



Control Number: 30240



Item Number: 1897

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**WORKFORCE AND SUPPLIER DIVERSITY FORM
COMPANY INITIATIVES**

LEVEL 3 COMMUNICATIONS, LLC

including its subsidiaries,
Broadwing Communications, LLC
WilTel Communications, LLC
and
TelCove Operations, Inc.

HUB- Historically Underutilized Business Report

30240

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Texas Public Utility Commission
Docket Nos. 30240 and 30238
December 29, 2011

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WORKFORCE AND SUPPLIER DIVERSITY FORM COMPANY INITIATIVES

Describe the specific initiatives, programs, and activities undertaken under the plan during the preceding year:

As stated in the Plan, Level 3 is committed to ensuring its continued success through the full and effective utilization of qualified employees and candidates for employment, regardless of race, sexual orientation, marital status, color, national origin, pregnancy, religion, sex, age, mental or physical disability, veteran status, or any other basis upon which the law prohibits discrimination. To that end, the Company has established equal employment practices related to recruiting, hiring, training, compensation, benefits, promotions and transfers.

During the preceding year the Company has taken active steps to improve its policies, procedures, and training for HR staff to ensure full awareness and adoption of said practices. The Company has active representation on the national Recruitment Regulatory Compliance Committee, the National Labor Exchange Operations Committee (partnership with NASWA) and has ongoing initiatives to continually improve its diversity, inclusion, and equal employment practices.

Selected Activities and initiatives during the preceding year:

Company-wide acknowledgement of Code of Ethics – the Company publishes and requires every individual employee-owner to read and acknowledge the Code of Ethics and pledge to uphold this code of conduct by which the Company maintains its diverse, inclusive and safe environment.

Increased access to myHR for employees -- The Company continues to follow the established equal employment practices stated in the Plan relative to recruiting, hiring, training, compensation, benefits, promotions and transfer. The Company actively promotes the open door policy as stated in the Plan. The Company launched a new internal employee-owner site with quick links to our Core Values and manager training on creating and maintaining a professional workplace environment.

Added training for people manager and hiring managers -- Level 3 continues to train its supervisors, managers, and executives on workforce diversity, inclusion, equal employment opportunities, anti-harassment, and screening policies, procedures, and expectations. All training is available via multiple resources, including the *Manager's Toolkit* system, which has been upgraded during the preceding year with additional training resources and making EO and Diversity policies and practices visible on the home screen of the tool. The *Manager's Toolkit* also includes educational materials on appropriate hiring practices. In addition to revising the hiring manager system the Level 3 HR and Legal teams provided in-person and individual compliance and diversity training to multiple facilities throughout the preceding year. As stated in the Plan, individual coaching would be offered upon request and is ongoing in addition to the group led trainings. The Company also authored and released an article on its intranet educating employees on cultural awareness in the workplace.

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Broadened Workforce Diversity Recruiting Efforts – the Company's recruitment focus continues to be on developing relationships with key minority organizations to attract high performing candidates for employment. During the preceding year the Company was an active member of DirectEmployer's Association with representation on the Recruitment Regulatory Compliance Committee. Through partnership with DirectEmployer's Association, the Company was able to increase visibility and distribution of its employment opportunities via specialized diversity and veteran outreach programs. The Company now distributes its employment opportunities to over 22 diverse and veteran sites. In addition to selected representation on the Recruitment Compliance Committee the company took additional outreach efforts to strengthen relationships with the National Labor Exchange and National Association of State Workforce Agencies. The Company actively supported and participated in numerous career fairs as well as in career days, youth motivation programs and other community programs. The Company also maintains its ongoing partnership with prevalent internet job sites as well as their diversity sub sites.

Throughout the Plan year the Company has maintained its relationships and committee representations above as well as expanded its veteran recruitment efforts. The Company has developed close working relationships with the Employer Partnership of the Armed Forces (EPAF), the Military Spouse Corporate Career Network (MSCCN), Milicruit Virtual Events, and signed its petition of support with the Employer Support of the Guard and Reserve to diversify and grow its veteran employee-owner population.

Equal Employment Initiatives – in the preceding year Level 3 continued its efforts on the Job Description Database project which defines the role, job summary, and essential duties of all titles/jobs within the Company. This project was launched in an effort to further promote equal employment practices in recruitment, hiring, performance management, and compensation. The project is a joint effort between HR, compensation, and People-Managers within the organization to increase transparency in hiring decisions, promotion, and compensation changes – to support Level 3's ongoing efforts as an equal employment opportunity employer. In addition to the Job Description Database project, the Company initiated a Role Mandate project to further define each employee-owners role and expectations to further the equal treatment and management of the workforce.

