



Competitive Cable & Video Services Act Minority Owned Business Participation Plan Report For 2017



TENNESSEE PUBLIC UTILITY COMMISSION
JUNE 2018

TENNESSEE PUBLIC UTILITY COMMISSION



502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

June 27, 2018

The Honorable Bill Haslam
Governor
Tammy Letzler
Chief Clerk of the House
Russell Humphrey
Chief Clerk of the Senate

Gentlemen:

Transmitted herewith is the annual report required by the General Assembly concerning Minority Owned Business Participation Plans set forth in the Competitive Cable and Video Services Act ("CCVSA") codified as Tenn. Code Ann. § 7-59-301 through § 7-59-318. The report is based on information provided by companies that received state-issued certificates of franchise authority under the CCVSA from 2008 through 2017. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Earl Taylor'.

Earl R. Taylor
Executive Director

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Background

Public Chapter 932 of 2008, known as the Competitive Cable and Video Services Act, (“CCSVA”), became law on July 1, 2008 and is codified as Tenn. Code Ann. § 7-59-102 through § 7-59-318. The CCSVA opened markets for cable and video services to competition by allowing providers to receive state-issued certificates of franchise authority. Applicants must provide a plan to facilitate the participation of minority owned businesses when establishing, providing or expanding cable or video services and related support facilities pursuant to § 7-59-313(c).¹ Tenn. Code Ann. § 7-59-313(a)(1) defines a minority owned business as:

...a business that is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of the business and who is impeded from normal entry into the economic mainstream because of:

- (A) Past practices of discrimination based on race, religion, ethnic background or sex, including, but not limited to, women;
- (B) A disability as defined in § 4-26-102, including, but not limited to, disabled veterans; or
- (C) Past practices of racial discrimination against African-Americans.

Tenn. Code Ann. § 7-59-313(a)(2) defines a minority owned business plan as:

...a business plan for actively soliciting bids from minority owned businesses and letting contracts to such businesses when establishing, providing or expanding cable or video services and related support facilities. The plan shall include the following information:

- (A) A proposal for purchasing goods and services from minority owned businesses;
- (B) Information on programs to provide technical assistance to such businesses; and
- (C) A statement of intent to follow its minority owned business participation plan.

The goals of a minority owned business participation plan are “...to maximize participation of minority owned businesses through both prime and second tier business contracting opportunities and shall strive to achieve a level of minority owned business participation representative of the population demographics of this state.”²

¹ Tenn. Code Ann. § 7-59-313(c) states, “Notwithstanding any provision of this part to the contrary, a state-issued certificate of franchise authority shall not be issued by the department to any applicant that fails to include a minority owned business participation plan in the applicant’s application. The department shall review each application to confirm that the minority owned business participation plan includes all information required pursuant to this section.”

² Tenn. Code Ann. § 7-59-313(b).

Annual Review

Tenn. Code Ann. § 7-59-313(d) requires the Tennessee Public Utility Commission to conduct an annual review of the plans:

Notwithstanding any provision of this part to the contrary, the department shall annually review each holder of a state-issued certificate of franchise authority to determine compliance with the holder's minority owned business participation plan. In conjunction with the review, by January 31 of each year, each holder of a state-issued certificate of franchise authority shall prepare and submit an annual report to the department concerning the holder's minority owned business participation plan and compliance with the plan. The department shall annually prepare a compliance report to be delivered to the governor and the clerks of the senate and the house of representatives. The compliance report shall also be posted on the web site of the department.³

By the end of 2017, the Tennessee Public Utility Commission had granted twenty state-issued certificates of franchise authority. Each franchise holder has submitted its report concerning its small and minority owned business participation plan. Below are some highlights.

1. BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee provided a copy of its Small and Minority Owned Business Plan.
2. Charter Communications submitted a copy of its Minority Vendor outreach program, which includes a qualifying form sent to 409 vendors, 77 of which met Minority status. Charter also supplied a letter that it is sending to certified Minority vendors that was supplied by the Tennessee Department of Economic & Community Development.
3. Knology spent approximately \$61,000 during 2017 with ten minority-owned Tennessee vendors.
4. Cable One indicates that it spent a total of \$7,714 with five minority-owned vendors in Tennessee.
5. Highland Telephone Cooperative provided a copy of its Minority Owned Business Participation Plan and indicated that its plan continues in force and effect as a policy of the Cooperative.
6. Comcast indicated that it continues to comply with its plan and notes that it spent 10.8% of its total supplier expenditures with diverse vendors.
7. The Electric Power Board of Chattanooga ("EPB") indicated that its Fiber Optics Division conducted business with eleven minority-owned Tennessee companies and spent in excess of \$2.2 million with these companies.
8. Twin Lakes Communications, Inc. stated that it continues to comply with its Minority-Owned Telecommunications Business Participation Plan, a copy of which it submitted with its response.
9. North Central Telephone Cooperative stated that it continues to adhere to the Minority-Owned Business Participation Plan.
10. TDS Telecom Service Corporation submitted a copy of the Minority-Owned Business Participation Plan.

³ Tenn. Code Ann. § 7-59-313(d).

11. Spring City Cable TV, Inc. submitted a copy of the Minority-Owned Business Participation Plan.
12. United Communications submitted a copy of its Minority-Owned Business Participation Plan and indicated that there were no changes to the plan in 2017.
13. West Kentucky Rural Telephone Cooperative Corporation submitted a copy of its Minority-Owned Business Participation Plan.
14. Millington CATV ("MCATV") indicated that it will continue to comply with its Minority-Owned Business Participation Plan and look for ways to increase its contacts and partnerships with Minority-Owned suppliers. MCATV stated that is paid minority-owned businesses approximately \$26,600 in 2017.
15. Community Television Company ("CTC") stated that it implemented the Minority-Owned Business Participation Plan included in its application for a state issued certificate of franchise authority. CTC stated that it is in compliance with the plan.
16. InfoStructure Inc. supplied a letter that it is sending to certified Minority vendors that was supplied by the Tennessee Department of Economic & Community Development.
17. Google Fiber stated that it continues to comply with the Minority-Owned Business Participation Plan. Google Fiber notes that its two largest suppliers were women-owned and veteran-owned.
18. Trenton TV Cable Company stated that it continues to comply with its Minority-Owned Business Participation Plan.
19. Crystal Clear Technologies stated that its Minority-Owned Business Participation Plan is in effect as the policy of the company.
20. Spirit Broadband provided a copy of it minority-owned business participation plan.

Appendix 1

AT&T



AT&T

Dennis Wagner
Director - External & Legislative Affairs

AT&T Tennessee
333 Commerce Street
Suite 2102
Nashville, TN 37201-1800

T: 615.214.4066
F: 615.214.8867
dennis.wagner@att.com
www.att.com

2018 JAN 25 PM 2:14

RECEIVED
CONSUMER SERVICES DIVISION

JAN 25 2018

TN PUBLIC UTILITY COMMISSION

January 25, 2018

Mr. Jerry Kettles
Director, Economic Analysis
Tennessee Public Utility Commission
502 Deaderick Street - 4th Floor
Nashville, TN 37243

Re: *Small and Minority-Owned Telecommunications Business Participation Plan*

Dear Mr. Kettles:

In response to your e-mail reminder of January 22, 2018 to BellSouth Telecommunications, LLC, attached is the Small and Minority-Owned Telecommunications Business Plan for the following AT&T entities:

- BellSouth Telecommunications, LLC d/b/a AT&T Tennessee ✓
- BellSouth Long Distance, LLC ✓
- SBC Long Distance, LLC ✓
- AT&T Corp (f/k/a AT&T Communications of the South Central States) ✓
- Teleport Communications America, LLC (f/k/a TCG MidSouth, Inc.) ✓

Please feel free to contact me if you have any questions.

Very truly yours,

Dennis Wagner

**AT&T Tennessee's
Minority Owned Business Participation Plan**

AT&T Tennessee hereby sets forth its business plan for actively soliciting bids from minority-owned businesses and letting contracts to such businesses when establishing, providing or expanding cable or video services and related support facilities.

I. Definitions

A. For the purposes of this plan, unless the context otherwise requires:

1. "Minority owned business" means a business that is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of such business and who is impeded from normal entry into the economic mainstream because of:
 - a. Past practices of discrimination based on race, religion, ethnic background, or sex including, but not limited to, women;
 - b. A disability as defined in T.C.A. § 4-26-201 including, but not limited to, disabled veterans; or
 - c. Past practices of racial discrimination against African-Americans; and
2. "Minority owned business participation plan" means a business plan for actively soliciting bids from minority owned businesses and letting contracts to such businesses when establishing, providing or expanding cable or video services and related support facilities. Such plan shall include the following information:
 - a. A proposal for purchasing goods and services from minority owned businesses;
 - b. Information on programs to provide technical assistance to such businesses; and
 - c. A statement of intent to follow its minority owned business participation plan.

II. AT&T's Supplier Diversity Policy Statement

It is the policy of AT&T to promote, increase and improve the quality of the overall participation of minority, women and service-disabled veteran owned business enterprises in its purchases of materials and services.

Maximum practicable opportunity shall be given to minority, women and disabled veteran-owned business enterprises to participate as suppliers of materials and services to AT&T.

AT&T also encourages subcontracting opportunities for minority, women and disabled veteran-owned businesses by requiring Supplier Diversity Participation Plans from its prime suppliers.

III. AT&T's Proposal for Purchasing Goods and Services From Minority Owned Businesses

AT&T promotes the purchasing of goods and services from minority owned businesses through its extensive AT&T Supplier Diversity Program. Supplier Diversity Program staff at AT&T assist current and potential diversity suppliers in identifying and developing business opportunities with the company.

AT&T Supplier Diversity Programs are designed to promote, increase and improve the quality of the overall participation of small, minority, women and disabled veteran business enterprises in AT&T's supply chain. AT&T looks for opportunities to work with diversity suppliers in all aspects of its business – from advertising to central office engineering, computers, outside plant construction and network provisioning. Promoting the participation of a diverse supplier base not only provides better business solutions, it also cultivates greater customer loyalty, bidding advantages, and public policy support in the communities AT&T serves.

AT&T's diversity program has three main components – a program to encourage minority suppliers; a program to encourage minority hiring by AT&T's prime suppliers; and participation in diversity organizations.

Specifically, AT&T has a specific program pursuant to which it seeks to hire diverse suppliers. As part of the program, AT&T provides potential suppliers with information and contacts to assist those firms seeking to do business with AT&T. AT&T's Supplier Diversity Managers and Strategic Sourcing Managers work closely with minority suppliers to find opportunities to do business with AT&T. AT&T provides coaching and mentoring to its strategic diversity firms to ensure they continue to meet AT&T's supplier requirements. AT&T encourages diversity suppliers to gain quality certifications such as ISO 9000 and TL9000 to remain on the competitive edge.

Another of the essential efforts within the AT&T Supplier Diversity Programs is AT&T's Prime Supplier Participation Program. AT&T's Prime Supplier Program helps its prime suppliers increase the utilization of minority, women and disabled-veteran owned businesses in its supply chain through subcontracting and value added reseller arrangements. The program specifically helps prime suppliers (a) establish or enhance their own supplier diversity programs; (b) develop

an annual plan with AT&T outlining how the supplier can provide better business solutions by working with diverse companies; and (c) report quarterly results to AT&T showing progress towards the supplier's diversity goals.

AT&T also is an active corporate member in important organizations such as the National Minority Supplier Development Council, the Women's Business Enterprise National Council and the Association for Service Disabled Veterans. AT&T also holds memberships with numerous minority Chambers of Commerce that work to promote supplier diversity. AT&T also provides funding to support several executive management training programs for minority owned businesses. The programs funded are among the most highly-regarded, graduate-level executive training programs in the country, providing valuable coaching and tangible business benefits to suppliers.

IV. Information On Programs To Provide Technical Assistance To Such Businesses

AT&T provides information for minority owned businesses on its website at www.att.com. In addition, as set forth above, AT&T has an active mentoring process to encourage minority owned businesses to become suppliers of AT&T.

