Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Lifeline and Link-Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	

To: The Commission

COMMENTS OF COX COMMUNICATIONS, INC.

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EXECUTIVE SUMMARY

Based on Cox's lengthy experience as a Lifeline provider, Cox fully supports the Commission's efforts to strengthen the Lifeline and Link Up programs through the instant proceeding. Consistent with the statutory goals of the program, Lifeline programs allow Cox – a trusted provider of communications services nationwide – to offer a competitive voice service option for lower income Americans in many locations, helping to ensure that "consumers in all regions of the nation, including low-income customers, . . . have access to telecommunications and information services" at "affordable rates."[1]

The Lifeline program and its participants will benefit substantially from reforms that: bolster protections against waste, fraud and abuse; control the size of the program; strengthen administration and accountability; and improve enrollment and outreach efforts. Specifically, the Commission should pursue a centralized national database for participant certification and verification, which should help to eliminate duplicate claims. The database should be implemented as quickly as possible and funded in an equitable manner. Adoption of the database also will address a number of other issues in the NPRM, including certification and verification issues, the continued use of self-certification, audits, de-enrollment procedures, and coordinated enrollment.

Pending implementation of the database, Cox supports adoption of the alternative duplicate resolution offered by several ETCs and trade associations rather than the recent Wireline Competition Bureau guidance.

Cox also recommends that the Commission not adopt proposals that will make the program more burdensome, less efficient, or less available to eligible participants. Those proposals include capping the program, imposing additional marketing and outreach mandates, and requiring pro-rata reporting. Cox supports expansion of the income-based eligibility standard and clarification of reasonable charges for the Link Up program.

Finally, the Commission should undertake a pilot program or programs to determine how Lifeline and Link Up could most effectively be extended to broadband services. Cox has devoted significant resources to increasing broadband adoption in its markets and was an enthusiastic participant in the National Broadband Plan team's examination of ways to increase broadband adoption. In considering the most effective approach to increase broadband adoption through the Lifeline program, Cox proposes that the Commission look to its experience with the digital television ("DTV") transition to provide a model for a pilot project to subsidize broadband equipment (e.g., personal computers and smart phones), the cost of which is a major barrier to broadband adoption.

Cox welcomes the opportunity to support the Commission in its revisions to the Lifeline rules, and looks forward to continuing to participate in this valuable program.

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[1] 47 U.S.C. § 254(b)(3).

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COMMENTS OF COX COMMUNICATIONS, INC.

Cox Communications, Inc. ("Cox") hereby responds to the March 4, 2011 notice of proposed rulemaking ("NPRM") issued in the above-captioned dockets.[2] Cox has long been a leader in the provision of high-quality video, voice, and broadband services to consumers and businesses around the country. Cox was one of the first facilities-based competitors in the local telephone business and was a pioneer in offering broadband Internet access over its cable facilities. Cox is now the third-largest provider of video and broadband services, with more than 6 million residential and business customers, and has launched wireless services as well.

As a telephone provider, Cox serves more than 2.6 million customers, providing local and long distance voice service to residential and commercial customers. Cox has repeatedly won awards for the quality of its service, including multiple J.D. Power and Company awards for telephone and Internet service.[3] Cox's long experience as a telephone competitor has included receiving certification as an eligible telecommunications carrier ("ETC") in several states and

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[2] *Lifeline and Link-Up Reform and Modernization; Federal-State Joint Board on Universal Service; Lifeline and Link-Up,* WC Docket No. 11-42; CC Docket No. 96-45; WC Docket No. 03-109, Notice of Proposed Rulemaking, FCC 11-32 (rel. Mar. 4, 2011) ("NPRM").