Ongoing training for HR – During the preceding year the Company held additional training courses for its Recruitment staff on OFCCP Compliance best practices focused on diversity recruitment, non-discriminatory screening practices, and equal employment decision making. The Recruitment staff participated in Diversity Recruiting training during the preceding year to provide additional practices and resources for inclusion of a diverse candidate pool. The Recruitment staff is actively engaged in outreach efforts with diverse and veteran initiatives.

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Make an assessment of the success of each of the specific initiatives, programs, and activities listed above:

In summary, all of the above listed programs have furthered the Company's initiatives as stated in the Plan of continuing to fairly and consistently enforce its Policies regarding equal employment and anti-harassment. Increasing ease of access to the myHR systems provided resources for employee-owners to feel comfortable and have multiple avenue's in which they may express a concern or complaint.

The additional training provided during the preceding year encompassed additional facilities and a broader scope of employee-owners and people managers. The quick links and improvements to the internal systems were effective in training new supervisors, managers, and Directors on EO, diversity, harassment and discrimination policies and practices. Supporting training documents were also placed on the *Manager's Toolkit*. Managers are now able to readily access information and training on management best practices. Feedback has been positive and insightful from the manager population.

In working with DirectEmployer's association and as a member of the Recruitment Regulatory Compliance Committee Level 3 has increased the number of relationships with organizations able to provide a connection with local, diverse, and veteran workforce members. The increased distribution and outreach efforts have led to increased traffic and number of applicants from diverse sources. The Compliance Committee membership has provided the Company with insight to industry best practices in diversity, outreach, inclusion, and veteran hiring practices which are all currently being considered for the upcoming year's initiatives.

The veteran outreach and recruitment partnerships established in the preceding year have directly increased the number of veteran applicants available to the Company and candidates included in the recruitment processes.

Describe the initiatives, programs, and activities the utility will pursue during the next year to increase the diversity of its workforce and contracting opportunities for small and historically underutilized businesses:

As stated in the Plan, it is Level 3's ongoing position to review the status of its workforce and business diversity programs in order to identify additional available resources which it may use to drive ongoing equal opportunity, diversity, and inclusion efforts.

Level 3 plans to continue its relationship with DirectEmployer's Association as well as focus on strengthening its relationships with State Workforce Agencies, diversity recruitment, and veteran recruitment organizations. In addition to additional outreach programs, Level 3 has started a targeted recruitment campaign to include diverse and veteran applicants via company branding, social media, virtual military recruiting events, and targeted recruitment. Level 3's social media presence is a continued focus in the next year which will include increasing its presence on Twitter, LinkedIn, and expanding its presence on Facebook to increase accessibility of its openings to a more diverse

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candidate pool. Through the DirectEmployer's Association partnership, the Company's open positions are now distributed through the Social Jobs portal on Facebook, a joint effort between DirectEmployer's Association, the National Association of State Workforce Agencies and the Department of Labor. The Company will also maintain active representation on the Recruitment Regulatory Compliance Committee and will participate on the National Labor Exchange Operations Committee as an industry partner with the National Association of State Workforce Agencies to address national workforce planning topics.

The Company will also continue the individual and group training sessions on at least the following: diversity; harassment prevention; discrimination, ethics; and equal employment compliance. These programs will be presented and made available to people managers, recruiters and non-management employees. The Company will continue to update the *Manager's Toolkit* resource for correct and up-to-date training as an added resource for employee-owners.

2012 will also see the introduction of training specifically targeted at the Company's recruiters. The training will focus on raising recruiters' awareness of the benefits of achieving diversity in the workplace. The Company will develop resources to raise awareness of, and outreach to, disabled candidates for inclusion into the selection pool. The Company will also review all job posting practices to ensure adherence to equal employment and consideration of disabled and other diverse applicants.

