U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156
WMDVLGBT	BE Annual Report/Annual Plan - Table o	f Contents

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U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.1
Description of WMDVL	GBTBE Program Activities During the	evious Calendar Year

Pursuant to General Order 156, U.S. TelePacific Corp., Mpower Communications Corp., Arrival Communications, Inc. and DSCI LLC, all d/b/a TPx Communications ("TPx"), continues to enhance its WMDVLGBTBE Program by taking steps to improve its diverse sourcing program and spend.

- TPx enhanced its electronic recordkeeping capabilities, most recently by adding a field to its internal financial tracking database to include subcontractors. TPx also updated its Supplier Diversity form to include subcontractor information and is encouraging its existing suppliers who contract with diverse suppliers to report the information to TPx.
- TPx updated its internet site with information related to the Supplier Diversity program (https://www.tpx.com/legal/supplier-diversity/) including a link to the Supplier Clearinghouse.
- TPx improved its website functionalities to include a "fillable" Supplier Diversity form for potential vendors to submit online. Submissions are automatically directed to TPx's Purchasing department.
- TPx updated its purchasing process to require that each party requesting a purchase order search the CPUC supplier database, using simple product terms and geographic location, to determine whether a diverse supplier could be asked for a quote.
 - o If such a supplier can be found and a quote obtained, it must be attached regardless of whether the diverse supplier is selected. Requisitions that do not give diverse suppliers the opportunity to bid are subject to rejection.
 - Personnel within TPx's Finance department who report purchasing information also searches the CPUC supplier database to verify whether an appropriate diverse vendor may exist.
- A Supplier Diversity letter/form is sent to all new suppliers when a W9 is obtained. They are
 also sent annually via email to all current suppliers detailing the Supplier Diversity program,
 including how to get certified, and requesting information regarding any diverse suppliers
 and/or diverse subcontractors.
- TPx continues to train those tasked with seeking vendors to actively and routinely seek out qualified minority-owned, women-owned, disabled veteran-owned and LGBT-owned vendors that can provide products and services to TPx.
- Twice a year, the CPUC conducts small business expos throughout the state to promote procurement opportunities and to provide a platform for networking with other businesses. TPx attended both expos in 2018, participating for the first time as an exhibitor at the fall event.
- TPx attended the Supplier Diversity En Banc in 2018.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.2
W	MDVLGBTBE Annual Results by Ethnicity	/

		r		2018		
		Ī	Direct	Sub	Total \$	%
1		Asian Pacific American	\$755,555	\$0	\$755,555	1.35%
2	Min a nite.	African American	\$24,644	\$0	\$24,644	0.04%
3	Minority Male	Hispanic American	\$0	\$0	\$0	0.00%
4	wate	Native American	\$0	\$0	\$0	0.00%
5		Total Minority Male	\$780,199	\$0	\$780,199	1.39%
6		Asian Pacific American	\$0	\$0	\$0	0.00%
7		African American	\$0	\$0	\$0	0.00%
8	Minority Female	Hispanic American	\$8,212	\$0	\$8,212	0.01%
9	remale	Native American	\$0	\$0	\$0	0.00%
10		Total Minority Female	\$8,212	\$0	\$8,212	0.01%
				•	•	
11	Total Mir	nority Business Enterprise (MBE)	\$788,410	\$0	\$788,410	1.41%
			•	•	•	
12	Wome	en Business Enterprise (WBE)	\$629,006	\$0	\$629,006	1.12%
	Lesbia	an, Gay, Bisexual, Transgender	\$0	\$0	\$0	0.00%
13	Bus	siness Enterprise (LGBTBE)	ΨΟ	ΨΟ	ΨΟ	0.0070
	D	isabled Veteran Business	\$0	\$0	\$0	0.00%
14		Enterprise (DVBE)	**		***	0.0070
15		Other 8(a)*	\$0	\$0	\$0	0.00%
13		Outer o(a)	\$0	Ψ0	ΨΟ	0.0070
16		TOTAL WMDVLGBTBE	\$1,417,416	\$0	\$1,417,416	2.53%
17	Net Procur	rement** \$56,031,471				

