F2a BST only	\$10.15	\$10.96
F2ai Number of BST subscribers	140,550	170,639
F2b CPST1 only	\$16.25	\$17.53
F2bi Number of CPST1 subscribers	133,783	161,850
F2c CPST2 only	\$ 00	\$ 00
F2ci Number of CPST2 subscribers		
F2d CPST3 only	\$ 00	\$ 00
F2di Number of CPST3 subscribers		

	July 1, 1996	Jul 1, 1997	Jul 1, 1998
F3 Total Monthly amount a typical subscriber pays for programming services and equipment (a typical subscriber is defined as one who takes BST, the most highly penetrated CPST, if offered, a converter, and a remote)	\$25.76	\$28.76	\$31.17
F3a Number of subscribers taking the services described on line F3	113,616	133,783	161,850
F3b Number of channels the subscribers taking the services described on line F3 receive	62	64	65

MODULE G: LIFE-LINE BASIC TIER INFORMATION

If you offer a tier of service that has fewer channels than the tier you designated as BST in Module D and F (this tier may be called "life-line basic" or may have some other designation), complete this module, otherwise skip Module G and go to Module H.

G Life-line basic tier:	Jul 1, 1997	Jul 1, 1998
G1 Number of life-line basic subscribers		
G2 Monthly charge for life-line basic service	\$ 00	\$ 00
G3 Number of channels devoted to each of the following categories:		
G3a Broadcast stations (Break down below):		
G3ai Local broadcast stations		
G3aii Other broadcast stations		
G3b PEG and other local origination programming (break down below):		
G3bi Public access channels		
G3bi Educational access channels		
G3bi Governmental access channels		

- 830iv Other local origination programming
- 830v Other programming channels

MODULE H: DIGITAL TIER INFORMATION

If you offer digital service, complete this module, otherwise skip Module H and go to Module I.

	Jul 1, 1997	Jul 1, 1998
H1 Digital tier:		
H1 Do you offer digital service? Please enter "1" for yes or "2" for no	↓	↓
H2 If yes, how many analog channels are devoted to digital service?		
H3 How many digital channels are in your digital tier(s)?		
H4 How many digital tiers do you offer?		
H5 Monthly charge for digital tier 1	\$.00	\$.00
H5a Number of digital tier 1 subscribers		
H5b Number of digital channels on digital tier 1		
H6 Monthly charge for digital tier 2	\$.00	\$.00
H6a Number of digital tier 2 subscribers		
H6b Number of digital channels on digital tier 2		

MODULE I: REVENUES FROM ADVERTISING AND OTHER SERVICES

	During 12 months ending July 1, 1997	During 12 months ending July 1, 1998
I1 Average charges for:		
I1a Installation	\$37.44	\$37.44
I1b Disconnect	\$.00	\$.00
I1c Reconnect	\$24.96	\$24.96
I1d Tier Change	\$1.99	\$1.99
I2 Provide number of:		
I2a Installations	55,040	66,388
I2b Disconnects	12,659	15,269
I2c Reconnects	42,381	51,119
I2d Tier changes		
I3 Advertising Revenues:		
I3a Advertising revenue from BST	\$.00	\$50,764.00
I3b Advertising revenue from CPST(s)	\$2,166,251.00	\$2,408,074.00
I3c Allocate the revenue shown on line 13b according to the following types of programming		
I3ci Sports	\$918,849.00	\$1,059,494.00
I3cii News	\$247,409.00	\$213,446.00
I3ciii Children's	\$146,121.00	\$199,146.00
I3civ All other	\$853,872.00	\$986,752.00
I4 Revenue received from other sources such as commissions, launch fees, or leased access charges (provide amount and identify source)	\$392,360.00 source: HSN / Leased Access	\$478,817.00 source: HSN / Leased Access

MODULE J: LEASED ACCESS PROGRAMMING

	Jul 1, 1998
J1 Number of leased access channels required under the FCC's leased access rules	8
J2 Number of channels with 8 hrs/day or more of leased access programming	1
J2a Average monthly charge to programmer on a per subscriber, per hour basis for carriage of 8 hrs/day or more of leased access programming	\$62.00
J3 Number of channels with less than 8 hrs/day of leased access programming	
J3a Average monthly charge to programmer on a per subscriber, per hour basis for carriage of less than 8 hrs/day of leased access programming	\$.00

MODULE K: EXPLANATION OF CHANGES IN RATES DURING 12 MONTH PERIODS ENDING JULY 1, 1997 AND 1998

If your rates changed during the 12 month periods ending July 1, 1997 and/or July 1, 1998, please provide an explanation of the changes according to the following categories. If this CUID is unregulated, please provide this information to the best of your knowledge. Please use the list of programming services (Attached) to identify the types of programming shown on lines K1a through K1d.

