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BEFORE THE ARIZONA CORPORATION COMMISSION

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CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

Arizona Corporation Commission

DOCKETED

APR 05 2002



RT-00000J-02-0066
APR 5 2002

IN THE MATTER OF DISSEMINATION OF
INDIVIDUAL CUSTOMER PROPRIETARY
NETWORK INFORMATION BY TELECOM-
MUNICATIONS CARRIERS

Docket No. RT-00000J-02-0066

COX ARIZONA TELCOM'S
RESPONSE TO STAFF'S FEBRUARY 15, 2002
CPNI ISSUES LIST

Cox Arizona Telcom, L.L.C. ("Cox") submits the following responses to the Commission Staff's February 15, 2002 memorandum regarding CPNI issues. In general, Cox believes it is preferable to have a single national standard for treatment of CPNI because most telecommunications carriers are multi-jurisdictional. Different standards in different jurisdictions lead to increased administration issues and costs. As the Commission knows, the FCC is in the process of a rulemaking to address CPNI issues. Cox urges this Commission to allow the FCC to complete that process. At that point, the Commission can take action it deems appropriate that is consistent with the FCC. It will not have to revisit CPNI issues in response to the FCC's actions.

1. The following questions relate to the adoption of an Opt-In policy for use of CPNI as opposed to an Opt-Out policy:

1.a Does your company currently share CPNI with other affiliated entities? Does your company use an opt-in or opt-out policy for CPNI sharing? When did you implement this policy? Please provide a copy of the notice that your company sent to its Arizona customers. If you have used an opt-out policy, please provide any data you may have regarding the percentage of customers which opted out and identify the costs

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associated with administering an opt-out policy.

RESPONSE: Cox shares CPNI information with its affiliated entities to use exclusively for Cox-related business purposes. Since September 2000, Cox has followed an opt-out policy consistent with current FCC requirements. Cox provides the notice as a bill message to phone customers in the first billing to the customer. Cox also provides annual notice of the opt-out policy for its telecommunications service in connection with its Annual Privacy Statement that it provides for all of its services, inclusive of its cable, data and telephone. This Annual Privacy statement is mailed separately to all cable and telephone customers. Copies of Cox's bill message and annual notice are attached. Only a minimal percentage of customers opt-out in response to the notice. Cox has not quantified the costs associated with the opt-out policy, but those costs would include cost of the bill message and annual privacy statement as well as the administrative cost of ensuring that customers who opt-out are not included in any information provided to affiliated entities.

1.b Prior to the Tenth Circuit Decision which vacated portions of the FCC rules, did your company share CPNI with other affiliated entities? Did your company use an opt-in policy as required by the FCC rules? Please provide any data you may have regarding the percentage of customers opting in and the costs associated with administering an opt-in policy.

RESPONSE: Prior to the Tenth circuit decision, Cox shared CPNI information with affiliated entities only if the customers had opted in. Opt-in was done on a real time basis with the customer on the phone. Cox does not have any recent substantive data concerning the percentage of customers who opted in. Opt in costs were (and would be) significantly higher for an opt-in policy, although Cox has not quantified those costs.

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1.c Please identify any competitive concerns associated with the use of an opt-out versus an opt-in policy. If there are competitive concerns associated with an opt-out policy, please identify them with specificity and describe how any adverse competitive impacts would actually occur.

RESPONSE: The use of an opt-in policy would increase the costs of services to customers. This could put a LEC at a disadvantage to competitors that may not need to use an opt-in policy, such as (potentially) wireless providers and internet telephony providers who position themselves as long distance providers that also carry local exchange and local toll traffic. It could also limit the customer's access to information about new services or more competitive service packages or pricing.

1.d Is the "implied consent" assumed by an opt-out policy consistent with the language of Section 222 of the Federal Act? Please identify any harms associated with "implied consent" for release of individually identifiable CPNI collected by telecommunications carriers.

RESPONSE: Cox takes no position on this issue at this time.