NOTE: "FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE

** NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS Direct - DIRECT PROCUREMENT

Seb - SUBCONTRACTOR PROCUREMENT

2 - PERCENTAGE OF NET PROCUREMENT

Note: *TPx captures its procurement spend on a national level. Many of its vendors for network equipment are provided on a national basis. TPx does not capture the spend on a state basis which skews its performance under the California program.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.2
WMDVLGBTBE	Direct Procurement by Product and Serv	ice Categories

			Γ	Product	S	Service	es	Total	
				\$	%	\$	%	\$	%
1		Asian Pacific American	Direct	\$755,555	3.18%	\$0	0.00%	\$755,555	1.35%
2		African American	Direct	\$0	0.00%	\$24,644	0.08%	\$24,644	0.04%
3	Minority Male	Hispanic American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
4	wate	Native American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
5		Total Minority Male	Direct	\$755,555	3.18%	\$24,644	0.08%	\$780,199	1.39%
6		Asian Pacific American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
7	Minorita	African American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
8	Minority Female	Hispanic American	Direct	\$0	0.00%	\$8,212	0.03%	\$8,212	0.01%
9	Telliale	Native American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
10		Total Minority Female	Direct	\$0	0.00%	\$8,212	0.03%	\$8,212	0.01%
11	Total Min	ority Business Enterprise (MBE)	Direct	\$755,555	3.18%	\$32,856	0.10%	\$788,410	1.41%
		, , ,		- ,		, ,		,	
12	Wome	n Business Enterprise (WBE)	Direct	\$320,564	1.35%	\$308,442	0.96%	\$629,006	1.12%
13		n, Gay, Bisexual, Transgender iness Enterprise (LGBTBE)	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
14	Disable	d Veteran Business Enterprise (DVBE)	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
		(5452)	Direct						
15		Other 8(a)*	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
16	-	TOTAL WMDVLGBTBE	Direct	\$1,076,119	4.53%	\$341,297	1.06%	\$1,417,416	2.53%
			7						
	Total Prod Procurem		14						
1	Total Serv	ice							
18 I	Procurem	ent \$32,276,1	57						
19 I	Net Procu	rement** \$56,031,4	71						
	Total Num	ber of	¬						
	WMDVLG								
			15						

HOTE: "FIRMS CLASSIFIED AS ‡(*) OF SMALL BUSINESS ADMINISTRATION INCLUDES HON-WMDTLGBTBE
""HET PROCUREMENT INCLUDES PURCHASE ORDER, HON-PURCHASE ORDER, AND CREDIT CARD DOLLARS
Dir*ect - DIRECT PROCUREMENT
S=b - SUBCONTRACTOR PROCUREMENT

Sab - SUBCONTRACTOR PROCUREMENT × - PERCENTAGE OF NET PROCUREMENT

Note: Gross and net procurement are based on TPx's direct spend only (less employee, utility, carriers, rent and tax spend). The percentage calculation is derived from direct spend/net procurement.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.2
WMDVLGBTBE Subo	contractor Procurement by Product and	Service Categories

TPx recently enhanced its electronic recordkeeping capabilities by adding a field to its internal financial tracking database to include subcontractors, however has none to report at this time.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.2
WMDVLGBT	BE Procurement by Standard Industrial	Categories

