



of customers is treated within the Company as confidential, proprietary and competitively sensitive information. This information is not made available to the public and Cox has no intention to provide this information to the public. Information of this type is not disclosed to individuals other than Cox personnel.

6. Within the Company, only those individuals with a need to know this subscriber-related information are provided with this information.
7. The Company strictly maintains the confidentiality of this information and designates it as confidential.
8. Detailed internal records of subscriber service tier counts is of unique value to Cox in forming its service-related strategies and is related to Company financial planning. Annual inward movement of subscribers also is regarded as financial information. This information has unique value to Cox. The information cannot be readily duplicated by third parties. In the case of inward movement of customers, beginning and end of year subscriber counts, which are public, do not disclose the inward movement input. Disclosure of inward movement input also would effectively disclose annual outward movement.
9. Public disclosure of the requested information would result in substantial harm to the competitive position of the Company and provide substantial benefits to its competitors.
10. Public disclosure of the requested information would enable competitors to gain detailed information about the Company's current customers by their specific service tiers. In addition, public disclosure also would aid competitors

in their marketing of video products targeted at specific Cox service tiers. The effective disclosure of inward and outward subscriber movement by year would also unduly benefit competitors in designing market strategy.

11. Given the ongoing need for confidential treatment of the requested information, it is my good faith belief that this information, provided to the Department under seal, should remain confidential on an ongoing basis until such time as Cox deems that such confidential treatment is no longer necessary. Should the Department grant confidential treatment, the Company would want an opportunity to request an extension of the initial period of confidential treatment.
12. I have reviewed the information provided to the Department under seal and do not believe that any portion of this information can be released publicly without substantial harm to Cox.

Signed under the pains and penalties of perjury on this 30 day of October, 2014.

A handwritten signature in black ink, appearing to read "Robert J. Howley", is written over a horizontal line.

Robert J. Howley