V. Statement Of Intent To Follow Its Minority Owned Business Participation Plan

Pursuant to this plan, AT&T Tennessee shall strive to maximize participation of minority owned businesses through both prime and second tier business contracting opportunities and shall strive to achieve a level of minority owned business participation representative of the population demographics of the state of Tennessee.

By January 31 of each year, AT&T Tennessee will prepare and submit an annual report to the Tennessee Regulatory Authority concerning AT&T Tennessee's minority owned business participation plan and compliance with such plan.

Appendix 2

Charter Communications



January 29, 2018

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

To whom it may concern:

Enclosed is Charter Communications Minority Vendor outreach program for 2017.

- Exhibit A represents the document we sent to existing vendors to identify Minority Vendors. To date, 409 vendors received the document, 143 have responded, and 77 of those met the Minority status.
- Exhibit B represents the letter we are sending to certified Minority Vendors supplied to us by the Tennessee Department of Economic and Community Development. Our hope is they will respond and become part of our bid process.

Should you have any questions do not hesitate to contact me @273-2712.

Regards,

A handwritten signature in black ink that reads "Nick Pavlis".

Nick Pavlis
Director of Government Relations
Tennessee Operations

Enclosure: Exhibit A, B

Exhibit A



10417 Wallace Alley St. Kingsport, TN 37663

VENDOR INFORMATION

Vendor Name	
Address	Remit to Address if different:
City, State, Zip	Remit to City, State, Zip:
Phone #	Fax #
Email Address	
Do you have an Internet Website? If so, please provide below:	
Parent or Subsidiary? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please provide info below:	

- Type of Business:
- Corporation
 - Government
 - Limited Liability Company (LLC)
 - Partnership
 - Sole Proprietorship (Individual)

- Minority Status:
*Please make sure
this section is
marked.
- African American Female
 - African American Male
 - Asian Indian Female
 - Asian Indian Male
 - Asian Pacific Female
 - Asian Pacific Male

Exhibit A

- Hispanic Female
- Hispanic Male
- Native American Female
- Native American Male
- Non Minority
- White Female

Signature

Printed Name

Exhibit B

Dear [Potential Vendor]:

Charter Communications values doing business with vendors both large and small. We are also committed to doing business with as many vendors as possible located in Tennessee. With the assistance of the Department of Economic and Community Development we received your name as a vendor that Charter could potentially utilize for future services. If you have interest in becoming an approved vendor then please complete the following documents and submit to:

Nick Pavlis
Director of Government Relations
Charter Communications
1774 Henry G. Lane Street
Maryville, TN 37801

If your companies credentials match our qualifications we will contact you to participate in our bid process as your services are needed.

Thank you in advance for your interest and we look forward to your response and doing business with you in the future.

Regards,



Nick Pavlis
Director of Government Relations
Tennessee/Louisiana Operations

Appendix 3

Knology



January 29, 2018

Via Electronic Mail
jerry.kettles@tn.gov

Mr. Jerry Kettles
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

**Re: Annual Report on Compliance with Minority Business
Participation Plan**

Dear Mr. Kettles:

Pursuant to §7-59-313 of the Tennessee Code, please find Knology's (dba WOW! Internet, Cable and Phone) Minority Owned Business compliance status report. As always, thank you in advance for your courtesies in this matter. Should you have any questions about the enclosed material, please don't hesitate to call me at (706) 645-3966.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "Bruce Schoonover, Jr.", written over a horizontal line.

Bruce Schoonover, Jr.
Director – Regulatory Compliance
WOW! Internet, Cable and Phone

Enclosures

Knology of Tennessee, Inc. dba WOW! Internet, Cable and Phone

MINORITY OWNED BUSINESS PARTICIPATION PLAN

Pursuant to the Competitive Cable and Video Services Act, Public Chapter 932 (The "ACT" § 14, Knology of Tennessee, Inc. dba WOW! Internet, Cable and Phone ("WOW!")) submits this minority owned business participation plan (the "Plan").

I. PURPOSE

The purpose of the Competitive Cable and Video Services Act, Public Chapter 932 (the "Act") § 14 is to provide opportunities for minority-owned businesses to provide goods and services to video service providers. WOW! is committed to the goals of § 14 of the Act and to taking steps to support the participation of minority-owned businesses in the video-cable industry. WOW! will continue to work to provide opportunities for minority-owned businesses to compete for contracts and subcontracts for goods and services. WOW! will make efforts in its procurement process to identify and inform minority-owned businesses that are qualified and capable of providing goods and services to WOW! of such opportunities. WOW! will also seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

II. DEFINITIONS

Minority-Owned Business. Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex, or national origin and such business has annual gross receipts of less than \$4,000,000.

III. ADMINISTRATION

The WOW! Plan will be overseen by the individual named below, hereinafter referred to as the Administrator. The Administrator of the Plan will be: Mr. Wayne Charles.

The Administrator's responsibilities will include:

- 1) Maintaining an updated Plan in full compliance with § 14 of the Act and the rules and orders of the Tennessee Regulatory Authority.
- 2) Ensuring policies and procedures necessary for the successful implementation of the Plan are in place.

- 3) Preparing and submitting such forms as may be required by the Tennessee Regulatory Authority, including the filing of required annual updates.
- 4) Serving as the primary liaison to the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and small and minority-owned businesses to locate and use qualified minority-owned businesses.
- 5) Monitor development opportunities to use minority-owned business and encourage such businesses to participate in and bid on contracts and subcontracts.
- 6) Providing records and reports in any authorized surveys as require by the TRA.
- 7) Reviewing a record-keeping system to track qualified minority-owned businesses and efforts to use such businesses.
- 8) Reviewing information and educational activities within WOW! to seek, encourage, and promote the use of minority-owned businesses.

In performance of the duties, the Administrator will utilize a number of resources, including:

Chambers of Commerce
The Tennessee Department of Economics and Community Development
Small Business Administration, Office of Minority Business
The National Minority Supplier Development Counsel
The National Association of Women Business Owners
The National Association of Minority Contractors
Historically Black Colleges, Universities, and Minority Institutions

The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

WOW! will maintain records of qualified minority-owned businesses and efforts to use the goods and services of such businesses. In addition, WOW! will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this Plan.

WOW! will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. Moreover, WOW! will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

2017 MINORITY OWNED BUSINESS PARTICIPATION PLAN
ACTIVITY UPDATE

WOW! currently uses ten small or minority-owned businesses as vendors. WOW! spent approximately sixty one thousand (\$61,000) with these vendors during 2017. WOW! will continue to stay in touch with the agencies listed in our plan as opportunities for contracts and subcontracts with our company arise.

WOW! Internet, Cable and Phone

By:  _____

Dated: 1/29/18 _____

Appendix 4

Cable One



210 E. EARLL DRIVE
6TH FLOOR
PHOENIX, AZ 85012
PH: 602-364-6195
FAX: 602-364-6013
EMERSON.YEARWOOD@CABLEONE.BIZ

EMERSON G. YEARWOOD
ASSOCIATE GENERAL COUNSEL

January 26, 2018

*Via First Class Mail and email
jerry.kettles@tn.gov*

Tennessee Regulatory Authority
ATTN: Jerry Kettles
502 Deaderick Street
Nashville, TN 37243

Re: Annual Report on Compliance With Minority Business Participation Plan

Dear Mr. Kettles:

Pursuant to its state-issued Certificate of Franchise Authority, Cable One, Inc hereby submits the following report on compliance with its Minority-Owned Business Participation Plan. During the 2016 calendar year, Cable One did business with the following minority- owned businesses in the State of Tennessee.

<u>Vendor</u>	<u>Expenditure (\$)</u>
SEZ SEW, Inc. P. O. Box 707 325 S. Mill Ave. Dyersburg, TN 38025 Phone 737-285-2120 Owners: Betty Dennis/Kim Bingham (female)	\$160.00
Private Cleaning Services 3766 Sharpsferry Rd Newbern, TN 38059 Phone: 731-627-0078 Owner: Terry Douglas (female)	\$6,600.00
Jimmy John's 1130 Highway 51 Bypass W Suite 38 Dyersburg, TN 38024 Phone: 731-287-7799	\$124.00

Owner: Jaime/Will Motter (female)

El Patio

\$830.00

1130 Highway 51 Bypass N

Dyersburg, TN 38024

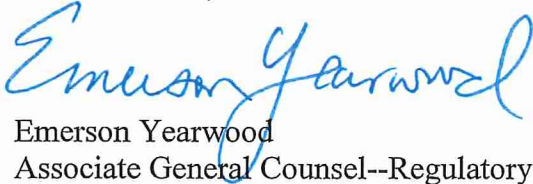
Phone: 731-287-9488

Owner: Jorge Leon (male minority)

In addition to local purchasing efforts, most Cable One purchasing is centrally managed from the company's Phoenix, AZ headquarters. A list of minority and female vendors used company-wide is also attached. Please do not hesitate to contact me at (602) 364-6195 if you require additional information on this matter.

Sincerely,

CABLE ONE, LLC



Emerson Yearwood

Associate General Counsel--Regulatory Affairs

Copy: D. Lindsay

Vendor Number	Vendor Name	Class Code	Status
15958	BISBEE HIGH SCHOOL	11	ACTIVE
4775	CHALLENGER CABLE SALES	14	ACTIVE
1275	MACS INC	15	ACTIVE
1428	AMERIPRIDE SERVICES INC	15	ACTIVE
18121	DOWNTOWN COMMUNITY PARTNERSHIP	15	ACTIVE
22630	WESTERN REFRIGERATION SERVICE	15	ACTIVE
2547	SAN PATRICIO COUNTY	15	ACTIVE
2661	SOUTHWEST PIPING SUPPILES INC	15	ACTIVE
3458	THE PORT LAVACA WAVE	15	ACTIVE
37615	RED E MAID	15	ACTIVE
3810	NOLL COLLECTION SERVICE, INC. (NSC)	15	ACTIVE
46494	CALL ONE, INC	15	ACTIVE
492	MP INSTRUMENT CO	15	ACTIVE
6915	AD BLOCKS	15	ACTIVE
7738	GIBSON ELECTRIC MEMBERS CORP	15	ACTIVE
1375	BATAVIA SERVICES INC.	22	ACTIVE
1455	CHICKASAW NATION DIVISION OF COMMERCE	23	ACTIVE
1925	PRAETORIAN PROTECTIVE SERVICE	23	ACTIVE
442	OKLAHOMA CABLE SERVICES	23	ACTIVE
12560	TAYLOR AIR CONDITIONING & HEATING	MINORITY	ACTIVE
10095	BATTLE CREEK MUNICIPAL LIGHT & POWER	NOCLASS	ACTIVE
10107	CITY OF RULEVILLE	NOCLASS	ACTIVE
10108	TOWN OF RENOVA	NOCLASS	ACTIVE
10117	JOHN REPISCHAK	NOCLASS	ACTIVE
10132	PRESCOTT NEWSPAPERS, INC	NOCLASS	ACTIVE
10168	BIG EDDIES GRASSCUTTING	NOCLASS	ACTIVE
10177	KRISTA WITHEROW	NOCLASS	ACTIVE
10192	COTTON ELECTRIC COOPERATIVE, INC.	NOCLASS	ACTIVE
10205	NEW MEXICO TAXATION AND REVENUE	NOCLASS	ACTIVE
10217	COKER PEST CONTROL HEATING & AIR	NOCLASS	ACTIVE
10241	FIRST AMERICAN TITLE INSURANCE COMPANY	NOCLASS	ACTIVE
10319	SUNUP ROTARY CLUB OF PRESCOTT	NOCLASS	ACTIVE
1032	CITY OF TILDEN	NOCLASS	ACTIVE
10393	MICHAEL DRAHOTA	NOCLASS	ACTIVE
10394	BARTON BROWN	NOCLASS	ACTIVE
10403	WASHITA COUNTY TREASURER	NOCLASS	ACTIVE
10404	STEPHENS COUNTY TAX TREASURER	NOCLASS	ACTIVE
10405	BECKHAM COUNTY TREASURER	NOCLASS	ACTIVE
10406	LOVE COUNTY TREASURER	NOCLASS	ACTIVE
10418	MASS MARKETING INC	NOCLASS	ACTIVE
10419	OCEAN SPRINGS CHAMBER OF COMMERCE	NOCLASS	ACTIVE
10425	BJ HARRIS, INC.	NOCLASS	ACTIVE
10444	SMOYER TRENCHING & CABLE INC	NOCLASS	ACTIVE
10510	CITY OF NEW CORDELL	NOCLASS	ACTIVE
10511	TOWN OF OAKLAND	NOCLASS	ACTIVE
10541	CITY OF CLEVELAND	NOCLASS	ACTIVE
10571	FANNIN COUNTY APPRAISAL DISTRICT	NOCLASS	ACTIVE
10574	SUNFLOWER COUNTY	NOCLASS	ACTIVE
10575	YAZOO COUNTY	NOCLASS	ACTIVE
10578	QUITMAN COUNTY TAX ASSESSOR	NOCLASS	ACTIVE
10600	ODESSA ROTARY CLUB	NOCLASS	ACTIVE
10631	SULPHUR CHAMBER OF COMMERCE	NOCLASS	ACTIVE
10683	WOODHAVEN PLACE	NOCLASS	ACTIVE
10684	GREEN RIVER COUNTRY LLP	NOCLASS	ACTIVE
10721	DAILY EQUIPMENT COMPANY	NOCLASS	ACTIVE
10734	JOYCE PERKINS	NOCLASS	ACTIVE
10755	RADIANT COMMUNICATIONS	NOCLASS	ACTIVE
10775	CHERYL CARLSON	NOCLASS	ACTIVE
10776	DIGICOMM INTERNATIONAL INC	NOCLASS	ACTIVE
10826	MISSOURI CABLE TELECOMMUNICATIONS ASSOC	NOCLASS	ACTIVE
10834	CITY OF MARIETTA	NOCLASS	ACTIVE
10836	AMERICAN REGISTRY FOR INTERNET NUMBERS	NOCLASS	ACTIVE