Asian Pacific American African American Italian Pacific American Ital	emale Male Female # 1000%	icaNative American		Bisexual, Transgender	Disabled Veterans			
Asian Pacific American Category	ican lispanic Ameremale Male Fem	icaNative Americar						
Asian Pacific American Stan Pacific American Sta	ican lispanic Ameremale Male Fem	icaNative Americar						
Asian Pacific American	emale Male Fem	icaNative Americar	Business Business					
Category Male Female Female<			Enterprise Enterprise		Enterprise Other St. 1	8(-)	Total	Total
## ## ## ## ## ## ## ## ## ## ## ## ##	000	ale Male Female	(MBE) (WBE)	(LGBTBE)	(DVBE)		/MDVLGBTBI	Dollars
ance/Facilities	00	0\$	\$0 \$11,	\$11,416			\$11,416	\$7,187,110
nance/Facilities		0.00%	0.00%	0.02%			0.02%	
\$755,555 17. 18. 0.000			\$0 \$103,019	013	0\$		\$103,019	\$2,992,750
**************************************			.00	0.18%	700.0		0.18%	
X			\$780,199 \$338,239	239			\$1,118,438	\$23,755,314
# X # X # X # X #			7.	7.1			22.	
N		\$0	0\$	\$0			\$0	\$2,254,746
00 × 00 × 00 × 00		7.0	70	7.0			7.0	
00 00 00 00 00 00 00 00			\$45,741	,741			\$45,741	\$5,600,806
* X * X *			0.0 %	0.08%			70	
N # N #	\$8	\$8,212	\$8,212 \$130,591	,591			\$138,802	\$14,240,745
69 X 49)'0	0.01%	0.01% 0.2	0.23%			70	
X 49								
**								
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×								
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×								
\$ \$755.555 \$0 \$24.644 \$0	\$0 \$0 \$8.212	0#	\$0 \$788.410 \$629.006	0\$ 900	0#	0#	\$1,417,416	\$56.031.471
1.35% 0.00% 0.04% 0.00%	0.00%	0.00% 0.00	1.41%	0.0	0.0	0.00%	2.53%	100.00%

Total Product Procurement	\$23,755,314
Total Service Procurement	\$32,276,157
Net Procurement"	\$56 031 471

Net Procurement*** \$56,031,471
NOTE: FIRMS WITH MULIT MINORITY OWNERSHIP STATUS

"FIRMS CLASSIFIED AS 8(4) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE"
""NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS
TOTAL DOLLARS - TOTAL PROCUREMENT DOLLAR AMOUNT IN THE SPECIFIC SIC CATEGORY
2 - PERCENTAGE OF TOTAL DOLLARS

U.S. TelePacific Corp, dba
TPx Communications

2018

G.O. #156 Sec. 9.1.2

Description of WMDVLGBTBEs with CA Majority Workforce

Per G.O. #156 Sec. 9.1.2, each utility shall report the number of WMDVLGBTBEs who have the majority workforce in California to the extent such information is readily accessible. This information is not readily accessible.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.3
	WMDVLGBTBE Program Expenses	

As TPx is using internal resources to set up and expand its Program, expenses for 2018 predominantly involve time of personnel in Regulatory and Finance for activities such as evaluating and modifying prior processes to identify and track covered expenditures, identifying and tracking certified WMDVLGBTBE entities with which TPx does business, identifying and modifying systems for tracking and reporting purposes, preparation of internal and external notices, time for searches using the CPUC diverse supplier database, responding to inquiries, and the development and preparation of reports and documentation.

Expense Category	2018 (Actual)
Wages	\$0
Other Employee Expenses	\$0
Program Expenses	\$0
Reporting Expenses	\$0
Training	\$0
Consultants	\$0
Other	\$0
TOTAL	\$0

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.4						
Description of Progress in Meeting or Exceeding Set Goals								

TPx did not meet its voluntary target goals in 2018. TPx believes that a portion of its suppliers are certified with agencies on a national level with organizations such as the National Minority Supplier Development Council (NMSDC) or the Women's Business Enterprise National Council (WBENC), however are not registered with the California Supplier Clearinghouse. As an example, TPx contracts with a women-owned supplier who is certified with WBENC, but is not certified with the California Supplier Clearinghouse. If TPx could include the spend on this supplier based on their national certification, TPx's spend percentage in the WBE category would be 2.61% instead of the current 1.12%, bringing TPx's total diverse spend to 4.02% instead of 2.53%.

Suppliers who are certified by "comparable" agencies or who do not wish to register, highlight one of the issues with relying solely upon Supplier Clearinghouse numbers to measure a company's performance. TPx has been told by some suppliers that the certification process has become cumbersome and requires confidential information than the supplier is comfortable with providing. Suppliers have said that in the past, the Supplier Clearinghouse offered a condensed application for those with WMDVLGBTBE certificates, so the process was simpler and less invasive.

TPx endeavors to improve upon its subcontracting reporting. The company recognizes the importance of tracking this spend and developing WMDVLGBTBE business through its prime contractors. Now that TPx has updated its financial system reporting capabilities, TPx will work with its large, high spend suppliers to identify, tracks and report diverse spend at the subcontractor level.