[3] See Cox Communications, Inc., "Awards and Honors," http://cox.mediaroom.com/index.php?s=59.

providing Lifeline service to low-income customers.[4] Lifeline programs allow Cox to offer a competitive voice service option for lower income Americans in many locations, helping to ensure that "consumers in all regions of the nation, including low-income customers, . . . have access to telecommunications and information services" at "affordable rates,"[5] rates that are often below the prevailing Lifeline rates of the incumbent providers. Because Cox is closely involved with the communities it serves, it can tailor its participation in these programs to local needs. Cox also has devoted significant resources to increasing broadband adoption in its markets.[6]

All of this experience informs Cox's approach to the issues raised in the Lifeline and Link up (collectively, "Lifeline") NPRM. Cox agrees with the Commission that the program will benefit from reforms that: bolster protections against waste, fraud and abuse; control the size of the program; strengthen administration and accountability; and improve enrollment and outreach efforts. As discussed herein, these goals are best achieved by adoption of a centralized national eligibility database, and by reform measures that include expansion of the income-based eligibility standard, clarification of charges for Link-Up service, and implementation of pilot

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[4] Cox currently participates in the federal Low Income USF programs in Connecticut, Georgia, Iowa, Kansas, Louisiana, Nebraska, Oklahoma, and Rhode Island. Cox also is considering or actively pursuing Eligible Telecommunications Carrier ("ETC") status for the Low Income programs in several other states. Finally, Cox participates in the California State Low-Income program.

[5] 47 U.S.C. § 254(b)(1), (3).

[6] *See, e.g.,* Letter from Grace Koh, Policy Counsel, Cox Enterprises, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 03-109 (dated Jul. 22, 2010) attaching a press release announcing Cox's partnership with Louisiana's Lafayette Parish School System; *see also* Letter from William J. Cirone, Superintendent, Santa Barbara County Education Office, to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 09-51 (dated Jun. 24, 2009) discussing Cox's partnership with the Santa Barbara County public school system in the Computers for Families program.

programs for extension of low-income universal service support to broadband services. Pending implementation of the national database, Cox supports adoption of the alternative duplicate resolution process offered by several ETCs and trade associations rather than the recent Wireline Competition Bureau guidance.[7] Finally, Cox does not believe that the Commission's goals would be advanced by an arbitrary cap on the program's cost, the limitation of eligibility to one individual per household, mandatory outreach and marketing measures, or a pro-rata reporting requirement.

I. A NATIONAL CUSTOMER ELIGIBILITY DATABASE WILL ADDRESS MANY OF THE ISSUES RAISED IN THE NPRM

A. A National Database Is the Ultimate Solution to Duplicate Claims

As the Commission has acknowledged, effective measures are needed to ensure that individuals do not receive Lifeline support from multiple ETCs.[8] Cox agrees with the Commission that "a national database or information management system could substantially reduce burdens on consumers, ETCs, States, and the Universal Service Administrative Company ("USAC"); eliminate the need to certify eligibility on a state-by-state basis; and help identify program violations."[9] In the absence of a database, Cox has no effective way to determine if a Lifeline customer is receiving support from another ETC. This was true when the primary participants in the Lifeline program were essentially all wired-service providers; it is even more so today with the advent of many wireless companies. Cox therefore urges the Commission to pursue a national database as the correct solution to duplicate claims.

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[7] *See generally* Letter from Sharon Gillett, FCC, to Richard A. Belden, USAC (Jan. 12, 2011).

[8] *Id.* at ¶¶ 47-64.

[9] *Id.* at ¶ 205.

B. A National Database Also Would Address Other Issues

Besides its potential to prevent duplication of Lifeline support, a national database also would address other issues raised in the NPRM, including certification and verification issues, eligibility standards, audits, de-enrollment, and coordinated enrollment, as discussed below.

Notably, a national database could address certification and verification issues without the need to impose new data collection burdens, such as obligations to collect names, addresses, and Social Security numbers, as part of the Form 497 process.[10] Such new obligations would be needlessly burdensome to ETCs and would, as the NPRM points out, present issues under the Electronic Communications Privacy Act, section 222 of the Communications Act of 1934, as amended (the "Act"), and other privacy laws and regulations.[11]

Determining how to populate the database will give the Commission the opportunity to address how consumers establish their eligibility to participate in the programs, including whether self-certification is appropriate.[12] Critically, however, while the database program is in the development process, the Commission should preserve the ability of consumers to self-certify. Immediately eliminating self-certification would place unnecessary administrative burdens on ETCs, which already are required to maintain extensive records under the federal default rules and state regulations. Preserving the ability to self-certify as an interim measure not only would reduce such burdens, but also would minimize the potential for significant customer dislocation.