1.e Do you agree with the Tenth Circuit's finding that communications between telecommunications carriers and their affiliates, divisions and employee constitute "commercial speech" for First Amendment purposes?

RESPONSE: Cox takes no position on this issue at this time.

1.f Does a consumer's privacy interest in CPNI rise to a level such that there is a substantial state interest in its protection? The Tenth Circuit identified a substantial state interest in protecting people from the disclosure of sensitive and potentially embarrassing personal information. Please identify any other substantial state interests involved?

RESPONSE: Cox takes no position on this issue at this time.

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1.g Does the fact that the Arizona constitutional right to privacy has been interpreted more broadly than the Federal Constitution support the adoption of an opt-in policy in Arizona?

RESPONSE: Cox takes no position on this issue at this time.

1.h Is an opt-out policy sufficient to protect the substantial state interests involved in protecting people from the disclosure of sensitive and potentially embarrassing personal information?

RESPONSE: Cox takes no position on this issue at this time.

1.i How would an opt-in policy alleviate concerns identified with the release of individually identifiable CPNI? Is an opt-in policy sufficiently narrowly tailored to overcome any First Amendment concerns or should the Commission consider a more flexible opt-in policy?

RESPONSE: Cox takes no position on this issue at this time.

1.j Does your company disclose CPNI to any non-affiliated companies? Under what circumstances would you release CPNI to a non-affiliated company?

RESPONSE: It is Cox's policy not to disclose CPNI to any non-affiliated entity.

1.k Please comment on Arizona Revised Statutes Section 40-202(C)(5) and the importance of it with regard to any rules that the Commission adopts.

RESPONSE: A.R.S. § 40-202.C.5 should be applied in a manner that does not conflict with applicable federal law.

1.l Would an opt-in policy result in additional benefits to consumers relative to an opt-out policy? Explain in detail why or why not.

RESPONSE: No. Consumers may not learn about or have prompt access to additional services or service packages.

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1.m Is the CPNI data collected by telecommunications companies different from the personal data collected by companies in other industries (e.g., banks)? If so, do those differences provide support for an opt-in policy as opposed to an opt-out policy? Explain in detail why or why not.

RESPONSE: Cox takes no position on this issue at this time.

1.n Would an opt-in policy result in any additional costs to telecommunications providers relative to an opt-out policy? Explain in detail what the source of the additional costs would be, if any.

RESPONSE: Yes, there would be significant additional administrative costs, including substantial software upgrades, data base modifications, and increased monitoring. In addition, marketing costs could increase due to a need to use more mass marketing and less targeted marketing.

1.o What is the difference in customer response likely to be if an opt-in policy is used instead of an opt-out policy? Explain in detail the basis for your answer, citing any studies that support it.

RESPONSE: Cox does not understand the question and cannot respond.

1.p Would an opt-in policy create any logistical or administrative problems for telecommunications companies relative to an opt-out policy? Explain in detail the basis for your answer.

RESPONSE: See response to 1.n above.

2. The following questions relate to the content and format of the notice telecommunications companies provide to their customers regarding CPNI:

2.a Do the issues regarding such notice change substantially if an opt-in policy is used instead of an opt-out policy? Please explain in detail.

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RESPONSE: There should be no significant difference in the notice except the difference between opt-out and opt-in.

2.b Should notice be provided in multiple languages? If so, what languages should the notice be provided in?

RESPONSE: Yes, if the Commission determines it is appropriate based on the demographics of a service area.

2.c Should rules be adopted to regulate the form that such notice should take, e.g. should the notice be required to be on a separate page, should a specific font size be required, etc.? If so, what should the requirements of such a rule be? Please explain and support your answer in detail.

RESPONSE: It would be appropriate to adopt a standard default format that is not unduly burdensome and that can be modified subject to Commission approval.

2.d Should rules be adopted to regulate the content of such notice? If so what should be required? Please explain and support your answer in detail.

RESPONSE: It would be appropriate to adopt a standard default format that is not unduly burdensome and that can be modified subject to Commission approval.

