

**CONNECT AMERICA FUND PHASE II CHALLENGE RESPONSE OF COX COMMUNICATIONS, INC.**

**METHODOLOGY DESCRIPTION**

Cox Communications, Inc. (“Cox”) hereby submits this information in response to the Commission’s public notice commencing the reply period for the Connect America Fund (“CAF”) Phase II challenge process for price cap territories.<sup>1</sup> Specifically, Cox responds to the list of census blocks that are being proposed as eligible for Phase II support.<sup>2</sup> As shown below and in the attached materials, the Commission should revise the list to remove census blocks that are currently served by Cox to ensure that the Commission’s goal of only providing support to unserved areas is met. As shown below, Cox has identified 285<sup>3</sup> census blocks that should be removed from the proposed list as a result of this challenge response.<sup>4</sup>

**Introduction**

Cox is a broadband, communications and entertainment company that provides advanced digital video, Internet, telephone and home security services over its network. Cox serves approximately 6 million residential and commercial customers and operates in hundreds of communities in 18 states.

Since 1996, Cox has invested more than \$24 billion in infrastructure upgrades to deliver video, phone and high-speed Internet service to homes and businesses in its service areas. More than 99 percent of the serviceable homes in Cox service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation. Throughout Cox

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<sup>1</sup> See Public Notice, *Replies Sought in Connect America Phase II Challenge Process*, WC Docket No. 10-90, WC Docket No. 14-93 (rel. September 26, 2014) (the “Challenge Response Public Notice”).

<sup>2</sup> These census blocks did not appear on the Commission’s initial list of CAF eligible census blocks but parties have argued that they should be classified as unserved (Served-to Unserved challenges)

<sup>3</sup> 237 of these census blocks were challenged by CenturyLink and 48 by Windstream.

<sup>4</sup> Concurrently with this challenge response, Cox is submitting a waiver request that identifies additional census blocks that should be removed from the list.

service areas, Cox offers broadband service with speeds that well exceed 4 Mbps/1 Mbps, the minimum threshold to be deemed “served” for purposes of the CAF Phase II price cap carrier offer of statewide support. Cox has now begun to offer gigabit Internet in selected parts of its service territory.<sup>5</sup>

Cox supports the CAF goal of extending broadband to parts of the country that are unserved. Cox also appreciates the Commission’s efforts to ensure that the Universal Service funds available under the CAF are targeted toward those communities with the greatest need, rather than to areas that already have access to broadband service.

### **Information on Served Areas Included in Served-to-Unserved Challenges**

To assist the Commission in ensuring that CAF funds are directed to truly unserved areas, Cox is providing the information included herein in response to the list of census blocks proposed as eligible for CAF Phase II funding in areas served by Cox. Consistent with the statutory requirement to expend funds only for projects in eligible areas and the Commission’s rules requiring that CAF funding be made available only in areas that do not have broadband service, this information should be used – along with information from other broadband providers – to obtain a clear picture of service availability in the areas that will be proposed for inclusion in the offer of statewide support. This information also should be used to remove census blocks with available broadband service from the served-to unserved challenge list. The list of the census blocks identified by Cox as having voice and broadband Internet service and that should be deemed ineligible for CAF funding is included in Cox’s Form 505 submission.

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<sup>5</sup> Cox has started to roll out its Gigabit Internet speeds to residential customers in parts of Phoenix and Southern California, and is aggressively expanding this deployment with plans to deploy in parts of Omaha and Las Vegas in the first quarter of 2015. On October 28, Cox announced that it is bringing Gigabit Internet to residential customers in Virginia. Cox plans to have gigabit speeds in all of its markets by the end of 2016. The company has been deploying gigabit speeds to businesses for more than 10 years.

The first step in Cox's analysis was to identify census blocks in served-to-unserved challenges where Cox is currently shown as a service provider. Cox was identified in challenges submitted by CenturyLink, Windstream, and Fairpoint. This initial step yielded 758 census blocks in Cox-served states where potential overlap with Cox service areas would most likely exist.

The next step in the process was to determine whether Cox's service area(s) overlapped with census blocks being challenged. Cox's node boundary maps were used to identify overlapping census blocks. These maps depict the coverage area of specific optical nodes and collectively define the geographic footprint where Cox offers its services. Further, these maps are updated when capacity constraints or other upgrades to Cox services require node splits and when Cox deploys additional nodes to expand its geographic reach. These maps are critical to Cox's network and business operations and consequently provide an accurate portrayal of Cox's service area.

