

COX TMI WIRELESS LLC

700 MHZ PERFORMANCE STATUS REPORT

Cox Communications Inc., on behalf of its wholly-owned licensee subsidiary Cox TMI Wireless LLC d/b/a Cox Wireless (collectively “Cox”) and pursuant to Section 27.14(l) of the Commission’s rules,¹ reports on the status of its efforts to meet the performance obligations associated with the 700 MHz commercial services licenses it acquired in Auction No. 73 (the “Cox 700 MHz Licenses”). The information required by Section 27.14(l) for each Cox 700 MHz License is set forth in Exhibit A, as well as more generally discussed below.

Cox has long been an innovator in the communications marketplace, recognized as a cable industry leader in the offering of competitive services to its customers. Committed to its continuing efforts to innovate and develop new and unique services for consumers, Cox has pursued, and is continuing to consider, various options to add mobile capability to its suite of offerings.

Starting as a “greenfield” provider in the wireless marketplace, however, has brought several challenges to the development and deployment of a wireless business. In addition to the challenge of competing against existing providers, Cox has faced a marketplace where technologies, services and consumer demand are evolving at an unprecedented pace. As a result, Cox announced in mid-November that it would discontinue selling its “Cox Wireless” 3G wireless phone service, which it currently provides via an MVNO agreement with Sprint Nextel. Cox’s decision was based upon the lack of wireless scale necessary to compete in the marketplace, the acceleration of competitive 4G networks in Cox’s territories where it was limited by its MVNO agreement to providing 3G services, and the cost and complexities associated with obtaining access to wireless devices most attractive to consumers.²

¹ 47 C.F.R. § 27.14(l); *see also Service Rules for the 698-746, 747-762 and 777-792 MHz Bands*, Second Report and Order, 22 FCC Rcd 15289 (2007).

² *See Cox Communications, Inc., Cox Communications to Discontinue Cox Wireless Service, Effective March 30, 2012*, Press Release (Nov. 15, 2011), *available at* <http://cox.mediaroom.com/index.php?s=43&item=569>. Although Cox only is required to report on matters as of June 13, 2011 that concern the Cox 700 MHz Licenses, Cox believes it is important to keep the Commission apprised of other more recent developments relating to the company’s wireless business plans. In addition, Cox recently announced that it has entered into an agreement to sell 20 MHz of Advanced Wireless Services spectrum to Verizon Wireless. Cox and Verizon Wireless also announced that via separate agreements they will become agents to sell each other’s residential and commercial products and services through their respective sales channels, and that Cox expects to enter into arrangements with the innovation technology joint venture formed by Verizon Wireless, Comcast, Time Warner Cable and Bright House Networks to better integrate wireline and wireless products and services. *See Cox Communications, Inc., Cox Communications Announces Agreement to Sell Advanced Wireless Spectrum to Verizon Wireless*, Press Release (Dec. 16, 2011), *available at* <http://cox.mediaroom.com/index.php?s=43&item=576>. *See also Applications of Cox TMI Wireless, LLC, Assignor, and Celco Partnership d/b/a Verizon Wireless, Assignee, for Consent to the Assignment of Commission*

Cox had envisioned the Cox 700 MHz Licenses as a vehicle for complementing its wireless service. Developing the 700 MHz band, however, has been significantly more difficult for many licensees than either the Commission or the wireless industry anticipated. Those difficulties have been discussed at length in the record,³ as well as at the April 26, 2011 workshop held by the Wireless Telecommunications Bureau regarding the interoperability of devices across the 700 MHz band.⁴ Among other things, interference issues, the development of appropriate technical standards and equipment availability have made this process very challenging.

Cox has been diligently addressing the issues that have frustrated the deployment of service over the Cox 700 MHz Licenses. For example:

- Cox has been a principal leader in a consortium of smaller wireless service providers that was created following Auction No. 73 to address 700 MHz spectrum, equipment and policy issues. In fact, the work done by Cox and the consortium facilitated the development and modification of the Third Generation Partnership Project (“3GPP”) standards for Long Term Evolution (“LTE”) for Band Class 12 operations.
- Cox has conducted testing of an LTE solution for its 700 MHz spectrum, although it has not committed to deployment of LTE or any other technology. The testing has been crucial to identify and work towards resolving interference and other technical issues associated with the Cox 700 MHz Licenses.
- Cox has worked closely with vendors regarding the development of suitable equipment for the 700 MHz band, including consumer devices that can provide customers with access to mobile broadband services.
- Cox has worked on other network and related elements that are key to a mobile business, such as the provisioning of back-office support, marketing, and other support mechanisms.