2.e Should rules be adopted that standardize the title and labeling of such notice? If so what should be required? Please explain and support your answer in detail.

RESPONSE: It would be appropriate to adopt a standard default format that is not unduly burdensome and that can be modified subject to Commission approval.

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1 2.f Is the CPNI data collected by telecommunications companies
2 different from the personal data collected by companies in
3 other industries (e.g., banks)? If so, do those differences
4 provide support for imposing different noticing requirements
5 for telecommunications companies than those faced by
6 companies in other industries? Explain in detail why or why
7 not.

8 **RESPONSE:** Cox is not knowledgeable of data collection procedures of other
9 industries, such as banks. Cox abides by state and federal regulations which are
10 separate and distinct from the regulations imposed on other industries. Cox takes no
11 position on this issue at this time.

12 3. The following questions relate to how often telecommunications
13 companies should be required to provide notice of CPNI issues:

14 3.a For existing customers how often should telecommunications
15 companies send notice of their CPNI policies if an opt-in
16 system is used? If an opt-out system is used? Please explain
17 your answer in detail.

18 **RESPONSE:** A minimum of one time per year.

19 3.b For new customers when should telecommunications
20 companies send notice of their CPNI policies if an opt-in
21 system is used? If an opt-out system is used? Please explain
22 your answer in detail.

23 **RESPONSE:** The notice should be provided within the first billing cycle and CPNI
24 should not be provided to affiliated companies for at least 30 days after the notice
25 to allow customers adequate time to respond.

26 3.c For customers that are terminating service with a given
27 company, is any notice of CPNI policies necessary if an opt-in
system is used? If an opt-out system is used? If so, explain in
detail what is necessary and why it is necessary.

RESPONSE: No. Sufficient notice has already been provided by that point.

1 4. The following questions relate to the responsibilities telecommuni-
2 cations companies should have for CPNI data of former customers:

3 4.a If a customer terminates service with a given company should
4 the company be obliged to destroy that customers CPNI data?
5 Explain in detail why or why not.

6 **RESPONSE:** No. FCC regulations require that companies retain billing records for 18
7 months. Federal law permits a retail customer to file a cause of action for up to 24
8 months. Retention of records also meets litigation needs and law enforcement
9 needs.

10 4.b If a customer terminates service with a given company should
11 the company be permitted to use that customers CPNI data to
12 market to that customer? That is, should companies be
13 permitted to use CPNI data in win-back efforts? Explain in
14 detail why or why not.

15 **RESPONSE:** Yes, it is consistent with FCC policies encouraging competition through
16 CLEC win back programs. In addition, 47 U.S.C. § 222 sets forth allowable uses
17 for such information.

18 4.c If a customer terminates service with a given company should
19 the company be permitted to use that customers CPNI data for
20 any purpose? Explain in detail what should and should not be
21 allowed and why?

22 **RESPONSE:** Yes. See response 4.b above.

23 5. The following questions relate to the verification telecommunica-
24 tions companies provide to their customers that have opted-in or
25 opted-out:

26 5.a If an opt-out system is used, should companies be required to
27 provide notice to their customers that they have successfully
opted-out? Should companies be required to provide notice to
their customers that they have not chosen to opt-out? Explain
in detail why or why not.

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RESPONSE: No. It is generally unnecessary and creates increased costs, administrative difficulties and potential customer confusion.

5.b If an opt-in system is used, should companies be required to provide notice to their customers that they have successfully opted-in? Should companies be required to (or allowed to) provide notice to their customers that they have not chosen to opt-in? Explain in detail why or why not.

RESPONSE: See response 5.a above.

5.c For either an opt-in or opt-out system, should rules be adopted to govern the form of verification notices? If so, what should be required? For example, should verification be required to be in writing or telephonic verification acceptable? Explain and justify your answers in detail.

RESPONSE: See response to 5.a above. If deemed necessary, It would be appropriate to adopt a standard default format that is not unduly burdensome and that can be modified subject to Commission approval.