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[10] *Id.* at ¶¶ 56-57.

[11] *Id.*

[12] *Id.* at ¶ 170

The database will also substantially simplify low-income audits. Matching carrier records to the database will be much more straightforward than the current process, and may involve nothing more than validating the carrier's procedure for using the database. It is critical that audit procedures are clear and well understood by USAC, auditors, and ETCs. Cox has experienced firsthand the demands placed on carriers in responding to site visits and inquiries by the Payment Quality Assurance ("PQA") Program. While audits are necessary in the current program to control waste, fraud and abuse, the manual comparisons of records to filed claims can be quite labor-intensive and intrusive.

Once the national database is in place, Cox supports the proposal to de-enroll customers that are determined to violate the long-term duplicate-claims rule. Pending adoption of a database, the Commission should employ the de-enrollment rules in the Industry Lifeline Proposal.[13]

In addition, the process of populating a national Lifeline database also will lead logically to coordinated enrollment, which Cox supports as a potential means to increase program adoption and participation. A good example of coordinated enrollment and continued eligibility verification is found in Rhode Island's Universal Service Rules, which allow the Department of Human Services to certify subscribers' initial and continuing eligibility and permit ETCs to rely upon those certifications to enroll and retain customers.[14] This process appears to offer carriers a means of removing some of the uncertainty around self-certification. Cox stresses that any

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[13] *See infra* Section I.D.

[14] State of Rhode Island and Providence Plantations, Public Utilities Commission, Rules and Regulations Governing the Certification and Verification Procedures for Telecommunications Carriers Eligible to Receive Payments from the Federal Universal Service and Certification and Verification Procedures for Compliance with Providing Lifeline and Linkup Service (effective Feb. 4, 2010), available at http://www.ripuc.org/rulesregs/commrules.html (last visited Apr. 15, 2011).

coordinated enrollment program should engage all applicable ETCs and state agencies to ensure that consumers are informed and ETCs can compete fairly.

C. The National Database Must Be Efficiently Funded

Any national database must be funded in a cost-effective manner. Although support from the USF fund is preferable, ETC funding through subscriber or transaction charges, or a hybrid funding method that combines USF monies and funding from ETCs, can be workable if carefully planned and managed. Cox recommends creation of a telecom working group to develop specifications for the database and to issue requests for proposals ("RFPs"), with management of the contracting process assigned to USAC. Contracts for database development and maintenance should contain limited and definite terms to allow for effective oversight by USAC and industry. In light of the project's urgency and potential benefits of the database, appointment of a working group and development of database specifications and issuance of RFPs should be accomplished as quickly as possible, consistent with the timeline in the Industry Lifeline Proposal, discussed below.

D. Pending Establishment of the Database, Cox Supports the April 15 Industry Lifeline Duplicate Claims Resolution Proposal

In the near term, Cox supports the alternative duplicate resolution process offered by several ETCs and trade associations, including Cox, in the letter to the Commission of April 15, 2011 ("Industry Lifeline Proposal").[15] The process described in the Industry Lifeline Proposal is preferable to the current Wireline Competition Bureau's guidance to USAC, which would be burdensome, costly, confusing to Lifeline customers, and likely ineffective as a means of

[15] Letter from United States Telecom Association, CTIA–The Wireless Association®, AT&T, CenturyLink, Cox Communications, Inc., General Communication, Inc., Nexus Communications, Inc., Sprint Nextel Corp., Tracfone Wireless, Inc., Verizon Communications, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 11-42, 03-109; CC Docket No. 96-45 (filed April 15, 2011) ("Industry Lifeline Proposal").