The process used to identify overlap involved layering census block and node boundaries on top of each other in MapInfo Professional v12, a GIS program. Node boundaries and census blocks are both closed polygon boundaries with unique IDs assigned to them. After layering, a query is performed to identify where the two layers intersect and the corresponding IDs from both layers where intersections occur are identified.

Using this process, Cox initially identified 752 census blocks where a Cox node boundary intersected with the boundary of a census block included in the Commission's served-to-unserved challenge list. These census blocks were then subjected to further analysis beginning with the identification of serviceable addresses within each census block at issue. A serviceable address represents a location where Cox can, in general, immediately provide broadband Internet

service without the construction of significant physical plant. The determination is driven by guidelines relating to proximity to existing network and by the type of construction involved (e.g., aerial or underground). The process again involves layering as described above. In this case, census blocks represent a boundary layer and addresses represent a point layer. A query then identifies all the address points that fall within each census block.

The focused analysis yielded results that indicated that 463 census blocks included addresses that are currently serviceable by Cox. The remaining 289 census blocks yielded no Cox serviceable addresses but did overlap with Cox node boundaries. For these types of census blocks, in the CAF Phase I, Round 2 challenge process Cox performed an in depth analysis to determine if the census blocks should actually be considered “served” by Cox. However, given the specific criteria established by the Commission defining what it means for an area to be considered “served,”<sup>6</sup> Cox removed these 289 census blocks from further consideration.

To address the Commission’s new criteria concerning what constitute an area being “served,” Cox next analyzed the 463 census blocks containing serviceable addresses. This analysis was focused on the Commission’s requirement that a provider must already have customers in a census block or previously had customers in that census block.<sup>7</sup>

In this stage of the analysis, Cox turned to its billing database – the Integrated Communications Operations and Management System or ICOMS. ICOMS is the primary billing platform Cox uses for all residential and commercial telecommunications services. It contains all product, pricing, and customer-related information necessary to provision, rate and bill for services on a monthly basis. ICOMS also drives serviceability determinations available via

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<sup>6</sup> See Process Public Notice, ¶ 9.

<sup>7</sup> The Commission’s other criteria relate to the “offering” of service and the presence of physical assets. Cox routinely advertises its services via its website and various other means and as such holds itself out to the public as able and willing to provide service. The presence of physical assets is demonstrated by the intersection of node boundaries and census block boundaries as discussed on page 3.

Cox's main website – [www.cox.com](http://www.cox.com).<sup>8</sup> Consequently, the presence of an address in ICOMS is probative evidence that Cox has, or previously had, a customer at the specific address location at issue as required under the Commission's new criteria.

Given the foregoing, Cox compared the addresses available in its initial list of potentially served census blocks with ICOMS addresses. The process used to identify a street address in a census block as currently or formerly being serviced was determined by the use of the analytics tool, Lavastorm 4.6.1. This tool was used to match the street address information compiled by the GIS program to Cox's customer service address information in our billing database, ICOMS. This process employed very stringent matching logic, in effect requiring an exact match between the two different data sources. Where matches were found, Cox is challenging the inclusion of these particular census blocks as potentially eligible for CAF support.

Based on the analysis described above Cox has identified and is challenging a total of 285<sup>9</sup> census blocks that have been proposed to be eligible for CAF funding. As noted above, all of these census blocks are identified in Cox's Form 505 submission. In addition, Cox has provided on Exhibit A accompanying its Form 505 the ICOMS account numbers and associated addresses identified via the process described above for each census block included in its challenge response.

The information provided in this submission relates only to areas served by Cox, but it is apparent from Cox's analysis that there are likely to be other areas outside the Cox footprint that appear in the served-to-unserved challenges list but actually have broadband service available. Consequently, Cox encourages the Commission to use independent due diligence to determine

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<sup>8</sup> While Cox also contracts with other retailers for the provision of similar information, for various reasons the data on these websites may not be as accurate as that provided via the main Cox website.

<sup>9</sup> This total includes 21 census blocks in states where Cox currently receives high cost support. These are included in Cox's challenge response as discussed further below

the extent of other broadband service offerings in the proposed funded service area covered by this submission if other providers fail to submit information prior to the submission deadline.

### **Unsubsidized Competitor Additional Requirements**

As the Commission has noted, for a census block to be considered served in the Phase II challenge process, a provider must meet specific performance and pricing requirements in addition to the threshold requirement of “serving” an area as discussed above.<sup>10</sup> Each of these is discussed below.

