

U.S. TelePacific Corp, dba TPx Communications	2019	G.O. #156
WMDVLGBTBE Annual Report/Annual Plan - Table of Contents		

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U.S. TelePacific Corp, dba TPx Communications	2019	G.O. #156 Sec. 9.1.1
Description of WMDVLGBTBE Program Activities During the Previous 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 provides information on its internet site related to the Supplier Diversity program (<https://www.tpx.com/legal/supplier-diversity/>) including a link to the Supplier Clearinghouse and 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.
 - 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 and again 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 LGBTQ-owned vendors that can provide products and services to TPx.
- TPx reached out to the U.S. Veteran’s Business Alliance (Sacramento) and the Los Angeles Gay and Lesbian Chamber of Commerce. TPx signed up for updates on events and has shared information with decision makers on networking opportunities.
- 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 the spring Small Business expo in 2019.
- TPx attended the Supplier Diversity En Banc in 2019.
- TPx regularly reaches out to its top suppliers to inquire about and encourage certification.
- TPx contracted with its first LGBTQ certified supplier in 2019, spending \$26,200.00.

U.S. TelePacific Corp, dba TPx Communications	2019	G.O. #156 Sec. 9.1.2
WMDVLGBTBE Annual Results by Ethnicity		

		2019				
		Direct	Sub	Total \$	%	
1	Minority Male	Asian Pacific American	\$687,070	\$0	\$687,070	0.98%
2		African American	\$0	\$0	\$0	0.00%
3		Hispanic American	\$0	\$0	\$0	0.00%
4		Native American	\$0	\$0	\$0	0.00%
5		Total Minority Male	\$687,070	\$0	\$687,070	0.98%
6	Minority Female	Asian Pacific American	\$0	\$0	\$0	0.00%
7		African American	\$0	\$0	\$0	0.00%
8		Hispanic American	\$2,771	\$0	\$2,771	0.00%
9		Native American	\$0	\$0	\$0	0.00%
10		Total Minority Female	\$2,771	\$0	\$2,771	0.00%
11	Total Minority Business Enterprise (MBE)		\$689,840	\$0	\$689,840	0.99%
12	Women Business Enterprise (WBE)		\$321,181	\$0	\$321,181	0.46%
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		\$26,200	\$0	\$26,200	0.04%
14	Disabled Veteran Business Enterprise (DVBE)		\$0	\$0	\$0	0.00%
15	Other 8(a)*		\$0	\$0	\$0	0.00%
16	TOTAL WMDVLGBTBE		\$1,037,222	\$0	\$1,037,222	1.49%
17	Net Procurement**		\$69,782,523			

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
Sub - SUBCONTRACTOR PROCUREMENT
% - 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	2019	G.O. #156 Sec. 9.1.2
WMDVLGBTBE Direct Procurement by Product and Service Categories		

			Products		Services		Total		
			\$	%	\$	%	\$	%	
1	Minority Male	Asian Pacific American	Direct	\$622,070	2.11%	\$65,000	0.16%	\$687,070	0.98%
2		African American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
3		Hispanic American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
4		Native American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
5		Total Minority Male	Direct	\$622,070	2.11%	\$65,000	0.16%	\$687,070	0.98%
6	Minority Female	Asian Pacific American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
7		African American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
8		Hispanic American	Direct	\$0	0.00%	\$2,771	0.01%	\$2,771	0.00%
9		Native American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
10		Total Minority Female	Direct	\$0	0.00%	\$2,771	0.01%	\$2,771	0.00%
11	Total Minority Business Enterprise (MBE)	Direct	\$622,070	2.11%	\$67,771	0.17%	\$689,840	0.99%	
12	Women Business Enterprise (WBE)	Direct	\$162,288	0.55%	\$158,893	0.39%	\$321,181	0.46%	
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Direct	\$0	0.00%	\$26,200	0.06%	\$26,200	0.04%	
14	Disabled Veteran Business Enterprise (DVBE)	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%	
15	Other 8(a)*	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%	
16	TOTAL WMDVLGBTBE	Direct	\$784,358	2.66%	\$252,864	0.63%	\$1,037,222	1.49%	
17	Total Product Procurement			\$29,458,243					
18	Total Service Procurement			\$40,324,281					
19	Net Procurement**			\$69,782,523					
20	Total Number of WMDVLGBTBEs Received Direct Spe							14	

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
 Sub - 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	2019	G.O. #156 Sec. 9.1.2
WMDVLGBTBE Subcontractor Procurement by Product and Service Categories		

TPx enhanced its electronic recordkeeping capabilities by adding a field to its internal financial tracking database to include subcontractors, however, has none to report for 2019.