5.d For either an opt-in or opt-out system, should rules be adopted to govern the content of verification notices? If so, what should be required? Explain and justify your answers in detail.

RESPONSE: See response to 5.c above.

6. What obligations should telecommunications companies have regarding CPNI data for customers who have opted-out (or not opted-in)?

RESPONSE: Those obligations should be governed by 47 U.S.C. § 222.

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1 7. The following questions relate to the sharing of CPNI data with
2 affiliates or non-affiliates:

3 7.a Should there be restrictions placed on the entities that
4 telecommunications companies can share CPNI data with?
5 For example, should companies be permitted to sell CPNI
6 data to outside entities or should the sharing of CPNI data be
7 limited to affiliates? Does 47 U.S.C. Section 222 permit
8 CPNI sharing with non-affiliates under any circumstances?
9 Provide detailed justification for your answer.

10 **RESPONSE:** The restrictions should be consistent with the content of the notice
11 provided to customers concerning use of CPNI and with 47 U.S.C. § 222.

12 7.b If telecommunications companies profit from the sale of
13 CPNI data should there be a requirement that they share those
14 profits with the customers who have opted-in or not opted-
15 out? For example, should such customers receive discounts?

16 **RESPONSE:** It is Cox's policy not to provide or sell CPNI data to non-affiliated
17 entities.

18 7.c Should there be any restrictions on how CPNI data is used by
19 affiliated of telecommunications companies? If so, what are
20 they and how could such requirements be enforced? Justify
21 your answer in detail.

22 **RESPONSE:** The restrictions should be consistent with the content of the notice
23 provided to customers concerning use of CPNI and with 47 U.S.C. § 222.

24 7.d Should there be any restrictions on how CPNI data is used by
25 non-affiliates of telecommunications companies? Is so, what
26 are they and how could such requirements be enforced?
27 Justify your answer in detail.

RESPONSE: It is Cox's policy not to provide or sell CPNI data to non-affiliated
entities.

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8. Besides an all-inclusive opt-out or opt-in policy, is there merit to a partial opt-in policy? That is, is there merit to requiring an opt-in policy for some categories of customers but allowing an opt-out policy for other categories? Explain in detail why.

RESPONSE: Probably not depending on the categories. It would be difficult and costly to administer.

RESPECTFULLY SUBMITTED April 5, 2002.

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**2000
CUSTOMER
INFORMATION**

- **Notification of Customer Rights
Under the Cable Communications
Policy Act of 1984**
- **Notification of Privacy Rights of Telephone
Customers**
- **Television Equipment Compatibility Notice**
- **Television Picture Quality Resolution
Notification**

**Cox Communications
Address
City, State, Zip Code
Telephone Number
Business Hours**

**NOTIFICATION OF CUSTOMER RIGHTS
UNDER THE CABLE COMMUNICATIONS
POLICY ACT OF 1984**

Dear Cable and/or Internet Customer:

As a customer of Cox Communications ("Cox" or "we") subscribing to cable television services, you are entitled under the Cable Communications Policy Act of 1984 (the "Cable Act") to know the limitations imposed upon cable operators in the collection and disclosure of personally identifiable customer information, the type of personally identifiable information collected, how such information is used, under what conditions it is disclosed, the period during which it is maintained and the rights of customers concerning access to such information and its disclosure. Cox also applies the information policies of this law to Internet access services to which you subscribe.

The law and its policies relate only to personally identifiable information. It also applies only to information that you have furnished to us or certain information that is transmitted over our cable facilities. Some of our services permit you to direct communications outside of our system and this law does not apply to these communications. For example, this law does not apply to information that you have directed to third parties over the facilities of on-line providers or over the Internet.