#### Speed:

Unsubsidized competitors must provide speeds of at least 4Mbps downstream and 1 Mbps upstream. Throughout its markets, Cox offers a variety of speed tiers (5 total) to its customers. These tiers range from a “Starter Package” providing speeds of 1Mbps/384kbps to an “Ultimate Package” providing speeds of 150Mbps/20Mbps. Cox’s “Essential Package”, the service tier immediately above the “Starter Package”, provides speeds of 5Mbps/1Mbps. Cox’s speed tiers are typically offered uniformly across all markets. Variations may occur for a small period of time as Cox’s speed increases are rolled out in markets on a staggered basis. Please see Attachment 1 for an example of Cox’s speed tier offerings and descriptions.<sup>11</sup> Cox offers at least one tier of service with speeds at the 4Mbps/1Mbps level or higher in each census block identified in Cox’s Form 505 and therefore Cox meets the Commission’s speed requirement.

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<sup>10</sup> In addition to offering broadband service, Cox also offers voice service in the vast majority of its service area and in all of the census blocks included in this challenge response.

<sup>11</sup>These speed tier offerings and descriptions are available at <http://www.cox.com/aboutus/policies/speedsdataplans.cox>.

Usage Allowance:

Unsubsidized competitors must provide at least one service offering with a minimum usage allowance of at least 100GB/month at a price that is reasonably comparable to similar wireline service in urban areas. Cox meets this minimum usage allowance requirement.

Attachment 1 lists Cox's speed tiers along with the applicable monthly data usage plan. Monthly usage amounts range from 50GB (Starter Package) to 400 GB (Ultimate Package). Cox's Essential Package provides 100GB in monthly usage. Since these monthly usage plans are tied directly to the speed tier, they too are offered uniformly across all Cox markets.

Latency:

An unsubsidized competitor must have a round-trip network latency of 100 ms or less. In the CAF context, round trip latency is defined as the time it takes for a signal to travel from the customer premises to the closest designated Internet core peering interconnection point and back to the customer premises.

The FCC has not provided specific guidance on how an unsubsidized competitor can demonstrate that it meets the latency requirement. However, as described in the Commission's October 31, 2013 Phase II Order "carriers participating in the MBA program may use the results from that testing to support certification that they meet the latency requirement."<sup>12</sup> Although the context of that discussion was for price cap carriers receiving CAF Phase II funding, it nonetheless demonstrates the Commission's general view that MBA testing can be used to demonstrate that the latency performance obligation is met.

In support of its certification that it meets the Commission's latency requirement, Cox performed an in-depth analysis of data supporting the Measuring Broadband America program.

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<sup>12</sup> Connect America Fund, *Report and Order*, 28 FCC Rcd 15060, 15072 (2013).

In particular, Cox examined internal panelist data involving a total of 183,000 individual latency tests made during the month of April 2014. The average latency measured by these tests was 25ms. That dataset also revealed that only 1.1% of average latency measurements were greater than 100 ms. Cox's service quality goals are uniform across its footprint, and it engineers its network consistently to meet those goals, so based on this data Cox meets the 100 ms benchmark.

Pricing:

Unsubsidized competitors must offer service in rural areas at prices that are reasonably comparable to those in urban areas. As noted in the challenge process guide provided by the Wireline Competition Bureau, there are multiple ways in which a provider may demonstrate that its prices are reasonably comparable. Among these is the situation where a given provider offers its services in rural areas for the same or lower price offered for the same services in urban areas. This is the case with Cox.

In any given state, Cox offers its services at the same price throughout the state. Thus, there is no differentiation between rural and urban areas.

In addition to the preceding, Cox also meets the pricing requirement from a benchmarking perspective. As noted in the Commission's Challenge process guide, the benchmarking requirement is met when non-promotional pricing for voice service is below \$46.96 and for broadband is below an interim benchmark of \$60.00.<sup>13</sup> As demonstrated in Cox's recent response to the Commission's urban rate survey, Cox's non-promotional rate for unlimited or flat rate local service is \$24.56 and for the broadband "Essential Package" is \$45.59. Both of these prices are well below the Commission's benchmarks.