resolving duplicate claims. The proposed alternative process should be administered by USAC and should remain in effect for six months or until the FCC and USAC develop a permanent resolution process using a national database.[16]

As noted in the Industry Lifeline Proposal, the interim rule should carefully address situations where multiple Lifeline subscriptions are being provided to *different individuals* at the same address, and should not automatically presume that such situations are improper or warrant de-enrollment. As the NPRM suggests, there are situations where multiple unrelated individuals, families, or other comparable economic units reside at the same address.[17] These include formal group living situations, such as the residential facilities identified in the NPRM,[18] as well as a range of other circumstances. In Cox's experience, separate families sometimes reside in the same house or even apartment, and it would be unreasonable, and contrary to the goals of Lifeline, to expect them to share a telephone. These situations have become more common in the current economic climate. Further, wired and wireless services are provisioned in separate and distinct manners, with wireless service being sold generally to individuals and wired service being sold generally to specific locations. Failure to consider these factors could result in significant dislocation to needy customers that legitimately require access to Lifeline.

II. OTHER CHANGES WILL IMPROVE THE CURRENT PROGRAM

The Scope of Outreach and Marketing Should Be Determined by the Market. Cox's experience has shown that marketing and outreach efforts are most successful when tailored to local demographics and market conditions. Marketing guidelines and outreach obligations of the

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[16] *See Supra* Section I.A.

[17] NPRM at ¶¶ 52, 117-125.

[18] *Id.* at ¶ 121.

kind discussed in the NPRM would not aid these efforts and likely would be counter-productive.[19] Cox agrees, however, that community-based social service agencies can play a useful role in informing the public about Lifeline-assisted programs, and Cox does not oppose a regulation that mandates a general, one-page description of Low Income Programs to be placed in community outreach locations.[20]

Requiring Pro-Rata Reporting Is Needlessly Burdensome. Requiring ETCs to report pro rata customer counts, or "partials," is overly burdensome.[21] As billing for voice services is done in advance, processing claims for reimbursement and providing proof of those claims in the billing system in the event of an audit is difficult at best. Indeed, Cox currently finds that the administrative burdens of tying claims to billing does not justify the reimbursement for partial months of service, and therefore forgoes reimbursement for customers that are enrolled for less than a full month. The proposed rule for pro-rata reporting, however, should not require Cox to make this choice. In practice, the number of customers enrolling mid-month will be roughly balanced by the number of customers de-enrolling mid-month. Thus, pro-rata reporting should not be required.

The Low Income Fund Should Not Be Capped. Cox supports the Commission's proposals to limit the size of the universal service program by curbing waste, fraud and abuse and improving program administration.[22] However, rather than capping the Lifeline/Link-Up program, which provides much-needed support directly to low-income households, the

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[19] NPRM ¶¶ 226-238.

[20] *Id.* at ¶ 236.

[21] *Id.* at ¶¶ 65-67.

[22] *Id.* at ¶ 144.

Commission should take steps to limit the size of the overall Universal Service Fund by reducing the legacy support provided through the current High Cost Program and better targeting support for broadband through the new Connect America Fund, as proposed in Cox's comments to the USF/ICC NPRM.[23] Low-income households comprise a significant demographic in the households that have not adopted broadband.[24] Limiting Lifeline support, just as the Commission considers the application of the program to broadband services, would not further the goal of universal broadband adoption.

Expanding the Income-Based Eligibility Standard Is Reasonable. Cox supports adjusting the income-based eligibility threshold from 135% to 150% of Federal Poverty Guidelines, which would advance the goal of increasing program participation.[25] This change is particularly warranted in the current economic climate, which has required more families to make difficult choices about their expenditures.[26] This rule change would be entirely consistent with the program's purposes and would provide greater flexibility in the implementation of programs to support adoption of broadband service.