1. Collection and Use. To better provide you with reliable, high-caliber service, Cox keeps regular business records that contain the following types of personally identifiable information: name, service address, billing address, home and/or other telephone number(s), social security number or driver's license number, premium service subscription information (including the movies that you have ordered on pay-per-view channels), and customer correspondence and communications records. We also maintain information concerning billing, payment, security deposits and maintenance and repairs, as well as other service-related information. For Internet access service, the cable system may automatically collect or facilitate the collection of information on customer use of the service, including information on the choices that a customer makes along the range of services offered, when a customer visits a site, and how long he or she visits the site.

We collect, maintain and use this information, generally to conduct business activities related to providing you with cable television, Internet access service, and other services, and to help us detect theft of service. Our detailed business records are used, and personal information contained in them disclosed, generally to help ensure you are being properly billed for the services you receive, to send you pertinent information regarding your cable services, to improve the quality of the services we provide to you, and for other service-related activities. More specifically, this information is used for financial, legal, tax and accounting purposes, to sell, install, maintain and disconnect services, to bill and collect charges for the services to which you subscribe, to gauge customer satisfaction and improve programming and marketing

plans, for customer mailings related to the services we offer, and to answer questions from you concerning your bill and services provided to you. We take all reasonable precautions to identify you or your authorized representative as the inquirer on your account and to otherwise prevent unauthorized access to your account information.

Cox will not use any electronic device attached to the cable television wires for the purpose of recording, transmitting, or observing any events or listening, recording, or monitoring any conversations which take place within your residence, work place, or place of business without obtaining your express written or electronic consent.

2. **Disclosure.** **Cox considers the personally identifiable information contained in our business records to be confidential and will not disclose it without your prior written or electronic consent except as provided in this notice.** We may disclose this information, however, if the disclosure is necessary for rendering or conducting a legitimate business activity related to a cable service, Internet access service or other service Cox provides to you. Consequently, we may, for example, from time to time disclose information to our employees, attorneys, outside auditors and accountants as required, program guide distributors, collection agencies, construction and installation contractors, consumer and market research companies, software vendors, and affiliated providers of Internet access services or Internet content services.

Cox will not make personally identifiable information about you available to government entities unless we are required to do so by court order, and we will notify you of the court's order before disclosing the information. Before the court will order us to disclose any personally identifiable information, the government entity seeking the information must offer clear and convincing evidence that the subject of the information is reasonably suspected of engaging in criminal activity and that the information sought would be material evidence in the case. If a government entity is seeking personally identifiable information about you under these circumstances, the court must afford you the opportunity to appear and contest the government entity's claim.

In the event you are a customer of Cox's High Speed Internet Access Service, you have expressly granted permission to Cox to disclose, without prior notice to you, information relating to your account such as the name and address associated with a given IP address or e-mail account in response to:

- (a) a subpoena issued in a civil or criminal investigation or litigation;
- (b) a civil investigative demand issued by a government entity;
- (c) a court order;
- (d) a law enforcement agency request based on emergency conditions such as an imminent threat to life and limb or substantial damage or destruction of property. Examples of such emergency situations would include bomb threats, kidnappings,

extortion threats, identifying the service address of a suicidal party, and threats to critical governmental or private sector computer systems and databases.

While we do not currently sell lists containing the names and addresses of our customers or otherwise release customer lists to third parties not facilitating our services to you, the law permits Cox to disclose names and addresses only of its customers to charities, marketing organizations or other businesses for use in mailing lists, telephone or mail solicitation, market research or other uses. You have the right to limit or prevent your name and address from being included on such a list. If you wish to be excluded from any such list, you must notify us in writing at the address listed on the front cover of this notice.

3. Retention. Cox maintains the information in our regular business records as long as you are a customer and for a longer time if necessary for our business purposes. Unless a court has asked us for access to this information, we will destroy it once it is no longer necessary for our business purposes.

4. Subscriber Rights. Cox will make available for your examination any personally identifiable information about you contained in our business records within a reasonable period of time, and in no event later than ten (10) days after we receive your written request to examine the information. You shall be responsible for the cost of copying any documents you request. We will make this information available during normal business hours at the Cox office listed on the front cover of this notice, and will give you an opportunity to correct any error in the information we maintain. Section 631 of the Cable Act gives you specific rights if these provisions are violated. If you believe that a violation of these provisions of the Cable Act has caused you harm, you may bring a civil action for damages in United States District Court.