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<sup>13</sup> On October 29, the Commission released a Report and Order (R&O) establishing the final methodology to be used in establishing the broadband benchmark. Utilizing the equation provided in the R&O, Cox has calculated the benchmark associated with its "Essential Package" to be \$58.03

### **Unsubsidized Competitor**

Except for certain areas in three states – Georgia, Louisiana and Oklahoma – Cox receives no high cost support and therefore qualifies as an unsubsidized carrier. For the reasons described below, and consistent with the guidance provided in the Commission’s July 31 Basic Guide, Cox challenges the status of those areas as subsidized and submits that they should be treated as unsubsidized areas.<sup>14</sup>

Prior to the *Transformation Order*, Cox was a recipient of high cost support in Georgia, Louisiana and Oklahoma as a competitive eligible telecommunications carrier. In each of those states, Cox is now receiving legacy support subject to the phase down adopted in the *Transformation Order*. On its Form 505, Cox has identified 21 Census Blocks in these states where it is receiving phase down support.<sup>15</sup> That support is scheduled to be phased down to \$0 on July 1, 2016 in each of the subsidized areas, but the actual date of the completion of the phase down is subject to the Commission’s implementation of Phase II of the Mobility Fund. As the Basic Guide explains, in such circumstances the Bureau will entertain challenges for the affected Census Blocks.<sup>16</sup> Consequently, Cox requests that these Census Blocks be treated as unsubsidized.

### **Response to Windstream**

Cox’s basic analysis, as described above, is sufficient to demonstrate that Cox offers service in certain census blocks included in the served-to unserved challenge list and effectively rebuts any arguments supporting inclusion of those blocks on the list. Nevertheless, Cox is

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<sup>14</sup> See “A Basic Guide to the Connect America Phase II Challenge Process,” revised July 31, 2014 (the “Basic Guide”), at 5, Item I.K.

<sup>15</sup> Those Census Blocks are indicated on the Form 505 with asterisks.

<sup>16</sup> *Id.*

providing additional comments on the Windstream analysis that resulted in the inclusion of 163 census blocks on the list, including the 48 census blocks included in this challenge response.

Windstream's challenges were based upon a two-pronged analysis described in the declaration of Christopher Raper in Windstream's August 14, 2014, challenge submission. The first prong of the analysis relates to a "Porting Analysis" which Windstream also used in conjunction with the CAF Phase I, Round 2 challenge process.<sup>17</sup>

While ILECs and competitive providers can offer bundle packages that include telephone services, in practice customers are not required to buy the whole bundle; indeed, Cox customers often purchase broadband and video but keep their telephone service with the ILEC or a wireless provider. To illustrate this point, Cox examined the 311 ICOMS accounts associated with the 48 census blocks included in this challenge response. Of these accounts 158, or slightly over 50%, have never had or currently have phone service. Therefore, as the Commission itself has noted, Windstream's analysis, while of some interest, is by no means determinative of whether a particular census block is served by a competitor.<sup>18</sup>

In addition, the Windstream analysis does not incorporate several important factors, including the size and geography of the census block. Census blocks vary significantly in size, with some blocks smaller than a city block. Others may include large areas, such as city parks, where no potential customers are located. Given these factors, it is not surprising that some, or many, census blocks may show no porting activity but yet be served by competitors.

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<sup>17</sup> Cox rebutted the porting analysis during that process and its arguments here are consistent with those previously provided

<sup>18</sup> See Connect America Fund, *Report and Order*, 28 FCC Rcd 7766, 7779 n. 68 (2013) (noting that information on porting is "potentially relevant," but "not determinative" of the question of whether a census block is unserved); see also Connect America Fund, *Report and Order*, 28 FCC Rcd 7211, 7214 n. 19, 7217-8 (Wireline Comp. Bur. 2013) (adopting the same conclusion in the context of the Connect America Fund Phase II challenge process).

To illustrate this, a few data points provide some perspective. Of the 48 census blocks included in this response to the Windstream challenges, 28, or almost 60 percent, have areas of less than one-tenth of a square mile. Further, only one census block has an area greater than one square mile. In terms of serviceable addresses, 41 or approximately 85 percent, are census blocks containing fewer than 20 serviceable addresses. Even if one assumes that Windstream's porting analysis is accurate, these data points demonstrate that for the vast majority of Windstream's challenged census blocks it is plausible that no ports may have occurred, even though the area is indeed served by Cox. Thus, the porting analysis conducted by Windstream is not a reliable indicator of whether there is competition in a specific census block.

There could be many reasons why the Windstream analysis is unreliable, including that it considers only existing customers who ported their numbers (and therefore excludes new customers who do not port their numbers). Regardless of the reasons, Cox's analysis demonstrates that Windstream's porting analysis cannot be relied upon or used to classify an area as unserved.