Vendor Class Listing By: Vendor Class Code

**Cable One, Inc.
Standard Style**

CLASS CODE	DESCRIPTION
10	Women African American
11	Women Hispanic
12	Women Asian
13	Women American Indian
14	Women White
15	Women Owned
20	Men African American
21	Men Hispanic
22	Men Asian
23	Men American Indian
25	Hispanic Owned
MINORITY	Minority Owned
NOCLASS	No Class Code Used
NONMIN	Non Minority

Total Number of Vendor Classes Listed : 14

Appendix 5
Highland Telephone Cooperative



7840 Morgan County Hwy.
P.O. Box 119
Sunbright, TN 37872

EMAIL
highland@highlandtel.net

voice 423/628 2121
423/663 3939
606/376 5311

Fax 423/628 2409

January 23, 2018

Mr. Jerry Kettles
Tennessee Regulatory Authority
502 Deaderick Street, Fourth Floor
Nashville, TN 37243

**RE: *Response of Highland Telephone Cooperative, Inc.
Minority Owned Business Participation Plan***

Dear Mr. Kettles:

Please find enclosed the Minority Owned Business Participation Plan previously established by Highland Telephone Cooperative, Inc. This Plan was enacted to conform to the requirements of *Tennessee Code Annotated 7-59-301 through 7-59-318* in 2009 and continues in force and effect as a policy of the Cooperative.

If you have any questions, please do not hesitate to contact me.

Sincerely,

HIGHLAND TELEPHONE COOPERATIVE, INC.

A handwritten signature in blue ink, appearing to read 'G. Mark Patterson', is written over a horizontal line.

G. Mark Patterson
General Manager

GMP/slj
Enclosure

EXHIBIT B

HIGHLAND TELEPHONE COOPERATIVE, INC.

MINORITY OWNED BUSINESS PARTICIPATION PLAN

Pursuant to Section 313 of the Tennessee Competitive Cable and Video Services Act (“Act”), Tenn. Code Ann. §7-59-313, Highland Telephone Cooperative, Inc. (“Highland”) submits this Minority Owned Business Participation Plan (“Plan”) as an exhibit to its Application for a State-Issued Certificate of Franchising Authority (“Application”).

I. OBJECTIVES

Highland is committed to the objectives stated in Section 313 of the Act with respect to minority-owned business participation. Highland will endeavor to promote participation of minority-owned businesses through business contracting opportunities. In addition, Highland will attempt to identify and inform minority-owned businesses that are qualified and capable of providing goods and services to Highland of such opportunities.

II. DEFINITIONS

For the purposes of this Plan, the following terms shall have the following meanings:

- A. “Minority-Owned Business” means a business that is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of such business and who is impeded from normal entry into the economic mainstream because of:
1. Past practices of discrimination based on race, religion, ethnic background, or sex including, but not limited to, women;
 2. A disability as defined in Tenn. Code Ann. §4-26-102 including, but not limited to, disabled veterans; or
 3. Past practices of racial discrimination against African-Americans.
- B. “Minority-Owned Business Participation Plan” means a business plan for actively soliciting bids from minority-owned businesses and letting contracts to such businesses when establishing, providing or expanding cable or video services and related support facilities. Such plan shall include the following information:
1. A proposal for purchasing goods and services from minority-owned businesses;

2. Information on programs to provide technical assistance to such businesses;
and
3. A statement of intent to follow its minority-owned business participation plan.

III. ADMINISTRATION

The Plan will be overseen by the individual named below, hereinafter referred to as the Administrator. The Administrator of the Plan will be:

G. Mark Patterson
General Manager
Highland Telephone Cooperative, Inc.
7840 Morgan County Highway
P. O. Box 119
Sunbright, TN 37872

The Administrator's responsibilities will include:


1. Maintaining and updating the Plan in full compliance with Section 313 of the Act and the rules and orders of the Tennessee Regulatory Authority ("TRA").
2. Ensuring that policies and procedures necessary for the successful implementation of the Plan are in place.
3. Preparing and submitting such forms as may be required by the TRA, including the filing of required annual updates.
4. Serving as the primary liaison with the TRA, other applicable agencies of the State of Tennessee, and minority-owned businesses.
5. Monitoring opportunities to use minority-owned businesses and encourage qualified minority-owned businesses to participate in and bid on contracts and subcontracts.
6. Managing a record keeping system to track qualified minority-owned businesses and efforts to engage such businesses.
7. Overseeing informational and educational activities within and outside Highland to identify, encourage and promote the use of minority-owned businesses.

In performance of such duties, the Administrator will utilize a number of resources, including, but not limited to, the following:

Chambers of Commerce
Tennessee Department of Economics and Community Development
Tennessee Department of Labor and Workforce Development
Small Business Administration, Office of Women's Business Ownership
Tennessee Minority Supplier Development Council
National Association of Minority Contractors, Memphis, TN
National Association of Women Business Owners, Nashville, TN

Highland will maintain records of qualified minority-owned businesses and efforts to use the goods and services of such businesses. In addition, Highland will maintain records of informational and educational activities with respect to minority-owned businesses. Highland will submit a report to the TRA by January 31 of each year concerning Highland's minority-owned business participation plan and its compliance with such plan. Highland will cooperate fully with any additional informational requests by the TRA. Finally, it is Highland's intent to follow the Plan as described herein.

HIGHLAND TELEPHONE COOPERATIVE, INC.

By: 
G. Mark Patterson, General Manager

Date: 1-23-18

Appendix 6

Comcast



January 23, 2018

Via Email & U.S. Mail

Mr. Jerry Kettles
Chief, Economic Analysis and Policy Division
Tennessee Public Utility Commission
60 James Robertson Parkway
Nashville, Tennessee 37243

Re: Minority-Owned Business Plan Annual Report – 2017

Dear Mr. Kettles:

In accordance with the Competitive Cable & Video Services Act, Tenn. Code § 7-59-313(d), Comcast Cable Communications Management, LLC, on behalf of its affiliates (“Comcast”), submits this annual report of compliance with its Minority-Owned Business Participation Plan (“Plan”).

Enclosed is a copy of the Plan filed as Exhibit E to Comcast’s application for a state-issued certificate of franchise authority, contained in Docket No. 09-00137.

Comcast continues to comply with the Plan. For 2017, 10.8% of the total supplier expenditures made by Comcast operating entities in the areas covered by its state-issued franchise certificate, as amended, went to diverse vendors.

Sincerely,

Scott McDonald
Director of Government Affairs

6200 The Corners Parkway, Suite 200
Norcross, Georgia 30092

Scott_McDonald1@cable.comcast.com
770.559.2130

Enclosure

cc: Andy Macke

Appendix 7

Electric Power Board of Chattanooga



2017 Annual Report

Minority Business Participation Plan Compliance

Competitive Cable and Video Services Act

**P.O. Box 182255
Chattanooga, TN 37422**

EPB is proud to support minority and women owned companies within the Tennessee area for many years. EPB's purchasing policy is committed to supporting minority and women-owned businesses and has developed a Minority and Women Owned Business Development Program ("MWOB"). This program has five (5) key objectives:

1. Identify goods and services for which minority and women owned businesses have the capability of becoming a source of supply;
2. Seeking out minority and women owned businesses capable of supplying goods and services for EPB's operations;
3. Using minority and women owned business whenever possible in order to increase the volume of expenditures into the minority business community;
4. Nurturing minority and women owned businesses and help them to become competitive, viable and self-sustaining enterprises; and
5. Foster relationships within the minority and women owned business community.

EPB has designated Michael Jones, Senior Manager, to oversee its Minority and Women Owned Business Development Program. Our MWOB Senior Manager works closely with the Purchasing Department and members of leadership to ensure the continued success of the program.

In 2017, EPB's Fiber Optics Division conducted business with eleven (11) minority owned companies in Tennessee and spent in excess of \$2,219,280.43 with these companies.

Additionally, EPB participated in outreach to continue developing and building relationships with minority and women owned businesses. These outreach efforts included:

- Hosting a number of M&WOB networking events at EPB throughout 2017;
- Continued partnerships with AABD Board, City of Chattanooga Multi-Cultural Development Department and Chattanooga Minority Connection Group to encourage minority and women-owned businesses to bid on EPB projects;
- Participation by EPB's Minority Business Manager and Purchasing Manager in development events hosted by the TVA, Erlanger, Volkswagen Expo and AABE National for vendors of M&WO businesses.

As always, EPB Fiber Optics will continue to seek out qualified minority and women owned businesses to supply products and services through EPB's purchasing policy and committed to increase opportunities for minority and women owned businesses going forward.

Appendix 8
Twin Lakes Communications, Inc.



January 15, 2018

Tennessee Regulatory Authority
Attn: Jerry Kettles
502 Deaderick Street, 4th FL
Nashville, Tennessee 37243

Dear Mr. Kettles:

In Re: Minority Owned Business Plan Annual Report

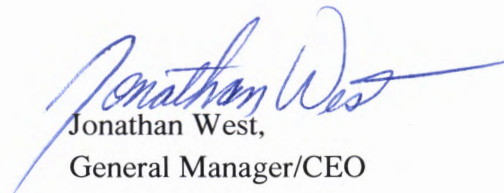
As required in the Competitive Cable & Video Services Act, Twin Lakes Communications provides this annual report concerning Twin Lakes Communications' Minority Owned Business Plan and its compliance with that plan. The Plan, which was provided as part of Twin Lakes Communications' franchise application is attached.

Twin Lakes Communications continues to comply with the Minority Owned Business Plan.

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

TWIN LAKES COMMUNICATIONS, INC.


Jonathan West,
General Manager/CEO

JW/ef

Attachment as stated

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

Pursuant to T.C.A. §65-5-112, as amended, Twin Lakes Communications, Inc. ("Twin Lakes Communications") submits this small and minority-owned Telecommunications business participation plan (the "Plan").