	Change During 12 Months Ending July 1, 1997	Change During 12 Months Ending July 1, 1998
K1 Programming license fees (allocate programming cost increases according to the following types of programming):		
K1a Sports	\$.33	\$.36
K1b News	\$.07	\$.02
K1c Children's	\$.00	\$.03
K1d All other	\$.34	\$.44
K2 Copyright fees	\$.00	\$.00
K3 Channel additions (Break down below):		
K3a Programming costs attributable to new channels	\$.19	\$.03

	system upgrade costs	\$1.40	\$0.00
K4	System Upgrades (Break down below):		
K4a	Head end and distribution plant upgrades	\$0.00	\$0.00
K4b	Upgrades under social contract	\$0.00	\$0.00
K4c	Upgrades made pursuant to local franchise authority requirements	\$0.00	\$0.00
K5	Inflation adjustments*	\$0.23	\$0.26
K6	Franchise fee increases	\$0.00	\$0.00
K7	Franchise related cost increases (excluding franchise fee increases and LFA required upgrades)	\$0.00	\$0.00
K8	Equipment	\$0.00	\$0.32
K9	Other	\$0.44	\$0.95
K10	Total change (the totals of lines K1 through K9 should equal the differences between the amounts shown on line F3)	\$3.00	\$2.41

*If unregulated, please estimate to the best of your knowledge, but do not double-count inflation that may be included in other categories of Module K

MODULE L: 1997 CABLE CHANNEL CAPACITY AND LINE-UP

		Jul 1, 1997					
L1	Total channel capacity (on analog basis)	83					
L2	Total number of activated channels	79					
L2a	Number of activated channels carrying more than one programming service (shared channels)	2					
L3	Number of channels devoted to premium and/or pay-per-view services	15					
L4	Number of activated channels devoted to each of the following categories:	BST	CPST1	CPST2	CPST3		
L4a	Broadcast Stations (Break down below):	[REDACTED]					
L4ai	Local broadcast stations					10	
L4aii	Other broadcast stations					1	
L4b	PEG (break down below):						
L4bi	Public access channels					1	
L4bii	Educational access channels					1	
L4biii	Governmental access channels					1	
L4c	Local origination programming					1	
L4d	Satellite programming					3	46
L5	Number of channels in each tier					18	46

MODULE M: 1998 CABLE CHANNEL CAPACITY AND LINE-UP

		Jul 1, 1998					
M1	Total Channel capacity (on analog basis)	83					
M2	Total number of activated channels	80					
M2a	Number of activated channels carrying more than one programming service (shared channels)	3					
M3	Number of channels devoted to premium and/or pay-per-view services	15					
M4	Number of activated channels devoted to each of the following categories:	BST	CPST1	CPST2	CPST3		
M4a	Broadcast stations (Break down below):	[REDACTED]					
M4ai	Local broadcast stations					10	
M4aii	Other broadcast stations					1	
M4b	PEG:						
M4bi	Public access channels					1	
M4bii	Educational access channels					1	
M4biii	Governmental access channels					1	
M4c	Local origination programming					1	1
M4d	Satellite programming					3	46
M5	Number of channels in each tier					18	47

CHANNEL LINE-UP FOR JULY 1, 1997

BASIC	CPST1	CPST2	CPST3
B4	O189		
B2	O106		
B8	O230		
O205	N3		
B6	O143		
O227	O93		
B3	O130		
A2	O225		
B5	S7		
B4	A4*		
O248	S11*		
B1	O72		
B4	N10		
O53	C4		
O179	N17		
B4	O85		
A2	O1		
B4	N4		
A1	O236		
	O233		
	O62		
	O114		
	O63		
	A3		
	O157		
	O55		
	O184		
	O58		
	O74		
	C1		
	S8		
	O250		
	O207		
	O98		
	N21		
	O27		
	O35		
	A3		
	O174		
	O129		
	N9		
	O160		
	O194		
	O195		
	S20		
	S3		
	A3		
	O108		
	O218		
	O110		

CHANNEL LINE-UP FOR JULY 1, 1997

BASIC	CPST1	CPST2	CPST3
O117			
O113			
O141			
O106			
O53			
O79			
O191*			
A4*			