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Joiava Philpott
VICE PRESIDENT

March 11, 2015

Ms. Mary Henze
Assistant Vice President
Federal Regulatory
AT&T Services Inc.
1120 20th Street, Suite 1000
Washington, D.C. 20036

RE: Connect America Fund, WC Docket No. 10-90

Dear Ms. Henze:

On January 16, 2015 AT&T notified the Federal Communications Commission (FCC) of its intent to modify its Connect America Fund (CAF) Phase I Round 2 incremental broadband deployment plans. Subsequently, on January 28, the Wireline Competition Bureau released a Public Notice announcing the deadline for existing providers to notify AT&T of any census blocks they currently serve which have been included in AT&T's modified deployment plans.

By this correspondence, Cox Communications is providing notification to AT&T of the census blocks currently served by Cox which have been included in AT&T's modified plans. The attachment to this letter identifies the relevant census blocks, and describes the methodology Cox utilized in determining that the blocks at issue should be considered served by Cox.

A copy of this correspondence is also being filed with the FCC via its Electronic Comment Filing System (ECFS) in WC Docket No. 10-90. Please contact me should you have any questions regarding this notification.

Sincerely,

Joiava Philpott
Vice President, Regulatory Affairs

Attachment

cc: Barry Ohlson

SUPPORTING INFORMATION

CONNECT AMERICA FUND PHASE I (ROUND 2) NOTIFICATION OF COX COMMUNICATIONS, INC.

Cox Communications, Inc. (“Cox”) is providing this information in support of its notification to AT&T that it serves census blocks now being proposed to be served by AT&T with CAF Phase I incremental support.¹ As shown below and in the attached materials, Cox is providing notification that it currently serves 25 census blocks now proposed to be served by AT&T as a result of modifications to its original broadband deployment plans. The list of the census blocks currently served by Cox (along with additional information concerning the speed of available broadband services) is attached as Exhibit 1.

Cox’s Process to Identify Served Areas

To further the Commission’s objective to ensure that CAF funds are directed to truly unserved areas, Cox is providing the information included herein in response to the proposed modifications by AT&T to its original deployment plans. For purposes of this notification, Cox’s process to identify census blocks it currently serves is consistent with that utilized by Cox in filing previous challenges to census blocks proposed to be eligible for CAF support.² For convenience, that process is summarized in the following discussion.

The first step in Cox’s analysis was to narrow the census block list available via the Bureau’s January 28 Public Notice to focus only on states in which Cox provides service. Focusing on these states, this initial step yielded 2144 census blocks in Cox-served states where potential overlap with Cox service areas could exist.

¹ See Public Notice, *Wireline Competition Bureau Announces Deadlines for Existing Providers to Notify AT&T that they serve census blocks that AT&T proposes to serve with Connect America Phase I Incremental Support*, WC Docket No. 10-90, DA 15-118 (rel. Jan. 28, 2015) (the “Public Notice”).

² Cox filed a CAF Phase I challenge on September 27, 2013, a CAF Phase II challenge on August 14, 2014 and a CAF Phase II challenge response on November 10, 2014.

The next step in the process was to determine actual census block overlap. 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 as Cox deploys additional nodes to expand its geographic reach. These maps also 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 a Geographic Information System (GIS) program, in this case, MapInfo Professional v12. 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 114 census blocks where a Cox node boundary intersected with the boundary of a census block included in AT&T's incremental support elections. These census blocks were then subject to further analysis. That analysis began by identifying serviceable addresses within each census block at issue. A serviceable address represents a location where Cox has determined that it can provide service within a standard business interval without the construction of significant physical plant based on guidelines relating to proximity to existing network and the type of construction involved (e.g., aerial or buried). 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 25 of the incremental census blocks identified by AT&T included addresses that are currently serviceable by Cox. Cox believes that its serviceable address data should be the driving factor in the determination of whether areas should be deemed served for the purpose of CAF support. These serviceable addresses are addresses where Cox will provide service on its standard terms and conditions, *i.e.*, with speeds, latency, usage allowances and prices consistent with the Commission's requirements for unserved area challenges. Given this Cox has included 25 census blocks on Exhibit 1 which it considers served for purposes of this notification to AT&T.

Notwithstanding the preceding, Cox nonetheless also conducted further analysis on the 25 census blocks containing serviceable addresses to address the Commission's more recent criteria concerning what constitute an area being "served"³. 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.

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 Cox's main website – www.cox.com. 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

³ This criteria was adopted by the Commission for use in the CAF Phase II challenge process

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.⁴ Of the 25 census blocks identified on Exhibit 1, matches were found for 15 census blocks utilizing this very stringent process.⁵

⁴ During the CAF Phase II challenge process, Cox requested waivers of the Commission's new actual service requirement where the process used in developing Cox's challenge did not result in an exact match between its billing and network deployment databases. The Commission has yet to rule on Cox's waiver requests.

⁵ The remaining 10 census blocks are annotated on Exhibit 1

EXHIBIT 1

Census_Block_15_Digits	State	Maximum Advertised Download Speed (as of 12/31/14)	Maximum Advertised Upload Speed (as of 12/31/14)
220050309002104	LA	150 Mbps	20 Mbps
220330031031052	LA	150 Mbps	20 Mbps
220330047001021	LA	150 Mbps	20 Mbps
220450301001142	LA	150 Mbps	20 Mbps
220710033011017	LA	150 Mbps	20 Mbps
220710033012018	LA	150 Mbps	20 Mbps
220710056024013	LA	150 Mbps	20 Mbps
220710133021008	LA	150 Mbps	20 Mbps
221010410001120	LA	150 Mbps	20 Mbps
221010410001150	LA	150 Mbps	20 Mbps
221010410001164	LA	150 Mbps	20 Mbps
221010410003005	LA	150 Mbps	20 Mbps
221010410003006	LA	150 Mbps	20 Mbps
221010410003019	LA	150 Mbps	20 Mbps
221010414002001	LA	150 Mbps	20 Mbps
220330031031027*	LA	150 Mbps	20 Mbps
220379516002037*	LA	150 Mbps	20 Mbps
220710033012007*	LA	150 Mbps	20 Mbps
220710133021027*	LA	150 Mbps	20 Mbps
221010410001075*	LA	150 Mbps	20 Mbps
221010410001119*	LA	150 Mbps	20 Mbps
221010410001155*	LA	150 Mbps	20 Mbps
221010410001160*	LA	150 Mbps	20 Mbps
221010410002015*	LA	150 Mbps	20 Mbps
221010410003064*	LA	150 Mbps	20 Mbps

* Indicates census blocks with homes passed in mapping data, but no matching addresses in billing data