I. PURPOSE

The purpose of §65-5-112 is to provide opportunities for small and minority-owned businesses to provide goods and services to Telecommunications service providers. Twin Lakes Communications is committed to the goals of §65-5-112 and to taking steps to support the participation of small and minority-owned Telecommunications businesses in the Telecommunications industry. Twin Lakes Communications will endeavor to provide opportunities for small and minority-owned Telecommunications businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, Twin Lakes Communications will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to Twin Lakes Communications of such opportunities. Twin Lakes Communications' representatives have already contacted the Department of Economic and Community Development and the administrator of the Small and Minority-Owned Telecommunications Assistance Program, to obtain a list of qualified vendors. Moreover, Twin Lakes Communications will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

II. DEFINITIONS

As defined in §65-5-112.

Minority-Owned Business. Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000).

Small Business. Small Business shall mean a business with annual gross receipts of less than four million dollars (\$4,000,000).

III. ADMINISTRATION

Twin Lakes Communications' Plan will be overseen and administered by the individual named below, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting Twin Lakes Communications' full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Jonathan West
Twin Lakes Communications, Inc.
200 Telephone Lane
Gainesboro, Tennessee 38562
Telephone: (931) 268-2151
Facsimile: (931) 268-2734

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with §65-5-112 and the rules and orders of the Tennessee Regulatory Authority.
- (2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.

Minority-Owned Business. Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000).

Small Business. Small Business shall mean a business with annual gross receipts of less than four million dollars (\$4,000,000).

III. ADMINISTRATION

Twin Lakes Communications' Plan will be overseen and administered by the individual named below, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting Twin Lakes Communications' full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Jonathan West
Twin Lakes Communications, Inc.
200 Telephone Lane
Gainesboro, Tennessee 38562
Telephone: (931) 268-2151
Facsimile: (931) 268-2734

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with §65-5-112 and the rules and orders of the Tennessee Regulatory Authority.
- (2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.

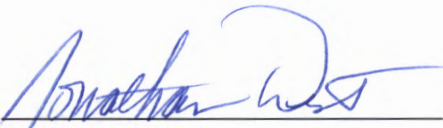
The National Association of Minority Contractors
Historically Black Colleges, Universities, and Minority Institutions

The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, small and minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

IV. RECORDS AND COMPLIANCE REPORTS

Twin Lakes Communications will maintain records of qualified small and minority-owned business and efforts to use the goods and services of such businesses. In addition, Twin Lakes Communications will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this plan. Twin Lakes Communications will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. Moreover, Twin Lakes Communications will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

Twin Lakes Communications, Inc.

By: 
Administrator

Dated: 1-3-2018

Appendix 9

North Central Telephone Cooperative



January 23, 2018

Tennessee Regulatory Authority
ATTN: Mr. Jerry Kettles
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Annual report on compliance with minority and business participation plan

Dear Mr. Kettles:

Please accept this letter as a report of North Central Communications, Inc., ("NCC") compliance with its minority owned business participation plan required under T.C.A. §65-5-212.

NCC continues to adhere to the plan and remains confident that our plan meets the expectations of T.C.A. §65-5-212.

Should you have any questions, please contact Johnny McClanahan at 615-666-2151.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nancy J. White".

Nancy J White, President/CEO

Enclosures

Pursuant to T.C.A. §65-5-212, as amended, North Central Communications (“NCC”) submits this small and minority-owned Telecommunications business participation plan (the “Plan”) in order to provide competing intrastate and local exchange services in Tennessee.

I. Purpose

The purpose of §65-5-212 is to provide opportunities for small and minority-owned businesses to provide goods and services to Telecommunications service providers. NCC is committed to the goals of §65-5-212 and to taking steps to support the participation of minority-owned businesses in the Telecommunications industry. NCC will endeavor to provide opportunities for minority-owned businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, NCC will make efforts to identify and inform minority-owned businesses that are qualified and capable of providing goods and services to NCC of such opportunities to do so. NCC will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

II. Definitions

As defined in §65-5-212.

Minority-Owned Business: Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex, national origin, or disability and such business has annual gross receipts of less than four million dollars (\$4,000,000).

III. Administration

NCC’s Plan will be overseen and administered by the individual named below, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting NCC’s full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Mr. Kevin Driver, Human Resources Manager
North Central Communications
872 Highway 52 By Pass East, PO Box 70
Lafayette, TN 37083
Telephone: 615-666-2151; fax: 615-666-6244

The Administrator’s responsibilities will include:

1. Maintaining an updated Plan in full compliance with §65-5-212 and the rules and orders of the Tennessee Regulatory Authority.

III. Administration (continued)

2. Establishing and developing policies and procedures necessary for the successful implementation of the Plan.
3. Preparing and submitting such forms as may be required by the Tennessee Regulatory Authority, including the filing of updates as may be required.
4. Serving as the primary liaison to and cooperate with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and small and minority-owned businesses to locate and use qualified small and minority-owned businesses as defined in §65-5-212.
5. Searching for and developing opportunities to use minority-owned businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.
6. Providing records and reports and cooperating in any authorized surveys as required by the Tennessee Regulatory Authority.
7. Establishing a record-keeping system to track qualified minority-owned businesses and efforts to use such businesses.
8. Providing information and educational activities to persons within NCC and training such persons to seek out, encourage, and promote the use of small and minority-owned businesses.

In performance of these duties, the Administrator will utilize a number of resources, including:

- Chambers of Commerce
- The Tennessee Department of Economic and Community Development
- The United States Department of Commerce
- Small Business Administration
- Office of Minority Business
- The National Minority Supplier Development Counsel
- The National Association of Women Business Owners
- The National Association of Minority Contractors
- Historically Black Colleges, Universities, and Minority Institutions

The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, small and minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

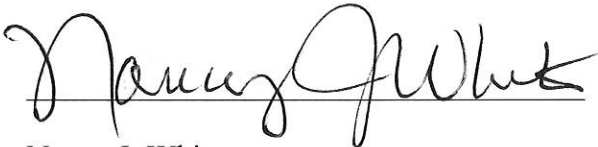
IV. Records and Compliance Reports

NCC will maintain records of qualified minority-owned business and efforts to use the goods and services of such businesses. In addition, NCC will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this plan.

NCC will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan when requested. Moreover, NCC will cooperate fully with surveys and studies required by the Tennessee Regulatory Authority.

Hereby submitted by:

North Central Communications, Inc.

By: 

Nancy J. White
President and CEO

Dated January 23, 2018

Appendix 10
TDS Telecom Service Corporation

TDS Telecom Service Corporation – Tennessee
January 2018

MINORITY-OWNED
BUSINESS PARTICIPATION PLAN

**MINORITY-OWNED
BUSINESS PARTICIPATION PLAN**

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6.0 PLAN TO ENSURE EQUITABLE OPPORTUNITY

7.0 PLAN REPORTING

MINORITY – OWNED BUSINESS PARTICIPATION PLAN

1.0 PLAN

- 1.1 This Minority –Owned Business Participation Plan (“Plan”) is submitted by TDS Telecom (“TDS” as required by the Competitive Cable & Video Service Act of 2008, codified as T.C.A 7-59-313
- 1.2 The Administration of this Plan is the responsibility of TDS. It is the policy of TDS to provide an opportunity for Minority Owned Businesses to compete for subcontracts awarded by TDS on a fair and equitable basis with certified suppliers and contractors.
- 1.3 This plan is a state of objectives and is not intended to create any legal obligation of TDS of any person or organization.

2.0 DEFINITIONS

- 2.1 Minority Business – For the purpose of this Plan, “minority business” means a business that is solely owned, or at least fifty-one (51%) of the assets or outstanding stock of which is owned by an individual who personally manages and controls the daily operations of such business, and who is impeded from non entry into the economic mainstream per T.C.A 7-59-313(1)(A-C)

3.0 PLAN RESPONSIBILITY AND POLICY STATEMENT

- 3.1 It is the policy of TDS to afford Minority –Owned Businesses an opportunity to participate in the performance of contracts in accordance with T.C.A 7-59-313(b).
- 3.2 As a purchaser of goods and services, it is TDS – responsibility to:
 - Identify and maintain a pool of qualified suppliers
 - Provide opportunities for Minority Owned Businesses to bid in those solicitations for products or services which they are capable of providing, and which meet RUS (Rural Utility Service) standards.

4.0 PLAN PERIOD OF EFFECTIVENESS

4.1 TDS is committed to providing affirmative access to contracting opportunities for Minority-Owned Businesses. TDS is proactive and will move toward inclusion of such firms in the supplier base. This plan represents an on-going commitment by the Company, and has no fixed time period for effectiveness.

5.0 PLAN ADMINISTRATION

5.1 TDS Plan Administrator is:
Mr. Jon Finseth
Manager – Procurement
525 Junction Road
Madison, WI 53717
Telephone: 608-664-4067
FAX: 608-664-4519

5.2 The Administrator manages the Plan as described below.

5.3 The Administrator's specific job duties, as they related to this Plan are as follows:

- (a) Develops and maintains policies and procedures to ensure that Minority-Owned Businesses have an equitable opportunity to be awarded contracts.
- (b) Establishes and maintains policies and procedures to ensure that Minority-Owned Businesses have an equitable opportunity to be awarded contracts.
- (c) Ensures inclusion of Minority – Owned Businesses in those solicitations for products or services which they are capable of providing, and which meet Unites States Department of Agriculture Rural Utility Service (RUS) standards.
- (d) Maintains Minority – Owned Businesses related correspondence and record keeping.
- (e) Coordinates activities during the conduct of any compliance review by the Tennessee state agencies.
- (f) Attends or arranges for attendance by appropriate members of management at, Minority Business Enterprise Seminars, Trade Fairs, and Conventions.

6.0 PLAN TO ASSURE EQUITABLE OPPORTUNITY

6.1 The Administrator shall ensure that appropriate source listings and services are properly utilized in support of the Plan. Sources / listings include, but are not limited to the following:

- (a) The TDS approved Master Supplier list.
- (b) Information received from the Small Business Administration Procurement Automated Source System (PASS).
- (c) Information sources received from the TN Department of Economic Development's Office of Minority Business Enterprise and Small Business Office.
- (d) Information received from the local Chamber of Commerce.

6.2 Outreach efforts will be made as follows:

- (a) The Administrator shall cultivate and maintain relationships with Small Business trade associations and business development organizations in an effort to locate and qualify capable Minority – Owned Businesses for participation in contracting opportunities.
- (b) The Administrator shall ensure that TDS assists Minority – Owned Businesses by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns.
- (c) The Administrator shall ensure that TDS provides adequate and timely consideration of the potentialities of Minority – Owned Businesses in “make or buy” decisions.
- (d) Appropriate members of management will attend seminars and trade fairs in order to develop sources.

7.0 PLAN REPORTING

7.1 TDS will submit such periodic reports and cooperate in those studies or surveys as may be required to determine the extent of compliance with this Plan.

7.2 TDS will maintain, if required, the following types of records:

- (a) Source lists, guides, and other data that identify Minority-Owned Businesses.
- (b) Lists of organizations contacted in an attempt to locate sources that are Minority - Owned Businesses.
- (c) Records of any outreach efforts to contact trade associations, business development organizations, and conferences and trade fairs attended.

7.3 TDS's Supplier Master List identifies Minority-Owned Businesses. The Supplier List shall be utilized in identifying potential contractors. A Summary Sheet shall be maintained in each suppliers file and shall be reviewed and evaluated by the Plan Administrator.

Appendix 11
Spring City Cable TV, Inc.

SPRING CITY CABLE

making connections >

April 17, 2018

Tennessee Regulatory Authority
ATTN: Jerry Kettles\
502 Deaderick St. 4th Floor
Nashville, TN 37243

Dear Mr. Kettles:

In accordance with T.C.A. Section 7-59-313 which requires holders of state-issued Certificates of Franchise Authority to submit an annual report each year to the Tennessee Regulatory Authority, please find the minority business participation plan for Spring City Cable TV, Inc. attached hereto.

If you should have any questions, please do not hesitate to contact me.

Very truly yours,



Walter E. Hooper III
President
Spring City Cable TV, Inc.