The second prong of Windstream's challenge is submission of an "IP Traffic Analysis." As a threshold matter, Cox cannot determine exactly how this analysis was conducted and, more importantly, what critical assumptions may underlie the analysis. That said, some key observations regarding IP traffic routing generally are as follows:

- All IP traffic does not traverse all POPs (Internet Point of Presence). Routing policies, congestion, colocation facilities all play a part in how Cox routes its traffic. The Windstream analysis assumes that POPs are the collection point of the IP address data.
- American Registry for Internet Numbers (ARIN) IP blocks are assigned and then broken up individually. No one outside of Cox can tell you where each IP address block ends up going. They are divided up and assigned as needed to each of the Cox markets and for use as corporate resources.

- If the packets are being determined at the destination (web server), there is nothing to say that Cox customers in an area did or did not visit that site in the timeframe data was collected.
- If Domain Name System (DNS) is being used to identify Cox owned IP space (xxx.cox.net), often IP addresses are not entered into the DNS realm immediately. This can result in a period of time where Cox will not show up as the DNS record for any user IP address.

Not knowing how these specific points correlate with the assumptions underlying the Windstream analysis makes it difficult to determine precisely where the analysis may be flawed. However, they do make clear that an erroneous assumption within/as part of the analysis may render the analysis of little value.

As a final matter, Cox examined in some detail two census blocks in Ohio that were included in the Windstream challenge since Cox's data indicated a significant number of homes passed in the blocks. Upon investigation it appears that AT&T is the price cap ILEC providing service in the area. As such, it is not at all clear why Windstream would include those blocks in its challenge and in doing so it calls the reliability of the entire Windstream analysis into question.

Comparing Windstream's flawed analysis to the probative evidence provided by Cox above, it is clear that Cox has met the Commission's preponderance of evidence standard and the 48 census blocks included on Cox's Form 505 form should be considered served and ineligible for CAF Phase II support.

### **Response to CenturyLink**

CenturyLink supported its challenge with a variety of exhibits and associated explanations. Census blocks relating to Cox are contained in Exhibit 6, which purports to show that there is no evidence of voice service being provided by Cox in those blocks. Cox's analysis, as described above, is sufficient to demonstrate that Cox does indeed offer voice service in

census blocks challenged by CenturyLink. Nevertheless, Cox is providing additional comments on the CenturyLink analysis.

CenturyLink states that it engaged GeoResults, Inc. (GeoResults) to determine the presence of voice service providers in 67,702 census blocks in CenturyLink's incumbent local exchange area. The results of the GeoResults analysis are provided in the Declaration of Daniel R. Gordon and summarized in two lists. The first list contains 27,545 census blocks CenturyLink is challenging based on GeoResults definitive results that no provider other than CenturyLink is serving residential customers with fixed voice service in those census blocks. The second list contains 16,062 census blocks that CenturyLink is challenging where GeoResults was not able to identify another provider of voice service.

List 1 contains 289 census blocks associated with Cox. CenturyLink provides a convenient path forward to determine whether Cox provides voice service in any of these areas and therefore potentially easily rebut its own analysis. CenturyLink notes that "the Bureau can and should cross-reference the zip code of the address where voice service is allegedly being provided with the Form 477 database." Cox applied the zip code analysis suggested by CenturyLink. The results of that analysis indicate that 275 census blocks on List 1 are associated with zip codes that were included on Cox's most recent Form 477 filings. This analysis alone, which resulted in a 95% match rate, is ample evidence to show that the GeoResults conclusions cannot be relied upon to determine the presence of a competitive voice provider.

List 2 in Exhibit 6 is even more fundamentally flawed than List 1. By CenturyLink's own admission, for census blocks in this list there was "insufficient data to determine the provision of voice service." While CenturyLink conveniently translates insufficient data to no provision of service, the fact is that insufficient data supports no conclusions – it is insufficient to do so.

Nonetheless, Cox examined census blocks in List 2 to determine if it contained census blocks identified in Cox's detailed analysis described above. This analysis indicated that 175 of the 304 census blocks included on List 2 appear in Cox's Form 505 submission. Again, this is ample evidence to show that the GeoResults conclusions cannot be relied upon to determine the presence of a competitive voice provider.

Comparing CenturyLink's analysis to the probative evidence provided by Cox above, it is clear that Cox has met the Commission's preponderance of evidence standard and the 237 census blocks included on Cox's Form 505 form should be considered served and ineligible for CAF Phase II support.

