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Connecting with Customers at the Speed of Light

02 January 2007

Janice Ervin  
Texas Public Utility Commission  
1701 Congress Avenue  
Austin, TX 78701

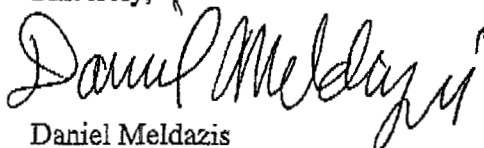
RE: 2006 Workforce and Supplier Diversity Report of Broadwing Communications LLC

VIA ELECTRONIC FILING &amp; OVERNIGHT MAIL

Dear Ms. Ervin:

Please find enclosed the 2006 Workforce and Supplier Diversity report for Broadwing Communications LLC (Broadwing). In regards to the report, Broadwing does not categorize its vendors as the form does on page two. Please let me know if you have any questions concerning the report. I can be reached at 312-895-8400. Thank you.

Sincerely,



Daniel Meldazis  
Director Regulatory Affairs

Cc: The Honorable Rick Perry via US Mail  
The Honorable David Dewhurst via US Mail  
The Honorable Tom Craddick via US Mail  
The Honorable Garnet Coleman via US Mail  
The Honorable Juan "Chuy" Hinojosa via US Mail  
The Honorable Pete Gallego via US Mail

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www.broadwing.com

695

# WORKFORCE AND SUPPLIER DIVERSITY FORM WORKFORCE DIVERSITY

Occupational Categories	NUMBER OF TEXAS FULL-TIME EMPLOYEES FOR REPORTING YEAR													
	Combined Total	Company Totals		Caucasian		African American		Hispanic		Asian		American Indian		
		Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	
Officials and Managers	293	218	75	200	59	7	8	8	7	3	1	0	0	
Professionals	416	254	162	188	125	14	7	21	16	29	13	2	1	
Technicians	417	370	47	225	28	57	14	64	4	22	1	2	0	
Sales Workers	185	139	46	121	41	4	2	11	1	3	2	0	0	
Office and Clerical	280	69	211	34	138	11	34	21	31	3	7	0	1	
Craft Workers (Skilled)	5	5	0	1	0	1	0	3	0	0	0	0	0	
Operatives (Semi-skilled)	1	1	0	1	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	
Previous Year Totals	1533	1016	517	776	364	77	76	97	56	62	20	4	1	
This Year Totals	1597	1056	541	770	391	94	65	128	59	60	24	4	2	

NOTE: Double-click on embedded Excel chart to open. Click on a cell or use arrow keys to select an occupational category and ethnic group to update workforce diversity numbers. Do not enter information in Combined Total and Company Totals columns or the This Year Totals row as these will update automatically. Cells left blank will be counted as zero. Click anywhere outside of chart to exit.

**WORKFORCE AND SUPPLIER DIVERSITY FORM**  
**HUB/SMALL BUSINESS PROCUREMENT AS A PERCENTAGE OF TOTAL COMPANY PROCUREMENT**

Actual % = [Total HUB(1) procurement + Total Small Business(2) procurement]/Total Company procurement		Actual % for Previous FY	Actual % for Current FY	Percentage Change
Construction Contracts (3)				%
Commodities Contracts (4)				%
Other Services (5)				%
Professional Services Contracts (6)				%
Major Equipment (7)				%
Other (8)			2.0400%	%

(1) HUB -- Pursuant to Texas Government Code § 481.191(4), HUB means: (A) a corporation formed for the purpose of making a profit in which at least 51 percent of all classes of the shares of stock or other equitable securities is owned by one or more persons who are members of certain groups, including black Americans, Hispanic Americans, women, Asian Pacific Americans, and American Indians; (B) a sole proprietorship formed for the purpose of making a profit that is 100 percent owned, operated, and controlled by a person described by Paragraph (A) of this subdivision; (C) a partnership formed for the purpose of making a profit in which 51 percent of the assets and interest in the partnership is owned by one or more persons described by Paragraph (A) of this subdivision. Those persons must have proportionate interest and demonstrate active participation in the control, operation, and management of the partnership's affairs; or (D) a joint venture in which each entity in the joint venture is a historically underutilized business under this subdivision.

(2) Small Business -- Pursuant to Texas Government Code § 481.191(6), Small Business means a corporation, partnership, sole proprietorship, or other legal entity that: (A) is domiciled in this state; (B) is formed to make a profit; (C) is independently owned and operated; and (D) employs fewer than 100 full-time employees.

(3) 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.

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

(5) 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.

(6) 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.

(7) 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.

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

**WORKFORCE AND SUPPLIER DIVERSITY FORM  
COMPANY INITIATIVES**

- (1) **Describe the specific initiatives, programs, and activities undertaken under the plan during the preceding year:**

Broadwing added the Monster Job Posting Diversity Package to its recruiting effort to assist in reaching out to the minority job seeking community. Monster Job Search Website is our primary means of recruiting new employees. Broadwing believes that utilizing Monster will give Broadwing's career opportunities a wider audience and increase the probability of a more diverse population that will seek a career with the company.

**WORKFORCE AND SUPPLIER DIVERSITY FORM  
COMPANY INITIATIVES**

- (2) **Make an assessment of the success of each of the specific initiatives, programs, and activities listed above:**

Our recruiting program saw a significant increase in hiring among African American and Hispanic men compared to a year ago (20-30%), while the companies over all growth was much smaller (4%). The overall Female population grew slightly during this same period (4.6%).

- (3) **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:**

Due to the impending acquisition of Broadwing by Level 3 Communications, which is expected to be approved in very early January 2007, workforce plans will be developed by Level 3 as part of a comprehensive corporate plan.

**WORKFORCE AND SUPPLIER DIVERSITY FORM  
COMPANY INITIATIVES**

**(4) State the specific progress made under the plan filed by the utility:**

Do to the acquisition of Focal Corporation by Broadwing in late 2004, and the subsequent reorganizations, downsizings and management changes that occurred, the plans filed by Broadwing became inoperative. Regardless of these changes the company has been able to make significant improvements in its workforce diversity. The total amount spent with minority and female owned business in 2006 was \$2,700,000.00.