MINORITY-OWNED BUSINESS PARTICIPATION PLAN

1.0 PLAN

- 1.1 This Minority-Owned Business Plan (“Plan”) is submitted by Spring City Cable TV, Inc. (“Spring City Cable”) as required by the Competitive Cable & Video Service Act of 2008, codified as T.C.A. § 7-59-313.
- 1.2 The Administration of this Plan is the responsibility of Spring City Cable. It is the policy of Spring City Cable to provide an opportunity for Minority Owned Businesses to compete for subcontracts awarded by Spring City Cable on a fair and equitable basis with certified suppliers and contractors.
- 1.3 This plan is a state of objectives and is not intended to create any legal obligation of Spring City Cable of any person or organization.

2.0 DEFINITIONS

- 2.1 Minority Business – For the purpose of this Plan, “minority business” means a business that is solely owned, or at least fifty-one percent (51%) of the assets of outstanding stock of which is owned by an individual who personally manages and controls the daily operations of such business, and who is impeded from non-entry into the economic mainstream per T.C.A. § 7-59-313(1)(A-C).

3.0 PLAN RESPONSIBILITY AND POLICY STATEMENT

- 3.1 It is the policy of Spring City Cable to afford Minority-Owned Businesses an opportunity to participate in the performance of contracts in accordance with T.C.A. § 7-59-313(b).
- 3.2 As a purchase of goods and services, it is Spring City Cable’s responsibility to:
 - Identify and maintain a pool of qualified suppliers.
 - Provide opportunities for Minority Owned Businesses to bid in those solicitations for products or services which they are capable of providing, and which meet RUS (Rural Utility Service) standards.

4.0 PLAN PERIOD OF EFFECTIVENESS

- 4.1 Spring City Cable is committed to providing affirmative access to contracting opportunities for Minority-Owned Businesses. Spring City Cable is proactive and will move toward inclusion of such firms in the supplier base. This Plan represents an ongoing commitment by Spring City Cable and has no fixed time period for effectiveness.

5.0 PLAN ADMINISTRATION

5.1 Spring City Cable Plan Administrator is:

Walter Hooper
President & CEO
Spring City Cable TV, Inc.
140 Ellis Street
Spring City, Tennessee 37381
Telephone: (423) 365-7288
Fax: (423) 799-0900
Walter3@springcitycable.com

5.2 The Administrator manages the Plan as described below.

5.3 The Administrator's specific job duties, as they related to this Plan, are as follows:

- (a) Develop, establish and maintain policies and procedures to ensure Minority-Owned Businesses have an equitable opportunity to be awarded contracts.**
- (b) Ensure inclusion of Minority-Owned Businesses in those solicitations for products or services which they are capable of providing and which meet United States Department of Agricultural Rural Utility Service (RUS) standards.**
- (c) Maintain Minority-Owned Businesses related correspondence and record keeping.**
- (d) Coordinate activities during the conduct of any compliance review by Tennessee state agencies.**
- (e) Attend or arrange for attendance by appropriate members of management at Minority Business Enterprise Seminars, Trade Fairs and Conventions.**

6.0 PLAN TO ASSURE EQUITABLE OPPORTUNITY

6.1 The Administrator shall ensure appropriate source listings and services are properly utilized in support of the Plan. Sources/listings include, but are not limited to, the following:

- (a) The Spring City Cable approved Master Supplier List.**
- (b) Information received from the Small Business Administration Procurement Automated Source System (PASS).**
- (c) Information sources received from the Tennessee Department of Economic Development's Office of Minority Business Enterprise and Small Business Office.**
- (d) Information received from the local Chamber of Commerce.**

6.2 Outreach efforts will be made as follows:

- (a) The Administrator shall cultivate and maintain relationships with Small Business trade associations and business development organizations in an effort to locate and qualify capable Minority-Owned Businesses for participation in contracting opportunities.
- (b) The Administrator shall ensure Spring City Cable assists Minority-Owned Businesses by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns.
- (c) The Administrator shall ensure Spring City Cable provides adequate and timely consideration of the potentialities of Minority-Owned Businesses in “make or buy” decisions.
- (d) Appropriate members of management will attend seminars and trade fairs in order to develop sources.

7.0 PLAN REPORTING

7.1 Spring City Cable will submit periodic reports and cooperate in those studies or surveys as may be required to determine the extent of compliance with this Plan.

7.2 Spring City Cable will maintain, if required, the following types of records:

- (a) Source lists, guides and other data that identify Minority-Owned Businesses.
- (b) Lists of organizations contacted in an attempt to locate sources that are Minority-Owned Businesses.
- (c) Records of any outreach efforts to contact trade associations, business development organizations, and conferences and trade fairs attended.

7.3 Spring City Cable’s Supplier Master List identifies Minority-Owned Businesses. The Supplier Master List shall be utilized in identifying potential contractors. A summary sheet shall be maintained in each supplier’s file and shall be reviewed and evaluated by the Plan Administrator.

Appendix 12

United Communications



January 23, 2018

Tennessee Regulatory Authority
Attn: Mr. Jerry Kettles
Chief, Compliance Division
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Via email (jerry.kettles@tn.gov)

Re: Minority Owned Business Participation Plan Annual Report

Dear Mr. Kettles:

Please find the attached Minority Owned Business Participation Plan previously adopted by United Telephone Company (d/b/a United Communications) and its wholly-owned subsidiary, United Communications, Inc. (formerly UTC Video Concepts, LLC). There were no changes to this plan in 2017 and the plan remains in place.

Please let me know if you have any questions or need any additional information. I can be reached at 931.364.4329.

Best regards,

A handwritten signature in black ink that reads 'Lisa Hedgepeth'.

Lisa Hedgepeth
Warehouse/ Purchasing Agent

UNITED COMMUNICATIONS

120 Taylor Street | Chapel Hill, TN 37034

1.800.779.2227 | www.united.net



SMALL & MINORITY OWNED BUSINESS PARTICIPATION PLAN

Updated: June 2016

**SMALL AND MINORITY-OWNED BUSINESS
PARTICIPATION PLAN**

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- 1.0 PURPOSE
- 2.0 DEFINITIONS
- 3.0 POLICY STATEMENT AND ADMINISTRATION
- 4.0 RECORDS AND COMPLIANCE REPORTS

1.0 PURPOSE

- 1.1 United is committed to promoting and maintaining the purchase of goods and services from qualified small and minority-owned businesses, as defined herein. As a locally operated small business, we recognize the challenges of building and growing a small business and want to do our part to support other businesses serving our industry.
- 1.2 United is committed to meeting the obligations required by Section 16 of the Tennessee Telecommunications Act of 1995, codified as T.C.A. § 65-5-112. The purpose of §65-5-112 is to provide opportunities for small and minority-owned businesses to provide goods and services to Telecommunications service providers. United is committed to the goals of § 65-5-112 and to taking steps to support the participation of small and minority-owned Telecommunications businesses in the Telecommunications industry. United will endeavor to provide opportunities for small and minority-owned Telecommunications businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, United will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to United of such opportunities. Moreover, United will seek to increase awareness of such opportunities so that qualified companies not otherwise identified will have sufficient information to participate in the procurement process.
- 1.3 United is committed to meeting the obligations required by Public Chapter 932 of 2008, known as the Competitive Cable and Video Services Act (the “Act”), codified as T.C.A. § 7-59-318. Pursuant to T.C.A. § 7-59-313, as amended, United maintains a minority-owned business participation plan. The purpose of T.C.A. § 7-59-313 is to provide opportunities for minority-owned businesses to provide goods and services to video and cable service providers, United is committed to the goals of § 7-59-313 and to taking steps to support the participation of minority-owned businesses in the Telecommunications industry. United will endeavor to provide opportunities for minority-owned businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, United will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to United of such opportunities. Moreover, United will seek to increase awareness of such opportunities so that qualified companies not otherwise identified will have sufficient information to participate in the procurement process.
- 1.4 The Administration of this Plan is the responsibility of United. It is the policy of United to provide an opportunity for small and minority-owned businesses, as defined herein, to compete for subcontracts awarded by United on a fair and equitable basis with qualified suppliers and contractors.
- 1.5 This plan is a state of objectives and is not intended to create any legal obligations of United or any other person.

2.0 DEFINITIONS

- 2.1 **“United”** – For the purpose of this Plan, United shall include United Telephone Company, its wholly-owned subsidiary, United Communications, Inc. (formerly UTC Video Concepts, LLC) and UTC Long Distance, LLC.
- 2.2 **“Minority Owned Business”** – (as defined in T.C.A. § 65-5-112) “Minority-Owned Business” shall mean a business which is solely owned, or at least fifty-one percent (51%) of the outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or

national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000).

– (as defined in T.C.A. § 7-59-313) “Minority-Owned Business” additionally shall mean a business which is solely owned, or at least fifty-one percent (51%) of the outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of:

- A. Past practices of discrimination based on race, religion, ethnic background, or sex, including, but not limited, women;
- B. A disability as defined in T.C.A. § 4-26-102, including, but not limited to, disabled veterans; or
- C. Past practices of racial discrimination against African-Americans.

2.3 “**Small Business**” – (as defined in T.C.A. § 65-5-112) For the purpose of this Plan, “Small Business” means a business with annual gross receipts of less than four million dollars (\$4,000,000).

3.0 POLICY STATEMENT & ADMINISTRATION

- 3.1 It is the policy of United to afford Small Businesses and Minority-Owned Businesses and opportunity to participate in the performance of contracts in accordance with T.C.A. § 65-5-112 and T.C.A. § 7-59-313.
- 3.2 United’s Plan will be overseen and administered by the individual named below, which may change from time-to time, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting United’s full efforts to provide equal opportunities for Small Business and Minority-Owned Businesses.
- 3.3 The Administrator of the Plan will be:

Mrs. Lisa Hedgepeth
Purchasing Agent
120 Taylor Street
P. O. Box 38
Chapel Hill, Tennessee 37034
Telephone: 931.364.4329: Fax: 931.364.7202

- 3.4 The Administrator’s specific job duties, as they relate to this Plan are as follows:
 - A. Maintaining an updated plan in full compliance with T.C.A. § 65-5-112 and T.C.A. § 7-59-313 and the rules and orders of the Tennessee Regulatory Authority.
 - B. Establishing and developing policies and procedures for the successful implementation of the Plan.
 - C. Preparing and submitting such forms as may be required by the Tennessee Regulatory Authority, including the filing of required annual updates.
 - D. Serving as the primary liaison to and cooperate with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and

Small Businesses and Minority-Owned Businesses to locate and use qualified businesses as defined in T.C.A. § 65-5-112 and T.C.A. § 7-59-313.

- E. Searching for and developing opportunities to use Small Businesses and Minority-Owned Businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.
- F. Providing records and reports and cooperates in any authorized surveys as required by the Tennessee Regulatory Authority.
- G. Establishing a record-keeping system to track qualified Small Businesses and Minority-Owned Businesses and efforts to use such businesses.
- H. Providing information and educational activities to persons within United and training such persons to seek out, encourage, and promote the use of Small Businesses and Minority-Owned Businesses.

In performance of these duties, the Administrator will utilize a number of resources, including:

- Chambers of Commerce
- The Tennessee Department of Economic and Community Development
- The United States Department of Commerce
 - Small Business Administration
 - Office of Minority Business
- The National Minority Supplier Development Counsel
- The National Association of Women Business Owners
- The National Association of Minority Contractors
- Historically Black Colleges, Universities, and Minority Institutions

The efforts to promote and ensure equal opportunities for Small Business and Minority-Owned Business are primarily spelled out in the Administrator's duties above. Additional efforts will include offering technical assistance, where appropriate and feasible, to Small Businesses and Minority-Owned Businesses.

4.0 RECORDS AND COMPLIANCE REPORTS

- 4.1 United will maintain records of qualified Small Businesses and Minority-Owned Businesses and efforts to use such goods and services of such businesses. In addition, United will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this plan.
- 4.2 United will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. United will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

Appendix 13
West Kentucky Rural Telephone
Cooperative



January 29, 2018

Jerry Kettles
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Subject: Small and Minority-Owned Telecommunications Business Participation Plan

Dear Mr. Kettles:

Pursuant to §7-59-313 of the Tennessee Code, attached is the updated Small and Minority-Owned Telecommunications Business Participation Plan for West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a/ WK&T.