Reimbursable Charges for Link-Up Should Be Clarified. Cox supports the current allowance of 50% off installation charges, up to $30, with residents of Tribal lands eligible for additional support. Cox opposes lowering the $30 cap and reporting of actual installation cost data. Cox supports the proposal that activation fees waived as part of promotions or campaigns

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[23] Cox Comments, *Connect America Fund, et al.*, WC Docket Nos. 10-90 *et al.* (filed April 18, 2011) at 4-11 ("Cox USF/ICC Comments").

[24] *See* John Horrigan, Broadband Adoption and Use in America (Omnibus Broadband Initiative, Working Paper No. 1, 2010) at 13.

[25] NPRM at ¶ 157.

[26] Indeed, for the same reasons that this proposal should be adopted, a cap on the low-income fund should be rejected, as discussed above.

cannot be claimed for Link Up reimbursement. In fact, this is Cox's current practice. However, the Commission should make it clear that any installation charges incurred by eligible low-income customers, either at full standard or reduced campaign/bundle package pricing, are eligible for reimbursement from the Link Up Program.

III. THE COMMISSION SHOULD PURSUE PILOT PROGRAMS FOR SUPPORTING LOW-INCOME CONSUMERS' ACCESS TO BROADBAND

Cox has devoted significant resources to increasing broadband adoption in its markets and has supported the Commission in its efforts to spur adoption.[27] Accordingly, Cox supports extending low-income universal service support to broadband services, beginning with targeted pilot programs that can be used to assess the best approach to a long-term program.[28]

As Cox has previously discussed, a sustainable Lifeline broadband program should be guided by four principles.[29] First and foremost, the program should focus on the customer, by providing flexibility to obtain the necessary equipment and service. Second, the program should not encourage current low-income broadband subscribers to take a lower-speed service. Third, the program should focus on eliminating the affordability barrier. Finally, the program should be large enough to have a real and appreciable effect on broadband adoption.

Cox believes that the Lifeline program can and should be modified to encourage broadband adoption by low-income subscribers.[30] By harnessing the existing Lifeline

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[27] *See, e.g.*, Cox Comments, *The National Broadband Plan; The Role of the Universal Service Fund and Intercarrier Compensation in the National Broadband Plan*, GN Dockets Nos. 09-47, 09-51, 09-137 (filed Dec. 7, 2009) ("Cox NBP USF Comments").

[28] Cox has recently outlined the Commission's authority to provide universal service support for broadband services. *See* Cox Comments, WC Docket Nos. 10-90 *et al.* (filed April 18, 2011).

[29] Cox NBP USF Comments at 12-15.

[30] *See* Cox NBP USF Comments. *See also* Letter of J.G. Harrington, Counsel for Cox Communications, Inc. to Marlene H. Dortch, Secretary, FCC, Apr. 13, 2009, GN Docket No. 09-

infrastructure, the Commission can spur broadband adoption among the low-income population efficiently and inexpensively. Using the Lifeline program is particularly likely to be effective because the components necessary for an effective program already are in place. For example, the Lifeline program already contains the means to identify and designate eligible customers and providers and already has audit and abuse prevention structures in place. Creating a new program would require new structures and processes that would be redundant and unlikely to be more effective than the proven Lifeline approach. Moreover, the Lifeline program is ideally positioned to address the most significant barriers to broadband adoption. One of those barriers is the lack of necessary equipment: Cox's internal research shows that approximately 70% of low-income customers in its markets do not have computers. A voucher program leveraging the existing Lifeline infrastructure, as described in the Cox NBP USF Comments, would address this barrier. The government's experience with the voucher program implemented to facilitate the Digital Television Transition should also inform this effort.[31]

Likewise, installation and service fees represent an independent barrier to adoption, just as they do for telephone customers. The Lifeline and Link-Up programs that today remove these barriers to accessing voice services can provide the same benefits to low-income consumers that wish to subscribe to broadband service. The Lifeline broadband program outlined in the Cox NBP USF Comments could complement and work in concert with other broadband pilot

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40. These comments also were submitted to the National Telecommunications and Information Administration in conjunction with its consideration of how to implement the broadband stimulus provisions of the Recovery Act. *See* American Recovery and Reinvestment Act of 2009 Broadband Initiatives, *Comments of Cox Communications, Inc.*, National Telecommunications and Information Administration Docket No. 090309298-9299-01 (filed Apr. 13, 2009).