#### **Waiver Request**

Cox is filing a separate waiver request to address Census Blocks where Cox believes it would be inappropriate and inconsistent with the Commission's goals to provide CAF Phase II funding in light of deployed facilities and other factors.

#### **Conclusion**

Based on information provided herein, Cox submits that the census blocks subject to this challenge response should be deemed ineligible for CAF Phase II support.

**Attachment 1**

Cox Speed Tiers



## Speeds and Data Plans Information for High Speed Internet Service in Middle Georgia

Updated 11/18/13

Cox High Speed Internet service is offered in a variety of different packages of speeds and features designed to fit your needs. The following information describes the current Cox High Speed Internet data plans, pricing and fees, and additional network services information. This information will be updated from time to time as the services, features, price and data plans change. Packages vary by location and not all packages are available in all Cox areas. To view another location, change your selection in the top bar at the right.

### Ultimate Package

Feature	Pricing and Offers Maximum Limit
1. Maximum download speed	150 Mbps
Maximum download speed with PowerBoost® 1	188 Mbps
2. Maximum upload speed	20 Mbps
Maximum upload speed with PowerBoost 1	25 Mbps
3. Monthly data plan 3	400 gigabytes combined download and upload
4. Online file storage (Cox Secure Online Backup)	150 GB

GB = gigabyte(s)  
Mbps = megabits per second

#### Cox Policies

##### Site Policies

[Online Privacy Policy](#)[Visitor Agreement](#)[Cox Forums Terms & Conditions](#)

##### Residential Customers

[Annual Privacy Notice](#)[Annual Customer Notices](#)[Terms and Conditions](#)[Credit Report Notice](#)[Price Lock Guarantee Agreement](#)[Service Protection Plan Terms & Conditions](#)[Billing and Payment Policies](#)

##### Residential Internet Service

[Acceptable Use Policy](#)[Subscriber Agreement](#)[Speeds and Data Plans](#)[Tech Solutions Terms of Service](#)[WiFi Terms of Service](#)

## Premier Package

### [Pricing and Offers](#)

Feature	Maximum Limit
1. Maximum download speed	100 Mbps
Maximum download speed with PowerBoost® 1	105 Mbps
2. Maximum upload speed	10 Mbps
Maximum upload speed with PowerBoost 1	13 Mbps
3. Monthly data plan 3	300 gigabytes combined download and upload
4. Online file storage (Cox Secure Online Backup)	50 GB

GB = gigabyte(s)  
Mbps = megabits per second

## Preferred Package

### [Pricing and Offers](#)

Feature	Maximum Limit
1. Maximum download speed	50 Mbps
Maximum download speed with PowerBoost 1	55 Mbps
2. Maximum upload speed	5 Mbps
Maximum upload speed with PowerBoost 1	6 Mbps
3. Monthly data plan 3	250 gigabytes combined download and upload
4. Online file storage (Cox Secure Online Backup)	5 GB

GB = gigabyte(s)  
Mbps = megabits per second

## Residential Telephone Service

[Customer Agreement](#)

[Telephone Modem Battery Policy](#)

## Business Customers

[Annual Privacy Notice](#)

[General Terms](#)

## Business Data Services

[Acceptable Use Policy](#)

[WiFi Terms of Service](#)

## Business Voice Services

[Customer Telephone Agreement](#)

## Operations Policies

[Internet Service Disclosures](#)

[Procedure for Claim of Copyright Infringement](#)

[Law Enforcement and Subpoenas Information](#)

[Leased Access Information](#)

## Essential Package

### Pricing and Offers

Feature	Maximum Limit
1. Maximum download speed	5 Mbps
2. Maximum upload speed	1 Mbps
3. Monthly data plan <sup>3</sup>	100 gigabytes combined download and upload
4. Online file storage (Cox Secure Online Backup)	1 GB

GB = gigabyte(s)  
Mbps = megabits per second  
Kbps = kilobits per second

## Starter Package

\$24.99 per month. To order, [give us a call](#)

Feature	Maximum Limit
1. Maximum download speed	1 Mbps
2. Maximum upload speed	384 Kbps
3. Monthly data plan <sup>3</sup>	50 gigabytes combined download and upload
4. Online file storage (Cox Secure Online Backup)	1 GB

GB = gigabyte(s)  
Mbps = megabits per second  
Kbps = kilobits per second