Sincerely,

Karen Jackson-Furman
Chief Operating Officer

237 North 8th Street – Mayfield, KY 42066
1-877-954-8748
www.mywkt.net

WEST KENTUCKY RURAL TELEPHONE
COOPERATIVE CORPORATION, INC.
dba WK&T

SMALL AND MINORITY – OWNED
TELECOMMUNICATIONS
BUSINESS PARTICIPATION PLAN

Pursuant to T.C.A. 65-5-212, as amended, West Kentucky Rural Telephone Cooperative Corporation, Inc. submits this small and minority-owned Telecommunications business participation plan (the “Plan”).

I. PURPOSE

The purpose of 65-5-212 is to provide opportunities for small and minority-owned businesses to provide goods and services to Telecommunications service providers. WK&T is committed to the goals of 65-5-212 and to taking steps to support the Telecommunications industry. WK&T will endeavor to provide opportunities for small and minority-owned Telecommunications businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, WK&T will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to WK&T. WK&T will seek to increase awareness of such opportunities so that companies will have sufficient information to participate in the procurement process.

II. DEFINITIONS

As defined in 65-5-212.

Minority-Owned Business. Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from the normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000).

Small Business. Small Business shall mean a business with annual gross receipts of less than four million dollars (\$4,000,000).

III. ADMINISTRATION

WK&T's Plan will be overseen and administered by the individual named below, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Karen Jackson-Furman, COO
West Kentucky Rural Telephone Cooperative Corporation, Inc. (dba WK&T)
237 North 8th Street
Mayfield, Kentucky 42066
Telephone: 270-856-1000
Facsimile: 270-856-3035

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with 65-5-212 and the rules and orders of the Tennessee Regulatory Authority.
- (2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.
- (3) Preparing and submitting such forms as may be required by the Tennessee Regulatory authority, including the filing of required annual updates.
- (4) Serving as the primary liaison to and cooperate with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and small and minority-owned businesses to locate and use qualified small and minority-owned businesses as defined in 65-5-212.
- (5) Searching for and developing opportunities to use small and minority-owned businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.
- (6) Providing records and reports and cooperate in any authorized surveys as required by the Tennessee Regulatory Authority.
- (7) Establishing a record-keeping system to track qualified small and minority-owned businesses and efforts to use such businesses.

In performance of these duties, the Administrator will utilize a number of resources, including,

Chambers of Commerce

The Tennessee Department of Economic and Community Development

The United States Department of Commerce

Small Business Administration

Office of Minority Business

The National Minority Supplier Development Counsel

The National Association of Women Business Owners

The National Association of Minority Contractors

Historically Black Colleges, Universities and Minority Institutions

The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, small and minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

IV. RECORDS AND COMPLIANCE REPORTS

WK&T will maintain records of qualified small and minority-owned business and efforts to use the goods and services of such businesses. In addition, WK&T will submit records and reports required by the Tennessee Regulatory Authority concerning the plan. Moreover, WK&T will cooperate fully with any surveys and studies required by the Tennessee Regulatory authority.

West Kentucky Rural Telephone Cooperative Corporation, Inc.

By: Karen Jackson-Furman

WK&T- Chief Operating Officer

January 2018

Appendix 14
Millington CATV



phone 870.336.3434

1.888.336.4249

fax 870.336.3401

office 2400 Ritter Drive, Jonesboro, AR 72401

January 30, 2018

Tennessee Regulatory Authority
ATTN: Jerry Kettles
502 Deadrick Street, 4th Floor
Nashville, TN 37243

RE: Minority-Owned Business Participation Plan

Dear Mr. Kettles:

Millington CATV, Inc., dba Ritter Communications (Company) hereby submits this original and one copy of its Minority Owned Business Participation Plan in accordance with Tenn. Code Ann. § 7-59-313.

The Company maintains a list of qualified suppliers, and has identified among them, those suppliers which are Minority-Owned or Woman-Owned. Those qualified suppliers are afforded the opportunity to bid, in an equitable manner, on solicitations for which the supplier is qualified to provide the goods or services in question.

The Plan Administrator, Jeff Shipman is involved in outreach activities to identify qualified suppliers by utilizing many resources, including local Chambers of Commerce, the Tennessee Department of Economics and Community Development, National Associations for Women and Minority Business owners, and ongoing training. In 2017, the Company paid Minority-Owned businesses \$26,600 dollars.

The Company will comply with this Plan and look for ways to increase its contacts and partnerships with Minority-Owned suppliers.

If you have any questions, feel free to contact me at 870-336-2345 or john.strode@rittercommunications.com.

Sincerely,

Ritter Communications Holdings

A handwritten signature in black ink that reads "John Strode".

John Strode
Vice President

Millington CATV, Inc.

**MINORITY-OWNED
BUSINESS PARTICIPATION PLAN**

Millington CATV, Inc.

**MINORITY-OWNED
BUSINESS PARTICIPATION PLAN**

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**MINORITY-OWNED BUSINESS
PARTICIPATION PLAN**

1.0 PLAN

- 1.1 This Minority-Owned Business Participation Plan (“Plan”) is submitted by Millington CATV, Inc. (“Millington), as required by the Competitive Cable & Video Service Act of 2008, relevant provisions of which are codified at Tenn. Code Ann. § 7-59-313.
- 1.2 The Administration of this Plan is the responsibility of Millington. It is the policy of Millington to provide an opportunity for Minority-Owned Businesses to compete for subcontracts awarded by Millington on a fair and equitable basis with certified suppliers and contractors.
- 1.3 This Plan is a statement of objectives and is not intended to create any legal obligation on behalf of Millington or any person or organization

2.0 DEFINITIONS

- 2.1 **Minority Business:** For the purpose of this Plan, “Minority-Owned Business” means a business that is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of such business, and who is impeded from non-entry into the economic mainstream as defined in Tenn. Code Ann. § 7-59-313(a)(1)(A-C).

3.0 PLAN RESPONSIBILITY AND POLICY STATEMENT

- 3.1 It is the policy of Millington to afford Minority-Owned Businesses an opportunity to participate in the performance of contracts in accordance with T.C.A. 7-59-313(b).
- 3.2 As a purchaser of goods and services, it is Millington’s responsibility to:
 - (a) Identify and maintain a pool of qualified suppliers.
 - (b) Provide opportunities for Minority-Owned Businesses to bid in those solicitations for products or services which they are capable of providing, and which meet RUS (Rural Utility Service) standards.

4.0 PLAN PERIOD OF EFFECTIVENESS

- 4.1 Millington is committed to providing affirmative access to contracting opportunities for Minority-Owned Businesses. Millington is proactive and will move toward inclusion of such firms in the supplier base. This plan represents an ongoing commitment by Millington, and has no fixed time period for effectiveness.

5.0 PLAN ADMINISTRATION

- 5.1 Millington's Plan Administrator is:

Mr. Jeff B. Shipman
PO Box 17040
Jonesboro, AR 72403
Phone: 870-336-3480

- 5.2 The Administrator manages the Plan as described below.
- 5.3 The Administrator's specific job duties, as they relate to this Plan are as follows:
- (a) Develops and maintains policies and procedures to ensure that Minority-Owned Businesses have an equitable opportunity to be awarded contracts.
 - (b) Establishes and maintains policies and procedures to ensure that Minority-Owned Businesses have an equitable opportunity to be awarded contracts.
 - (c) Ensures inclusion of Minority-Owned Businesses in those solicitations for products or services which they are capable of providing.
 - (d) Maintains Minority-Owned Business related correspondence and record keeping.
 - (e) Coordinates activities during the conduct of any compliance review by the Tennessee state agencies.
 - (f) Attends or arranges for attendance by appropriate members of management at Minority Business Enterprise Seminars, Trade Fairs, and Conventions.

6.0 PLAN TO ASSURE EQUITABLE OPPORTUNITY

- 6.1 The Administrator shall ensure that appropriate source listings and services are properly utilized in support of the Plan. Sources/listings include, but are not limited to the following:
- (a) The Millington-approved Master Supplier list.

- (b) Information received from the Small Business Administration Procurement Automated Source System (PASS).
- (c) Information sources received from the TN Department of Economic Development's Office of Minority Business Enterprise and Small Business Office.
- (d) Information received from the local Chamber of Commerce.

6.2 Outreach efforts will be made as follows:

- (a) The Administrator shall cultivate and maintain relationships with Small Business trade associations and business development organizations in an effort to locate and qualify capable Minority-Owned Businesses for participation in contracting opportunities.
- (b) The Administrator shall ensure that Millington assists Minority-Owned Businesses by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns.
- (c) The Administrator shall ensure that Millington provides adequate and timely consideration of the potentialities of Minority-Owned Businesses in "make or buy" decisions.
- (d) Appropriate members of management will attend seminars and trade fairs in order to develop sources.

7.0 PLAN REPORTING

- 7.1 Millington will submit such periodic reports and cooperate in those studies or surveys as may be required to determine the extent of compliance with this Plan.
- 7.2 Millington will maintain, if required, the following types of records:
 - (a) Source lists, guides, and other data that identify Minority-Owned Businesses.
 - (b) Lists of organizations contacted in an attempt to locate sources that are Minority-Owned Businesses.
 - (c) Records of any outreach efforts to contact trade associations, business development organizations, and conferences and trade fairs attended.

7.3 Millington's Supplier Master List identifies Minority-Owned Businesses. The Supplier List shall be utilized in identifying potential contractors. A Summary Sheet shall be maintained in each supplier's file and shall be reviewed and evaluated by the Plan Administrator.


FURTHER AFFIANT SAYETH NOT.



Jeff B. Shipman

State of ~~Tennessee~~ ^{Arkansas})
County of ~~Shelby~~ ^{Craighead})

Sworn to and subscribed before me, this 1st day of February, 2018.



Notary Public

My Commission Expires: 09.10.18

PEGGY B. PIETZ
CRAIGHEAD COUNTY
NOTARY PUBLIC - ARKANSAS
MY COMMISSION # IS 12367655
MY COMMISSION EXPIRES 09-10-18

Appendix 15
Community Television Company

- Ellijay Telephone Company
- Community Television Company
- ETC Communications, LLC.



P.O. Box O
224 Dalton St.
Ellijay, Georgia 30540

706.276.2271 800.660.6826
Fax: 706.276.9888 etcnow.com

January 29, 2018

Via email Jerry.Kettles@tn.gov

Tennessee Regulatory Authority
Attention: Jerry Kettles
502 Deaderick Street, 4th Floor
Nashville, TN 37243

**RE: Community Television Company (CTC);
2017 Annual Report on Minority-Owned Business Participation Plan as
required by the Competitive Cable and Video Services Act,
Tenn. Code Ann. § 7-59-301, et seq. (Act)**

Dear Mr. Kettles:

In accordance with section 7-59-313(d) of the Competitive Cable and Video Services act, we submit this annual report concerning CTC's Minority-Owned Business Participation Plan and compliance with that plan.

CTC received its state-issued certificate of franchise authority in August, 2013. See *In Re: Application of Community Television Company for a State-Issued Certificate of Franchise Authority*, Certificate of Franchise Authority, Docket No. 13-00101 (Aug. 2, 2013). As required by the Act, CTC's application contained its Minority-Owned Business Participation Plan. Tenn Code Ann. § 7-59-305(c)(11).

CTC implemented that plan and is in compliance with it. For your records, we enclose a copy of the plan, which has not changed since we submitted it.

Warm Regards,

A handwritten signature in black ink that reads "Cora Payne". The signature is written in a cursive, flowing style.

Cora Payne
Administration Department Manager

Enclosure

**Community Television Company (CTC)
Minority-Owned Business Participation Plan**

Pursuant to Section 7-59-313 of the Competitive Cable and Video Services Act, this Minority-Owned Business Participation Plan (Plan) sets forth CTC's plan to actively solicit bids from, and let contracts to, minority-owned businesses when establishing, providing, or expanding cable services and related support facilities.