[31] *See generally* NTIA, TV Converter Box Program, http://www.ntia.doc.gov/dtvcoupon/index.html (compiling information).

programs, particularly proposals suggesting public-private partnerships addressing costs of broadband service, costs of equipment and increased digital literacy programs for consumers.

To test the viability of a Lifeline broadband program and establish the most effective way to achieve results, the Commission might consider a Lifeline broadband pilot program, based partly on the DTV Transition. Specifically, targeting limited, geographically defined locations throughout the country (*e.g.*, various census tracts throughout the U.S., including some in Tribal Lands) and using the same eligibility criteria as those for current Low Income participants, the FCC and USAC could set aside Low Income USF funds to provide eligible consumers with: (1) a "virtual voucher" to sign up (Link Up Plus) and pay the monthly fees (Lifeline Plus) for broadband service;[32] and (2) a separate virtual voucher to purchase computer equipment.

It is critical that the Commission establish a Lifeline Broadband program that does not dictate the level of broadband service or the type of equipment eligible customers may use. Selecting a speed tier in advance, given the many choices of providers and speeds available, will prejudge customer needs and unduly circumscribe choices. Also, many eligible customers might already subscribe to broadband services and should not be required to switch service levels simply to become eligible for the program. However, the vouchers should be set at a sufficiently high level to provide sufficient discounts for the initiation fee, cost of computers and monthly installation fee for most broadband services.

A pilot program of this kind would offer a number of benefits. Notably, most service providers offering broadband are familiar with the Lifeline program, which is generally regarded

[32] The current Link-Up and Lifeline discounts for activation of, and subscription to, telephony services already operate as virtual vouchers inasmuch as eligible customers call the providers and sign up for service, and the providers are reimbursed "behind-the-scenes" for the discounts extended. Of course, these are not direct vouchers (as would be the case for equipment purchases, for example), because the customer gets the discounts without having to do anything beyond providing information that she or he is eligible.

as working well.[33] Therefore, expanding Lifeline to include broadband should not be overly difficult to achieve. Also, the discounts already target low-income Americans, often certified by states or providers as being eligible for program participation. Rules in place today would not need to be recreated. Finally, USAC would administer the program, eliminating the need for additional government enforcement agencies.

Cox recognizes that such a program would require some creativity in its application. Notably, broadband service providers do not distribute and support computer equipment, but might act as conduits to distribute the vouchers for equipment purchases to eligible customers that subscribe to their broadband service, allowing customers to redeem the vouchers with retailers; or might partner with computer manufacturers to distribute discounted computers, much as they do today for cable boxes or high-speed modems.

Finally, the Commission must give careful consideration to which entities participate in the pilot program. As broadband is incorporated into Federal Universal Service Programs and consistent with Cox's comments filed in the USF/ICC NPRM, the Commission "should evaluate the extent to which it can make funding available to entities that are not eligible telecommunications carriers ("ETCs") or, if that is not possible, how it can make it easier for providers to become ETCs."[34] Should the Commission determine that ETC status is a prerequisite for providing Lifeline service, however, Cox's experience has shown that the procedure for qualifying as an ETC for Lifeline service is relatively more straightforward than the qualification process for becoming a high-cost ETC.

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[33] *See, e.g.*, NPRM at ¶ 1.

[34] Cox USF/ICC Comments at 8.

CONCLUSION

Cox urges the Commission to adopt reforms to the Lifeline and Link-Up programs consistent with these comments. Cox welcomes the opportunity to support the Commission in its revisions to the Lifeline rules, and looks forward to continuing to participate in this valuable program.

Respectfully submitted,

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