TPx continues to develop both internal and external communications and/or procedures targeting increased opportunity for diverse suppliers and specifically, reaches out to the vendors by phone and via email to make sure they are aware of the certification process and the importance of becoming certificated with the Supplier Clearinghouse.

TPx regularly focuses on reducing expenses and providing the best value to our customers while ensuring increased spend with diverse suppliers when possible.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.5
	WMDVLGBTBE Results and Goals	

Category	2018 Results	2018 Goals
Minority Men	1.39%	2.00%
Minority Women	0.01%	1.00%
Minority Business Enterprise (MBE)	1.41%	3.00%
Women Business Enterprise (WBE)	1.12%	3.00%
Lesbian, Gay, Bisexual, Transgender Business		
Enterprise (LGBTBE)	0.00%	0.00%
Disabled Veteran Business (DVBE)	0.00%	0.25%
TOTAL WMDVLGBTBE	2.53%	6.25%

% - PERCENTAGE OF NET PROCUREMENT

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.5						
Description of Prime Contractor Utilization of WMDVLGBTBE Subcontractors								

TPx sends notices to all its suppliers seeking information on diverse subcontracting. TPx provides a notice regarding WMDVLGBTBE subcontracting with each Purchase Order.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.5							
Summary of Prime Contractor Utilization of WMDVLGBTBE Subcontractors									

TPx enhanced its electronic recordkeeping capabilities, most recently by adding a field to its internal financial tracking database to include subcontractor information, however has none to report at this time.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.6						
A List of WMDVLGBTBE Complaints Received and Current Status								

TPx is not aware of any WMDVLGBTBE complaints.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.7							
Description of Efforts to Recruit WMDVLGBTBE Suppliers in Low Utilization Categories									

To identify diverse suppliers in areas of low utilization, TPx has searched for WMDVLGBTBEs within the low utilization categories to make contact and develop relationships that may lead to procurement opportunities. TPx has worked with WMDVLGBTBEs that are not certified with the Supplier Clearinghouse to complete the necessary documentation to become certified.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 9.1.11
	WMDVLGBTBE Fuel Procurement	

Not applicable.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 10.1.1							
WMDVLGBTBE Annual SHORT, MID, AND LONG-TERM Goals by Product and Service Category									

While economic factors and influences outside the company's control affect overall purchasing decisions, TPx will seek opportunities to improve upon stated goals and the resulting accomplishments year over year.

			2019			Mid-Term 2022					Long-Term 2024				
	Minority Business Enterprise (MBE)	₩omen Business Enterprise (₩BE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	₩MDVLGBT BE	Minority Business Enterprise (MBE)	₩omen Business Enterprise (₩BE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	VM DVLGBTBE	Minority Business Enterprise (MBE)	₩omen Business Enterprise (₩BE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	₩ MDVLGBTBE
Products															
CAPEX	1.50%	1.50%	0.05%	0.10%	3.15%	3.75%	1.75%	0.15%	0.15%	5.80%	7.50%	2.50%	0.05%	0.75%	10.80%
_															·
Subtotal	1.50%	1.50%	0.05%	0.10%	3.15%	3.75%	1.75%	0.15%	0.15%	5.80%	7.50%	2.50%	0.05%	0.75%	10.80%

Services	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBT BE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	VM DVLGBTBE
Accounts															
Payable	0.25%	0.25%	0.00%	0.00%	0.50%	0.63%	0.37%	0.00%	0.00%	1.00%	1.25%	0.50%	0.00%	0.00%	1.75%
Building Maintenance	0.25%	0.25%	0.00%	0.05%	0.55%	0.63%	0.37%	0.00%	0.15%	1.15%	1.25%	0.50%	0.00%	0.25%	2.00%
Legal Services	0.25%	0.25%	0.00%	0.00%	0.50%	0.63%	0.37%	0.00%	0.00%	1.00%	1.25%	0.30%	0.00%	0.00%	1.55%
Network	0.50%	0.50%	0.00%	0.05%	1.05%	1.25%	0.75%	0.00%	0.15%	2.15%	2.50%	1.00%	0.00%	0.25%	3.75%
Temp Angencies <i>l</i> Consultants	0.25%	0.25%	0.00%	0.05%	0.55%	0.63%	0.37%	0.05%	0.10%	1.15%	1.25%	0.20%	0.00%	0.25%	1.70%
Subtotal	1.50%	1.50%	0.00%	0.15%	3.15%	3.77%	2.23%	0.05%	0.40%	6.45%	7.50%	2.50%	0.00%	0.75%	10.75%
TOTAL	3.00%	3.00%	0.05%	0.25%	6.30%	7.52%	3.98%	0.20%	0.55%	12.25%	15.00%	5.00%	0.05%	1.50%	21.55%