Licenses and Authorizations Pursuant to Section 310(d) of the Communications Act, Exhibit 1, at 2-3, 18-20, File No. 0004996680 (filed Dec. 21, 2011).

³ See, e.g., Comments of Cox Wireless, RM-11592 (Mar. 31, 2010); Letter from Michele C. Farquhar, Counsel to Vulcan Wireless LLC, to Marlene Dortch, FCC, RM-11592; WT Docket No. 11-18 (June 17, 2011); Comments of Rural Cellular Corporation, RM-11626, RM-11592 (Apr. 27, 2011); Reply Comments of King Street Wireless, L.P., RM-11626 (May 12, 2011) Reply Comments of CTIA – The Wireless Association, RM-11626 (May 12, 2011).

⁴ See *Federal Communications Commission Announces Agenda for Workshop on the Interoperability of Customer Mobile Equipment Across Commercial Spectrum Blocks in the 700 MHz Band*, Public Notice, 26 FCC Rcd 6075 (2011). A video of the Interoperability Workshop, and related presentations and related FCC releases, are available at <http://www.fcc.gov/events/700-mhz-interoperability-workshop>.

While Cox has made substantial investments in developing mobility offerings for its customers over the past few years, it has not begun construction of a network for the Cox 700 MHz Licenses. Cox is not providing any service over its 700 MHz spectrum and continues to assess options for the Cox 700 MHz Licenses.

Respectfully submitted,

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EXHIBIT A

Market Number	Block	Market Name	Call Sign	Grant Date	Planned Technology	Planned Services
BEA020	A	Norfolk-Virginia Beach-Newport News, VA-NC	WQIZ534	06/26/2008	Under Evaluation	Under Evaluation
BEA038	A	Macon, GA	WQIZ535	06/26/2008	Under Evaluation	Under Evaluation
BEA081	A	Pensacola, FL	WQIZ536	06/26/2008	Under Evaluation	Under Evaluation
BEA083	A	New Orleans, LA-MS	WQIZ537	06/26/2008	Under Evaluation	Under Evaluation
BEA084	A	Baton Rouge, LA-MS	WQIZ538	06/26/2008	Under Evaluation	Under Evaluation
BEA092	A	Fayetteville-Springdale-Rogers, AR-MO-OK	WQIZ539	06/26/2008	Under Evaluation	Under Evaluation
BEA118	A	Omaha, NE-IA-MO	WQIZ540	06/26/2008	Under Evaluation	Under Evaluation
BEA122	A	Wichita, KS-OK	WQIZ541	06/26/2008	Under Evaluation	Under Evaluation
BEA123	A	Topeka, KS	WQIZ542	06/26/2008	Under Evaluation	Under Evaluation
BEA124	A	Tulsa, OK-KS	WQIZ543	06/26/2008	Under Evaluation	Under Evaluation
BEA153	A	Las Vegas, NV-AZ-UT	WQIZ544	06/26/2008	Under Evaluation	Under Evaluation
BEA158	A	Phoenix-Mesa, AZ-NM	WQIZ545	06/26/2008	Under Evaluation	Under Evaluation
BEA159	A	Tucson, AZ	WQIZ546	06/26/2008	Under Evaluation	Under Evaluation
BEA161	A	San Diego, CA	WQIZ547	06/26/2008	Under Evaluation	Under Evaluation
CMA157	B	Roanoke, VA	WQIZ548	06/26/2008	Under Evaluation	Under Evaluation
CMA165	B	Fort Smith AR-OK	WQIZ549	06/26/2008	Under Evaluation	Under Evaluation
CMA174	B	Lafayette, LA	WQIZ550	06/26/2008	Under Evaluation	Under Evaluation
CMA192	B	Gainesville, FL	WQIZ551	06/26/2008	Under Evaluation	Under Evaluation

Market Number	Block	Market Name	Call Sign	Grant Date	Planned Technology	Planned Services
CMA245	B	Ocala, FL	WQIZ552	06/26/2008	Under Evaluation	Under Evaluation
CMA324	B	Arkansas 1 - Madison	WQIZ553	06/26/2008	Under Evaluation	Under Evaluation
CMA459	B	Louisiana 6 - Iberville	WQIZ554	06/26/2008	Under Evaluation	Under Evaluation
CMA692	B	Virginia 12 - Caroline	WQIZ555	06/26/2008	Under Evaluation	Under Evaluation