- 1) **Minority-Owned Business.** "Minority-Owned Business" means a business that is solely owned, or at least 51% of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of the business and who is impeded from normal entry into the economic mainstream because of:
 - (a) Past practices of discrimination based on race, religion, ethnic background, or sex, including, but not limited to, women;
 - (b) A disability as defined in T.C.A. § 4-26-102, including, but not limited to, disabled veterans; or
 - (c) Past practices of racial discrimination against African-Americans.

- 2) **CTC Supplier Diversity Policy Statement.** It is the policy of CTC to promote the purchase of goods and services from Minority-Owned Businesses. Maximum practicable opportunity shall be given to Minority-Owned Businesses to participate as suppliers of material and services to CTC. CTC also encourages subcontracting opportunities for Minority-Owned Businesses.

- 3) **CTC's Promotion of Opportunities for Minority-Owned Businesses.** CTC's management, procurement, and human resources personnel work to identify goods and services that may be supplied by Minority-Owned Businesses. When possible, CTC seeks proposals, and makes purchases, from qualified Minority-Owned Businesses. CTC also seeks to foster relationships within Minority-Owned Business communities.

- 4) **Information on Programs to Provide Technical Assistance to Minority-Owned Businesses.** CTC provides information for Minority-Owned Businesses upon request.

- 5) **Statement of Intent to Follow this Plan.** Under the plan, CTC shall: (i) endeavor to maximize participation of Minority-Owned Businesses and (ii) aim to achieve a level of Minority-Owned Business participation representative of the population of the demographics of the state of Tennessee.

By January 31 of each year, CTC will prepare and submit an annual report to the TRA concerning CTC's Minority-Owned Business Participation Plan and compliance with the Plan.

Appendix 16

Infostructure, Inc. dba ClickOne.Net

CLICK1.NET

Broadband Now.

February 5th, 2018

Mr. Jerry Kettles
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

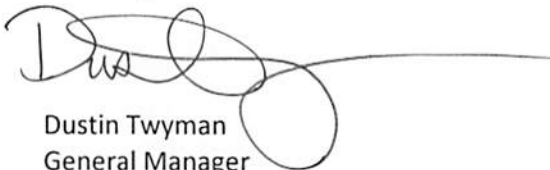
Dear Mr. Kettles,

Enclosed is InfoStructure Inc.'s (dba Click1.net) Minority Vendor Outreach program for 2018.

1. We will send the Minority Status Request Form to existing vendors to determine their Minority status.
2. We will contact the local agencies identified in the attached Outreach List to ask for their assistance in identifying minority vendors and suppliers.
3. We will send the Minority Vendor Program Letter to certified Minority vendors supplied to us by the Tennessee Department of Economic and Community Development and other local agencies.

If you have any questions regarding these documents please feel free to call me @ 731-217-0666

Sincerely,



Dustin Twyman
General Manager
314 N 22nd Ave
Humboldt, TN 38343

Attachments: Minority Status Request Form
Outreach List
Minority Vendor Program Letter
Local Agency Outreach Program Cover Letter

Vendor Information

Physical Address:

Name

Address

City

State

Zip

Phone #

Email Address

Briefly Describe Services Offered by Vendor

Type of Business (check one):

Individual

Partnership

Corporation

Minority Status:

African American

Asian Indian

Asian Pacific

Hispanic

Native American

Caucasian

Male

Female

Male	Female

N/A

Signature:

Printed Name

Title:

Date



Infostructure, Inc. (dba Click1.net) Minority Vendor Outreach Program
Local Agency Outreach List

1. Tennessee Department of Economic and Community Development
312 8th Ave N Nashville TN 37243
2. Humboldt Chamber of Commerce 1200 Main St. Humboldt, TN 38343
3. Greater Gibson County Area Chamber of Commerce 200 E. Eaton Street
Trenton, TN 38382
4. NAACP in Humboldt/Jackson 27 Brentshire Square Jackson, TN 38301
5. African-American Chamber of Commerce 351 N. Royal St. Jackson, TN
38301
6. Morning Star Missionary Baptist Church 1111A W Mitchell St. Humboldt,
TN 38343
7. St James Baptist Church 701 Main St. Humboldt, TN 38343

CLICK1.NET

Broadband Now.

Date

Dear [Future Vendor/Supplier],

InfoStructure Inc. (DBA Click1.net) desires to conduct business with a diverse range of qualified vendors and suppliers in our community. Your company has been identified to us as a minority/female-owned business who may be a potential vendor/supplier for Click1.net. If you are interested in being considered as a potential vendor/supplier, please fill out the enclosed form and documents and return it to:

Click1.net
Attn: Dustin Twyman
General Manager
314 N 22nd Ave
Humboldt, TN 38343

We look forward to your response.

Sincerely,

Dustin M Twyman
Technical Operations Manager
InfoStructure Inc. (DBA Click1.net)

CLICK1.NET

Broadband Now.

Dear Sir,

Infostructure has developed an outreach plan for minority vendors and suppliers in accordance with the State of Tennessee Competitive Cable and Video Services Act T.C.A. § 7-59-313(d). As an element of this plan InfoStructure is contacting you to request information regarding minority vendors and suppliers in our area. We respectfully request your assistance in completing and returning the enclosed documents at your earliest convenience.

InfoStructure Inc.
Dustin Twyman
General Manager
314 N 22nd Ave
Humboldt, TN 38343

Appendix 17

Google Fiber



January 30, 2018

Tennessee Regulatory Authority
Jerry Kettles
460 James Robertson Parkway
Nashville, TN 37243

RE: Google Fiber Tennessee, LLC's Minority Business Plan Annual Report

Dear Mr. Jerry Kettles,

In accordance with section § 7-59-305(11) of the Competitive Cable and Video Services Act, Google Fiber Tennessee, LLC ("Google Fiber") provides this annual report on its Minority Owned Business Participation Plan and compliance with this plan.

Google Fiber continues to comply with its Minority-Owned Business Participation Plan.

Sincerely,

A handwritten signature in blue ink, appearing to be "Jill Szuchmacher".

Jill Szuchmacher
Manager, Google Fiber Inc.



Exhibit A

Compliance of Minority Owned Business Participation Plan

Google Fiber has developed policies and procedures necessary for successful implementation of its plan. Google Fiber is maximizing participation of minority-owned businesses through both prime and second-tier business contracting opportunities by:

1. Identifying a pool of minority owned businesses through the Governor's Office of Diversity Business and Google Inc.'s supplier diversity database. Encouraging minority-owned business to participate in bids on contracts and subcontract. In 2017, Google Fiber's two largest suppliers were woman-owned and veteran-owned.
2. Encouraging prime suppliers to increase minority-owned business participation in their subcontractor selection process, promotion of minority-owned business opportunities, and use goods and services supplied by minority-owned businesses. In 2017, Google Fiber's two largest suppliers were woman-owned and veteran-owned.
3. Develop opportunities to partner with or utilize the services of minority-owned businesses by leveraging Google Inc.'s established Small Business Supplier Diversity Program for minority-, women-, veteran- and LGBT-owned small businesses of \$15M or less and fewer than 50 employees. Further details regarding this program can be found at <https://www.google.com/diversity/suppliers/>
4. Tracking qualified minority-owned business participation by requesting prime suppliers provide reporting on minority-owned Tier 2 and subcontract engagements. In 2017, Google Fiber's two largest suppliers were woman-owned and veteran-owned.



Exhibit B

Google Fiber Tennessee, LLC's Minority-Owned Business Participation Plan

Pursuant to T.C.A. § 7-59-305(11), Google Fiber Tennessee, LLC ("Google Fiber") submits this minority-owned business participation plan for actively soliciting bids from minority-owned businesses and letting contracts to such businesses when establishing, providing, or expanding video services and related support facilities. As addressed in more detail below, Google Fiber strives to maximize participation of minority-owned businesses through both prime and second-tier business contracting opportunities and strives to achieve a level of minority-owned business participation representative of the population demographics of the state.

Definitions

For the purposes of this plan, unless the context otherwise requires:

1. "Minority-owned business" means a business that is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of the business and who is impeded from normal entry into the economic mainstream because of:
 - A. Past practices of discrimination based on race, religion, ethnic background or sex, including, but not limited to, women;
 - B. A disability as defined in T.C.A. § 4-26-102, including, but not limited to, disabled veterans; or
 - C. Past practices of racial discrimination against African Americans; and
2. "Minority-owned business participation plan" means a business plan for actively soliciting bids from minority-owned businesses and letting contracts to such businesses when establishing, providing or expanding cable¹ or video services and related support facilities. The plan shall include the following information:
 - A. A proposal for purchasing goods and services from minority-owned businesses;

¹ Google Fiber provides video services, not cable services.



- B. Information on programs to provide technical assistance to such businesses; and
- C. A statement of intent to follow its minority-owned business participation plan.

Google Fiber's Diversity Policy Statement

Google Fiber is a second-level (through Google Fiber Inc.), wholly-owned subsidiary of Google Inc., a Fortune 500 company. Google Inc. is one of the leading technology companies in the world. Google Inc. has a longstanding commitment to provide and expand opportunities for minorities and minority-owned businesses. For example, Google Inc. has established training programs to teach minority-owned businesses how to market themselves and generate business leads. Additionally, it also offers internships and scholarships for minority students to train them in various technology fields, including computer science, and offers additional programs to expose students to the technology industry. A major objective of these internships and programs is to increase diversity within Google Inc. and its subsidiaries and the technology industry as a whole.

Google Fiber, like Google Inc., is committed to affording opportunities for minority-owned businesses. Specifically, Google Fiber is committed to the goals of T.C.A. § 7-59-313 and to taking steps to support and increase the participation of minority-owned businesses in the provision of video services and related support facilities. Google Fiber provides opportunities for such businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, Google Fiber makes efforts to identify and inform qualified minority-owned businesses of opportunities to supply goods and services to Google Fiber. Furthermore, Google Fiber seeks to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

Proposal For Purchasing Goods And Services From Minority-Owned Businesses

Google Fiber seeks to make available opportunities for minority-owned business suppliers. David Lish, Manager of Supply Chain Operations, will oversee and administer the plan and will be responsible for promoting Google Fiber's efforts to provide opportunities for minority-owned businesses. The Google Fiber team has developed policies and procedures necessary for successful implementation of the plan. Google Fiber will continue to search for and develop opportunities to partner with or utilize the services of minority-owned businesses and encourage such businesses to participate in and bid on contracts and subcontracts. Google Fiber tracks qualified minority-owned businesses and seek to use the goods and services of such businesses. Google Fiber also works to provide information and educational activities to train



Google Fiber's employees to identify, encourage, and promote the use of minority-owned businesses.

Google Fiber recognizes that its suppliers play an important role in offering subcontracts and other opportunities to minority-owned businesses and members of historically disadvantaged communities. Google Fiber emphasizes with all of its suppliers its expectations that the suppliers will work to increase diversity in hiring, promote minority-owned business opportunities, and use goods and services supplied by minority-owned businesses. Google Fiber assists them in identifying such companies and business opportunities.

To reach minority-owned businesses and to support and increase the participation of minority-owned businesses in the provision of video services and related support facilities, Google Fiber uses the list compiled by the Governor's Office of Diversity Business and may collaborate with a number of third party or community organizations.

Information About Programs To Provide Technical Assistance To Minority-Owned Businesses

As mentioned above, Google Fiber provides information about business openings, prospects, training and education programs, and other initiatives of interest to minority-owned businesses. Additionally, Google Fiber works with various third party and community organizations to provide support for training and development of minority-owned businesses.

Statement Of Intent To Follow Its Minority-Owned Business Participation Plan and File Annual Reports

Google Fiber agrees to comply with the provisions of this plan in accordance with T.C.A. § 7-59-313. Specifically, Google Fiber strives to maximize participation of minority-owned businesses through both prime and second-tier business contracting opportunities. Google Fiber also strives to achieve a level of minority-owned business participation representative of the population demographics of the state.

In accordance with T.C.A. § 7-59-313(d), by January 31 of each year, Google Fiber will prepare and submit an annual report to the Tennessee Regulatory Authority concerning the status of Google Fiber's minority-owned business participation plan and compliance with the plan.