NOTIFICATION OF PRIVACY RIGHTS OF TELEPHONE CUSTOMERS

Dear Telephone Customer:

Cox also has a policy to protect our telephone customer's network information as well as their identity if they request to be unlisted, unpublished or request to have their identity not disclosed. Cox does not provide the identity of any customer who requests a non-published number and does not sell any of its telephone customer information. Cox also adheres to the Federal Communications Commissions rules and provisions as set forth in the 1996 Telecommunications Act which pertains to the protection of customer proprietary information, information such as our customer's call patterns, service features, price plans, spending profiles, call destinations; i.e. information on how our customer's use our telephone service. Cox also applies the information policies described above in the notice to cable and Internet customers, where consistent with the telephone policy described in this notice.

Cox prides itself on its ability to provide its customers a high-level advanced telecommunication service, including local calling, long distance, high-speed data and video service. As such, Cox will access your telephone service information to identify and notify you of new service offerings when they become available or when we determine new pricing plans, which may save you money. These existing or new services maybe offered by affiliated companies of Cox yet this information will not be disclosed to third parties outside of Cox, except as otherwise required by law. If you prefer that Cox not access such information you may either call or write Cox at the number and address listed above. Otherwise, your consent will enable Cox to use your information and your decision will remain in effect until you notify Cox that you wish to either revoke or change your existing consent. Your decision on whether to provide consent to Cox will in no way affect the services you currently receive.

TELEVISION EQUIPMENT COMPATIBILITY NOTICE

Q: Do I need a cable converter and where can I get one?

A: Some models of TVs and VCRs – especially older TV sets that are not “cable ready” - may not be able to receive all of the channels offered by the cable system when connected directly to the cable system. If your TV or VCR is not able to receive all of the channels offered by the cable system when connected directly to the cable system, you can obtain a set-top channel converter or other equipment from Cox or a retail store at a nominal charge to enable your TV and VCR to receive all cable channels. Please note that some Cox premium or Pay-Per-View channels may not be available with a retail receiver. Also, you should know that receivers with descrambling units are illegal to sell or use unless authorized by Cox.

Q: Will I need additional equipment?

A: Where service is received through a set-top channel converter, you may not be able to use special features and functions of your TV and VCR, including, but not limited to, features that allow you to: view a program on one channel while simultaneously recording a program on another channel; record two or more consecutive programs that appear on different channels; and, use advanced picture generation and display features such as “Picture-in-Picture” and channel review. Cox may be able to resolve these issues through the use of an additional converter or other equipment which is available for lease upon request.

Q: Where can I get a remote control?

A: Remote control units that are compatible with set-top channel converters or other terminal equipment may be obtained from Cox or from sources other than Cox Communications, such as retail outlets. A list of compatible remote control models is enclosed. You are encouraged to contact Cox Communications to inquire about whether a particular remote control unit would be compatible with your equipment.

Please note that customer owned remote control units may not be functional if Cox Communications changes the set-top channel converter or other terminal devices.

COMPATIBLE TELEVISION REMOTE CONTROL MODELS
[insert manufacturer(s) and model number(s)]

**TELEVISION PICTURE QUALITY
RESOLUTION NOTIFICATION**

Q: What do I do if I have a poor quality picture on my TV?

A: Upon experiencing problems with the quality of television signals that you receive, you should call the cable company at the telephone number listed on the front cover of this notice. A fully-trained Customer Service Representative will do all possible to resolve your problem over the telephone. If this cannot be done, an appointment will be established to have a skilled technician come to your home in order to resolve your reception problem. If, in your opinion, the service technician fails to correct the reception problem, you should call us again and we will review the actions taken. Should we continue to be unable to resolve the problem to your satisfaction, we will inform you of our determination, and the reasons we cannot solve the problem.