*The stated goals are not legally enforceable requirements or quotas of any kind and failure to meet or exceed them, or any other portion of this plan, is not subject to any penalty.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 10.1.2
Description of WMDVLGBTBE Planned Program Activities for the Next Calendar Year		

TPx continues to improve processes for obtaining WMDVLGBTBE information and for working with contractors to encourage WMDVLGBTBE subcontracting and to obtain information regarding their success.

In 2019, TPx will continue to maintain and update its employees' awareness of WMDVLGBTBEs opportunities and methods to identify new WMDVLGBTBE suppliers through training and improved resources. TPx is focused on expanding its successes, improving any weaknesses, and making sure that those individuals who are in a position to make purchasing decisions understand and follow through on TPx's commitment to supplier diversity.

Now that TPx has updated its financial system reporting capabilities, TPx will work with its large, high spend suppliers to identify, track and report diverse spend at the subcontractor level.

TPx will work to establish partnerships with local Small Business Administrations and Ethnic Chambers to identify additional opportunities for expanding its local spending and community participation in local events, as applicable. TPx will participate in small business expos conducted by the CPUC as well as the Annual GO 156 Supplier Diversity En Banc.

TPx's Compliance team will continue to meet with TPx corporate directors and managers with purchasing responsibility to describe the high level requirements of GO 156 and will engage the team for ideas and recommendations for increasing our supply of diverse vendors.

TPx endeavors to hold quarterly meetings with internal organizations responsible for Supplier Diversity and those employees making purchasing decisions. Discussions will include best practices and action plans.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 10.1.3	
Plans for Recruiting WMDVLGBTBE Suppliers in Low Utilization Areas			

TPx continues to encourage potential uncertified WMDVLGBTBEs to apply for and maintain certification with the Clearinghouse by providing a notice regarding WMDVLGBTBE to go out with each Purchase Order. TPx plans to work with other utilities to share ideas on how to identify and lobby new WMDVLGBTBE vendors in low utilization areas.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 10.1.4		
Plans for Recruiting WMDVLGBTBE Suppliers Where Unavailable				

TPx continues to seek opportunities for the purchase of products and services and will encourage its management team to expand opportunities for WMDVLGBTBE vendors in categories for which they are available. TPx will improve contact with WMDVLGBTBE organizations and agencies within the community by attending business expos and networking with other utilities to further promote the program.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 10.1.5	
Plans for Encouraging Prime Contractors to Subcontract WMDVLGBTBE Suppliers			

TPx encourages its prime contractors to identify, solicit, qualify and negotiate with prospective DBE subcontractors.

TPx is committed to providing increased opportunities for diverse businesses, but in some cases, the company is challenged by supply chain realities that may impede the ability to buy directly from WMDVLGBTBE suppliers. In those cases, TPx will rely upon its prime contractors' subcontracting activities to expand supplier diversity efforts.

The award of subcontracts are at the sole discretion of the prime contractor.

U.S. TelePacific Corp, dba TPx Communications	2018	G.O. #156 Sec. 10.1.6	
Plans for Complying with WMDVLGBTBE Program Guidelines			

TPx is utilizing the California Public Utilities Commission website and following established guidelines for the Supplier Diversity program. TPx will continue to monitor any changes to the program guidelines to ensure continued compliance.

Annual Energy Product Results by Ethnicity and WMDVLGBTBE Certification Not applicable.

Annual Power Product Results by Ethnicity and WMDVLGBTBE Certification Not applicable.