Any questions about this plan may addressed to:

Daynise Joseph

Community Impact Manager - Nashville

Google Fiber Tennessee, LLC

1101 McGavock St Suite 200

Nashville, TN 37203

Appendix 18
Trenton TV Cable Company



January 16, 2018

Via First Class Mail and email
jerry.kettles@tn.gov

Tennessee Public Utility Commission
Attn: Jerry Kettles
502 Deaderick Street
4th Floor
Nashville, TN 37243

**Re: Trenton TV Cable Company; Annual Report on Compliance With Minority-
Owned Business Participation Plan**

Dear Mr. Kettles:

Pursuant to the requirements of Tenn. Code Ann. § 7-59-313, Trenton TV Cable Company ("Trenton TV Cable" or "the company") provides this annual report concerning Trenton TV Cable's Minority-Owned Business Participation Plan and Trenton TV Cable's compliance with that plan.

Trenton TV Cable was granted its certificate of franchise authority on January 11, 2016. A copy of the company's Minority-Owned Business Participation Plan was filed as part of that application and is included here.

Trenton TV Cable certifies that the company continues to comply with the attached Minority-Owned Business Participation Plan.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Elizabeth Cuttner
Counsel to Trenton TV Cable Company

Enclosures

cc: Steve Nowell, Trenton TV Cable Company, President
Jerry Kettles, Tennessee Public Utility Commission, Director - Economic Analysis and Policy
Division

**Trenton TV Cable Company (“Trenton TV Cable”)
Minority-Owned Business Participation Plan**

Pursuant to Section 7-59-313 of the Competitive Cable and Video Services Act, this Minority-Owned Business Participation Plan (“Plan”) sets forth Trenton TV Cable’s plan to actively solicit bids from, and let contracts to, minority-owned businesses when establishing, providing, or expanding cable services and related support facilities.

- 1) **Minority-Owned Business.** “Minority-Owned Business” means a business that is solely owned, or at least 51% of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of the business and who is impeded from normal entry into the economic mainstream because of:
 - (a) Past practices of discrimination based on race, religion, ethnic background, or sex, including, but not limited to, women;
 - (b) A disability as defined in T.C.A. § 4-26-102, including, but not limited to, disabled veterans; or
 - (c) Past practices of racial discrimination against African-Americans.

- 2) **Trenton TV Cable Supplier Diversity Policy Statement.** It is the policy of Trenton TV Cable to promote the purchase of goods and services from Minority-Owned Businesses. Maximum practicable opportunity shall be given to Minority-Owned Businesses to participate as suppliers of material and services to Trenton TV Cable. Trenton TV Cable also encourages subcontracting opportunities for Minority-Owned Businesses.

- 3) **Trenton TV Cable’s Promotion of Opportunities for Minority-Owned Businesses.** Trenton TV Cable’s management, procurement, and human resources personnel work to identify goods and services that may be supplied by Minority-Owned Businesses. When possible, Trenton TV Cable seeks proposals, and makes purchases, from qualified Minority-Owned Businesses. Trenton TV Cable also seeks to foster relationships within Minority-Owned Business communities.

- 4) **Information on Programs to Provide Technical Assistance to Minority-Owned Businesses.** Trenton TV Cable provides information for Minority-Owned Businesses upon request.

- 5) **Statement of Intent to Follow this Plan.** Under the plan, Trenton TV Cable shall: (i) endeavor to maximize participation of Minority-Owned Businesses and (ii) aim to achieve a level of Minority-Owned Business participation representative of the population of the demographics of the state of Tennessee.

By January 31 of each year, Trenton TV Cable will prepare and submit an annual report to the TRA concerning Trenton TV Cable’s Minority-Owned Business Participation Plan and compliance with the Plan.

Appendix 19

Crystal Clear Technologies



Crystal Clear
Fiber Optic Broadband Provider

March 6, 2018

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

To Whom It May Concern:

Please find enclosed the Minority Owned Business Plan previously established by Crystal Clear Technologies, LLC. This plan was enacted to conform with the requirements of Tennessee Code Annotated 7-59-301 through 7-59-318. It was established in 2016 and is still in effect as policy of the company.

Sincerely,

Lucas Sullivan
General Manager
Crystal Clear Technologies, LLC

621 Bradley Court, Franklin, TN 37067 Phone: 615-550-4600 Fax: 615-661-7747

www.crystalclearfiber.com

Crystal Clear, LLC
Minority Owned Business Participation Plan

PURPOSE:

The purpose of the Minority-Owned Telecommunications Business Participation Plan ("Plan") of Crystal Clear, LLC ("Crystal Clear") is to identify minority-owned telecommunications businesses in Tennessee that are qualified to provide goods and services to Crystal Clear, and to promote awareness among these entities of the opportunities to develop business relationships with Crystal Clear in those areas in Tennessee in which Crystal Clear provides telecommunications services.

DEFINITIONS:

"Minority Business" – For the purpose of this Plan, "minority business" means a business that is solely owned, or at least fifty-one percent (51%) of the assets of outstanding stock of which is owned by an individual who personally manages and controls the daily operations of such business, and who is impeded from non-entry into the economic mainstream per T.C.A. § 7-59-313(1) (A-C).

POLICY STATEMENT:

Crystal Clear acknowledges the importance of supporting the participation of minority-owned telecommunications businesses in the telecommunications industry in Tennessee and throughout the United States.

Crystal Clear acknowledges its responsibility, wherever feasible, to provide minority-owned telecommunications businesses with an opportunity to compete for contracts and subcontracts to supply goods and services to Crystal Clear in those areas in which Crystal Clear is providing telecommunications services. Meeting this responsibility involves the identification and selection of qualified minority-owned telecommunications businesses that may wish to contract with Crystal Clear for purposes of supplying Crystal Clear's Tennessee operations with goods and services relating to the field of telecommunications. It also involves provision of information on programs, if any, to provide technical assistance to minority-owned telecommunications businesses when these are made available in Tennessee.

IMPLEMENTATION OF PLAN:

Where feasible and appropriate, Crystal Clear will invite bids, issue requests for proposals, or otherwise solicit offers from minority-owned telecommunications businesses to furnish specified goods or services to Crystal Clear in furtherance of its Tennessee operations.

except in the case of emergencies, or in such cases where Crystal Clear is bound by contract to purchase goods and services from other sources.

ADMINISTRATION OF PLAN:

In conducting its business affairs in Tennessee, Crystal Clear will appoint one of its employees as the Administrator of the Plan. The Administrator will steer the process by which Crystal Clear will identify and utilize available resources for identifying minority-owned telecommunications businesses interested in and qualified to furnish goods and services to Crystal Clear in Tennessee, as Crystal Clear's needs arise. The Administrator also will oversee the task of cultivating an awareness among such business entities with respect to potential opportunities to develop business relations with Crystal Clear.

The Administrator will endeavor to serve as a resource for technical assistance to minority-owned telecommunications business, and will refer such businesses to sources of information and technical assistance, internal and external, where feasible.

PLAN ADMINISTRATOR:

The administration of this Plan will be under the direction of (hereinafter called the "Administrator"):

Lucas Sullivan
621 Bradley Court
Franklin, Tennessee 3
(615) 550-4600

The duties of the Administrator include the following:

1. To manage the development of Crystal Clear's policies and procedures relating to the Plan.
2. To oversee the identification and development of opportunities to use qualified minority-owned telecommunications businesses to participate in and bid on contracts and subcontracts to supply goods and services to Crystal Clear by utilizing the following resources, where available:
 - a. The United States Department of Commerce, Office of Minority Business Data Center, the Small Business Administration and its Procurement Automated Source System ("PASS") and its Office of Minority Small Business and Capital Ownership Development; the Tennessee Chamber of Commerce; the Tennessee Department of Economic and Community Development; the National Minority Supplier Development Counsel; the National Association of Women Business Owners; the National Association of Minority Contractors.
 - b. Local and national associations, and minority supplier development councils.

- c. Trade fairs and industry meetings.
 - d. Advertisement in industry and local publications.
 - e. Historically Black Colleges, Universities, and Minority Institutions.
3. To establish and maintain an updated Plan and related documentation that are consistent with the current rules, orders and policies of the Tennessee Regulatory Authority regarding small and minority-owned telecommunications businesses, and that are in full compliance with TENN. CODE ANN. § 65-5-212.
 4. To prepare and submit such information and documentation as may be required by the Tennessee Regulatory Authority.
 5. To cooperate with the Tennessee Regulatory Authority and with other agencies of the State of Tennessee to find and utilize, where possible, the qualified business entities defined herein.
 6. To facilitate activities for assisting potential buyers in locating and qualifying the types of business concerns identified herein.
 9. To cooperate in any authorized surveys by the Tennessee Regulatory Authority.
 10. To educate Crystal Clear personnel with respect to their responsibility to seek out, encourage, and promote the use of minority-owned telecommunications businesses.

COMPLIANCE REPORTS:

Crystal Clear will submit such reports as may be required for use in connection with subcontracting plans by the Tennessee Regulatory Authority and/or the State of Tennessee. Crystal Clear will cooperate to the fullest extent possible with all reasonable and appropriate surveys or studies required by the contracting agency for purposes of determining compliance with the State's minority-owned telecommunications business participation program. However, Crystal Clear reserves the right to designate any documents, reports, surveys, studies or information submitted for this purpose as "confidential" or "proprietary."

RECORD MAINTENANCE:

Crystal Clear will maintain records relating to its Minority-Owned Telecommunications Business Participation Plan for purposes of evidencing the Company's implementation of this policy, for use by Crystal Clear in evaluating the effectiveness and in achieving the goals of its Plan, and for the Company's use in updating the Plan on an annual basis with the Tennessee Regulatory Authority, or as otherwise required.

Appendix 20

Spirit Broadband



January 31, 2018

Mr. Jerry Kettles
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Dear Mr. Kettles,

In accordance with the reposting requirements of section § 7-59-313(d) of the Tenn. Code, Spirit Broadband is submitting the attached annual report concerning its minority owned business participation plan and compliance with the plan.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Vincent A. King
President

PO Box 2647
Brentwood, TN 37046
p 615-815-1600
www.spiritbb.com

SPIRIT BROADBAND, LLC
MINORITY-OWNED BUSINESS PARTICIPATION PLAN

Pursuant to Section 7-59-313 of the Competitive Cable and Video Services Act, this Minority-Owned Business Participation Plan (Plan) sets forth Spirit Broadband, LLC's (hereinafter referred to "SBB") plan to actively solicit bids from, and let contracts to, minority owned businesses when establishing, providing, or expanding cable services and related support facilities.

- 1) **Minority-Owned Business.** "Minority-Owned Business" means a business that is solely owned, or at least 51% of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of the business and who is impeded from normal entry into the economic mainstream because of:
 - a. Past practices of discrimination based on race, religion, ethnic background, or sex, including, but not limited to, women;
 - b. A disability as defined in T.C.A. 4-26-102, including, but not limited to, disabled veterans; or
 - c. Past practices of racial discrimination against African-Americans.
- 2) **SBB Supplier Diversity Policy Statement.** It is the policy of SBB to promote the purchase of goods and services from Minority-Owned Businesses. Maximum practicable opportunity shall be given to Minority-Owned Businesses to participate as suppliers of material and services to SBB. SBB also encourages subcontracting opportunities for Minority-Owned Businesses.
- 3) **SBB's Promotion of Opportunities for Minority-Owned Businesses.** SBB's Management, procurement, and human resources personnel work to identify goods and services that may be supplied by Minority-Owned Businesses. When possible, SBB seeks proposals, and makes purchases, from qualified Minority-Owned Businesses. SBB also seeks to foster relationships within Minority-Owned Business communities.
- 4) **Information on Programs to Provide Technical Assistance to Minority-Owned Businesses.** SBB provides information form Minority-Owned Businesses upon request.
- 5) **Statement of Intent to Follow this Plan.** Under the plan, SBB shall: (i) endeavor to maximize participation of Minority-Owned Businesses and (ii) aim to achieve a level of Minority-Owned Business participation representative of the population of the demographics of the state of Tennessee.

By January 31 of each year, SBB will prepare and submit an annual report to the TRA concerning SBB's Minority-Owned Business Participation Plan and compliance with the Plan.