State the specific progress made under the plan filed by the utility:

During the preceding year the Company set forth initiatives to further its stance in each of the 4 areas outlined in the Plan as filed with the PUC. The Company has continued the plan to maintain an environment that is free from all forms of discrimination and conduct which the Company considers unlawfully harassing or coercive. The open door policy and access to myHR resources was made easier for employee-owners who may have a Complaint. Ongoing individual, online, and group training sessions were held by Level 3 HR and Legal to ensure managers, supervisors, and leaders are aware of, understand, and agree to comply with Level 3's policies concerning diversity, screening, equal employment opportunities and anti-harassment. The Company also added additional partnerships and resources to its workforce diversity recruitment efforts by partnering with DirectEmployer's Association, targeted recruitment campaigns, and ensuring positions were distributed to diverse recruitment job syndication partners such as Diversity.com, Monster Diversity, DiversityWorking.com, and a number of veteran recruitment sites. During the preceding year the Company established a number of direct relationships with veteran recruitment resources such as the Employer Partnership of the Armed Forces and maintains those personal relationships today to further increase access to veteran and active duty military candidate pools. During the preceding year the Company maintained its representation on the Recruitment Regulatory Compliance Committee which will allow ongoing access to industry best practices and tools which the Company may use to further its Diversity initiatives. The Company also gained representation on the National Labor Exchange Operations Committee in partnership

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with the National Association of State Workforce Agencies. And to further its participation in awareness of workforce planning, diversity, inclusion, and equal employment best practices a member of the Company's Recruitment organization was elected to the Board of Directors for Direct Employer's Association. This Board position will allow the Company to stay abreast of changing workforce strategies and to provide input on the partnerships and outreach strategies of Direct Employer's Association that will increase diverse, veteran, military, and recruitment resources for the Company.

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Occupational Categories	NUMBER OF TEXAS FULL-TIME EMPLOYEES FOR REPORTING YEAR													
	Combined Total 2011	Company Totals		Caucasian		African American		Hispanic		Asian		American Indian		
		Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	
Officials and Managers	49	35	14	31	11	2	0	1	2	1	1	0	0	
Professionals	133	89	44	75	34	3	2	5	5	3	3	0	0	
Technicians	92	78	14	50	8	8	3	18	2	0	1	0	0	
Sales Workers	50	32	18	29	12	1	0	1	3	0	2	0	1	
Office and Clerical	10	2	8	1	7	0	0	1	1	0	0	0	0	
Craft Workers (Skilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	
Operatives (Semi-skilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	
Laborers (Unskilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	
Service Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	
Blank	1	1	0		0	0	0	1	0	0	0	0	0	
Previous Year Totals*	183	153	30	127	25	4	1	16	3	5	1	0	0	
Year Totals (As of 12/21/11)	334	236	98	186	72	14	5	26	13	6	7	0	0	

WORKFORCE AND SUPPLIER DIVERSITY FORM **COMPANY INITIATIVES**

Actual = [Total HUB(6) procurement + Total Small Business procurement]/Total Company procurement			
	Actual for Previous FY	Actual for Current FY	Percentage change
Construction Contracts (1)	N/A	N/A	N/A
Commodities Contracts (2)	N/A	N/A	N/A
Other Services (3)	N/A	N/A	N/A
Professional Services Contracts (4)	N/A	N/A	N/A
Major Equipment (5)	N/A	N/A	N/A
**Other	N/A	13%	N/A

**Please note: Level 3 does not separate procurement by type, therefore everything has been combined as other.

(1) Construction -- Construction done by general contractors and special trade contractors which includes new work, additions, alterations, reconstruction, installations, repairs, remodeling, renovating, and repair of office buildings. Heavy construction other than buildings such as pipelines, communication and power lines, sewer and water mains, asphalt and concrete construction of roads, trenching, cable laying, conduit construction, land clearing and leveling.

(2) Commodities -- All materials, goods or tangibles purchased to conduct business, not including fuel or purchased power contracts and major equipment purchases and rentals.

(3) Others Services -- All specialty work, special circumstances that required contract labor, special consultants or other non-defined services. Examples include audio/visual, staffing services, landscaping, forestry, tree trimming, art and decorative services, janitorial, travel/lodging, automotive repair, and photography.

(4) Professional Services -- Contracted professional services which include legal, consulting, health, engineering, accounting, advertising/marketing, architectural, real estate, computer services, research and analysis, education/training, insurance, surveying services, weather services, environmental, financial, etc.

(5) Major Equipment -- Includes all major equipment purchases and rentals including but not limited to transmission and distribution equipment, power plant equipment, substation equipment, heavy construction equipment, fleet requirements, etc.

(6) HUB -- Business enterprises that are 51% owned and controlled by U.S. citizens who are socially disadvantaged because of their identification as members of certain groups, including African-American, Hispanic, Native American, or Asian Pacific and Women as defined in the Texas Government Code § 481.101(1).

(7) Other -- Any commodity or service not covered by the above categories.