Q: What if Cox cannot resolve my problem?

A: Cox Communications serves multiple franchised areas. If you believe Cox has not properly resolved your issue, please contact the applicable franchise authority at the address and telephone number listed on your monthly cable bill.

September 5, 2000
Account Number: 001 7210 043883210

405 S 16TH ST
APT 1102
OMAHA NE 68102-2613 05
Page 1 of 4

Previous Balance	Payments Received	Adjustments	Amount Past Due	Current Charges	Total Due	Due By
\$199.97	\$0.00	\$0.00	\$199.97	\$63.95	\$253.92	Aug 29, 2000

Current Charges as of September 5, 2000
Total Cable Services 48.04
Total Taxes 5.91
Total Current Charges \$63.95

Questions?
CUSTOMER SERV: 402-933-3000

On-Line: www.cox.com/omaha

About Your Account

*****PAST DUE NOTICE***** Your payment may have crossed in the mail with this bill. If it did, please disregard this notice. Our records indicate the balance on your last bill was not paid by the due date. A late fee has been charged. **PLEASE RUSH PAYMENT** to our office to avoid interruption of service. If there is anything we can do to help clear up this matter, please call 933-3000. Both front counters are open 8AM-6pm Mon.-Fri. Our 50th & Dodge St. front counter is open Saturdays, 9AM-2PM. Cox accepts VISA, Mastercard, and Discover Card.

What's New from Cox

The Universal Fund Fee is \$.20/month per account and supports the Universal Service Fund created by the FCC which helps provide affordable telecommunications services for low-income families and remote areas and advanced services like Internet access to eligible organizations. All long distance carriers pay into this fund. The Carrier Line Fee is \$.85/month per Cox Long Distance account and helps recover a portion of fees paid to local telephone companies for access.

Continued on reverse...

FRANCHISING AUTHORITY: OMAHA CITY COUNCIL 1619 FARNAM STREET OMAHA, NE 68103 CUID 402-444-0320



11805 W. DOOGUE ROAD
OMAHA, NE 68154-2836

Account Number:
001 7210 043883210
Total Due: \$253.92
Payment Due By:
Aug 29, 2000

Please return this portion with your payment.

Amount Enclosed \$ _____

Allow 7 days for mail processing. Please include your account number on your check. Make checks payable to Cox Communications. Payment of this bill confirms your subscription to services and possession of equipment as listed.

07210001132043883210720025392

6400 0010 XW RP 10 00115 00132000 YMYNNN

405 S 16TH ST
APT 1102
OMAHA NE 68102-2613

COX COMMUNICATIONS
P.O. BOX 2167
OMAHA NE 68103-2167

8400 0010 XW RP 13 00113 00132000 YC07NNN
September 5, 2000
Account Number: 001 7210 0 43883210

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What's New from Cox continued

Identification of Telephone Customer's Right of Privacy

Cox has a privacy policy to protect our telephone Customer's Proprietary Network Information, "CPNI", as well as to protect our customer's identity if so requested. Specifically, Cox does not sell any of its telephone customer information. Cox adheres to the Federal Communications Commission's rules and the provisions as set forth in the 1996 telecommunications concerning its telephone customer's privacy. CPNI is information relating to your call patterns, service features, price plans, spending profiles, and call destinations.

CPNI does not include subscriber-listing information, i.e. name, address and telephone number. Cox needs to review your account information in order to provide you the best package of services. As such, Cox will access your CPNI to identify and notify you of new service offerings when they become available or when we determine new pricing plans, which will save you money. These existing or new services may be offered by affiliated companies of Cox yet this information will not be disclosed to third parties outside of Cox except as required by law.

If you prefer that Cox not access such information, you may either call or write Cox at the numbers and addresses listed above. To give us your consent, you do not need to initiate any action. Your consent will enable Cox to use your CPNI and your decision will remain in effect until you notify Cox that you wish to either revoke or change existing consent. Your decision on whether to provide consent to Cox will in no way effect the services you currently receive.