U.S. TelePacific Corp, dba TPx Communications	2019	G.O. #156 Sec. 9.1.2
WMDVLGBTBE Procurement by Standard Industrial Categories		

SIC Category	Asian Pacific American		African American		Hispanic American		Native American		Minority Business Enterprise (MBE)		Women Business Enterprise (WBE)		Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		Disabled Veterans Business Enterprise (DVBE)		Other 8(a)**		Total Dollars
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	
Accounts Payable	\$	\$0	0.00%		\$0	0.00%			\$0	0.00%	\$3,808	0.01%					\$3,808	0.01%	\$6,332,451
Building Maintenance/Facilities	\$								\$0	0.00%	\$73,783	0.11%			\$0	0.00%	\$73,783	0.11%	\$2,790,736
Capex	\$	\$622,070	1%						\$622,070	0.99%	\$162,268	0.24%	\$10,200	0%			\$794,558	1%	\$29,458,243
Legal	\$				\$0	0%			\$0	0%	\$0	0%					\$0	0%	\$7,142,247
Maintenance	\$				\$57,106	0%			\$57,106	0.08%	\$0	0%					\$57,106	0%	\$6,349,177
Temp Agencies/Consultants	\$	\$65,000	0.09%		\$2,771	0.00%			\$67,771	0.10%	\$24,397	0.03%	\$16,000	0.02%			\$108,167	0%	\$17,709,669
	\$																		
	\$																		
	\$																		
	\$																		
	\$																		
	\$																		
TOTAL	\$	\$687,070	0.98%	\$0	\$0	\$0	\$59,876	\$0	\$0	\$746,946	\$264,075	\$26,200	\$0	\$0	\$1,037,222	\$69,782,523	1.40%	100.00%	

Total Product Procurement \$29,458,243
 Total Service Procurement \$40,324,281

Net Procurement*** \$69,782,523

NOTE: FIRMS WITH MULTIPLE MINORITY OWNERSHIP STATUS
 **FIRMS CLASSIFIED AS 8(a) 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
 % - PERCENTAGE OF TOTAL DOLLARS

U.S. TelePacific Corp, dba TPx Communications	2019	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. TPx does not receive workforce data of its vendors, therefore does not have data responsive to this section.

U.S. TelePacific Corp, dba TPx Communications	2019	G.O. #156 Sec. 9.1.3
WMDVLGBTBE Program Expenses		

As TPx uses internal resources for the program, expenses for 2019 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	2019 (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	2019	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 2019. A portion of TPx's 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 1.17% instead of the current 0.46%, bringing TPx's total diverse spend to 2.19% instead of 1.49%.

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 which the supplier is not 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.

Three of TPx's diverse suppliers lost their certification in 2019. Upon inquiry, TPx learned the businesses had changed ownership and no longer qualified for certification with the Supplier Clearinghouse.

TPx recognizes the importance of tracking subcontractor spend and developing WMDVLGBTBE business through its prime contractors. Although TPx updated its financial system reporting capabilities, TPx depends on high spend suppliers to identify, track and report diverse spend at the subcontractor level. TPx's suppliers have not reported this information.

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 benefits to becoming certificated with the Supplier Clearinghouse.

On February 12, 2020, TPx announced the completion of its acquisition by affiliates of Siris Capital Group, LLC ("Siris"), a leading private equity firm focused on investing and driving value creation in technology and telecommunications companies. Siris supports TPx's supplier diversity mission to proactively identify, build relationships with, and purchase goods and services from certified small businesses as well as enterprises owned by minorities, women, veterans, members of the LGBTQ community, and disabled persons that can help TPx achieve its corporate objectives.

TPx continues to focus 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	2019	G.O. #156 Sec. 9.1.4
WMDVLGBTBE Results and Goals		

Category	2019 Results	2019 Goals
Minority Men	0.98%	2.00%
Minority Women	0.00%	1.00%
Minority Business Enterprise (MBE)	0.99%	3.00%
Women Business Enterprise (WBE)	0.46%	3.00%
Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	0.04%	0.00%
Disabled Veteran Business (DVBE)	0.00%	0.25%
TOTAL WMDVLGBTBE	1.49%	6.25%

% - PERCENTAGE OF NET PROCUREMENT

U.S. TelePacific Corp, dba TPx Communications	2019	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	2019	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	2019	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	2019	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	2019	G.O. #156 Sec. 9.1.11
WMDVLGBTBE Fuel Procurement		

Not applicable.

U.S. TelePacific Corp, dba TPx Communications	2019	G.O. #156 Sec. 10.1.1
WMDVLGBTBE Annual SHORT, MID, AND LONG-TERM Goals by Product and Service Category*		

	Short-Term 2020					Mid-Term 2023					Long-Term 2025				
	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)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE
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															
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 Agencies/Consultants	0.25%	0.25%	0.00%	0.05%	0.55%	0.63%	0.37%	0.05%	0.00%	1.15%	1.25%	0.20%	0.00%	0.25%	1.70%
						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
						0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Subtotal	1.50%	1.50%	0.00%	0.15%	3.15%	3.77%	2.23%	0.05%	0.30%	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%	0.45%	12.25%	15.00%	5.00%	0.05%	1.50%	21.55%

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.

***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	2019	G.O. #156 Sec. 10.1.2
Description of WMDVLGBTBE Planned Program Activities for the Next Calendar Year		

TPx continues to ensure 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.

TPx continues 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 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	2019	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	2019	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	2019	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.

U.S. TelePacific Corp, dba TPx Communications	2019	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.