Competitive Cable & Video Services Act

Minority Owned Business Participation Plan Report for 2014

Tennessee Regulatory Authority
August 2015
August 26, 2015

The Honorable Bill Haslam  
Governor  
Joe McCord  
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 2014. Please feel free to contact me with any questions.

Sincerely,

[Signature]

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).

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.”

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.”

Annual Review

Tenn. Code Ann. § 7-59-313(d) requires the Tennessee Regulatory Authority 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 2014, the Tennessee Regulatory Authority had granted sixteen state-issued certificates of franchise authority. The TRA granted a state-issued franchise to Google Fiber Tennessee, LLC on February 9, 2015 bringing the total number of state-issued certificates of franchise authority to seventeen. Each franchise holder has submitted its report certifying compliance with its small and minority owned business participation plan. Below are some highlights.

1. BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee certifies that it continues to comply with the Minority Owned Business Plan that it submitted with its franchise application.

2. Charter Communications submitted a copy of its Minority Vendor outreach program, which includes a qualifying form sent to 498 vendors, 92 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 $1,900 during 2014 with seven minority-owned vendors.

4. Cable One spent $8000 with four minority-owned vendors in Tennessee and also submitted a list of minority-owned and female vendors that are used company-wide by its Phoenix, AZ headquarters.

5. Highland Telephone Cooperative indicates that its plan continues in force and effect as a policy of the Cooperative.

6. Comcast indicates that it continues to comply with its plan and notes that it spent 9.7% of its total supplier expenditures with diverse vendors.

7. The Electric Power Board of Chattanooga (“EPB”) indicated that it had on-going contracts with two minority-owned Tennessee companies and will continue to find ways to increase opportunities for minority and women-owned businesses.

8. Twin Lakes Communications, Inc. attests 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 states that it continues to adhere to the Minority-Owned Business Participation Plan that it filed with its franchise application.

10. TDS Telecom Service Corporation indicated that it continues to comply with its Minority-Owned Business Participation Plan.

11. Spring City Cable TV, Inc. submitted a copy of its Minority-Owned Business Participation Plan.

12. United Communications indicated that its Minority-Owned Business Participation Plan remains unchanged from the previous year.


14. Millington CATV indicates that it will continue to comply with its Minority-Owned Business Participation Plan and look for ways to increase its contacts with Minority-Owned suppliers.

15. Community Television Company (“CTC”) states that it implemented the Minority-Owned Business Participation Plan included in its application for a state issued certificate of franchise authority. CTC states that it is in compliance with the plan.

16. Infostructure, Inc. d/b/a Click1.net indicated that it will seek to determine if existing vendors have minority status and will conduct outreach to identify minority vendors and suppliers.
Appendix 1

AT&T
January 29, 2015

Mr. Jerry Kettles
Chief, Economic Analysis & Policy
Tennessee Regulatory Authority
500 Deadrick Street, Fourth Floor
Nashville, TN 37242

RE: Minority Owned Business Plan Annual Report

Dear Mr. Kettles,

In accordance with the Competitive Cable and Video Services Act, AT&T provides this annual report concerning AT&T's Minority Owned Business Plan and compliance with that Plan. AT&T's Plan, which was provided as part of AT&T's video franchise application, is attached.

AT&T continues to comply with the attached Minority Owned Business Plan.

Sincerely,

[Signature]

Attachment
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 23, 2015

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

To whom it may concern:

Enclosed is Charter Communications Minority Vendor outreach program for 2015.

- Exhibit A represents the document we sent to existing vendors to identify Minority Vendors. To date, 498 vendors received the document, 265 have responded, and 92 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. To date, 25 of the 109 have responded.

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

Regards,

Nick Pavlis
Director of Government Relations
Tennessee/Louisiana Operations

Enclosure: Exhibit A, B
10417 Wallace Alley St. Kingsport, TN 37663

VENDOR INFORMATION

Vendor Name________________________________________________________

Remit to Address

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? _____ Yes _____ No If Yes, please provide info below:

Type of Business: _____ Corporation

Government

Limited Liability Company (LLC)

Partnership

Sole Proprietorship (Individual)

Minority Status: _____ African American Female

African American Male

Asian Indian Female

Asian Indian Male

Asian Pacific Female

Asian Pacific Male

*Please make sure this section is marked.
Exhibit A

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

______________________________  ________________________________
Signature                          Printed Name
January 12, 2015

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 attached documents and submit to:

Charter Communications
Accounts Payable
Charter Communications
10417 Wallace Alley St.
Kingsport, TN 37663

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,

Debbie Cassell
Business Manager
Tennessee/Louisiana Operations
Appendix 3
Knology
January 28, 2015

Via Electronic Mail
jerry.ketles@tn.gov

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

Re: Annual Report on Compliance with Minority Business Participation Plan

Dear Mr. Kettes:

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,

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

Enclosures
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. Ross Fischer.

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.
WOW! currently uses seven minority-owned businesses as vendors. WOW! spent approximately one thousand nine hundred ($1,900) with these vendors during 2014. WOW! will continue to stay in touch with the agencies listed in paragraph 8 of our plan as opportunities for contracts and subcontracts with our company arise.

WOW! Internet, Cable and Phone

By: [Signature]

Dated: 1/28/15
Appendix 4
Cable One
March 11, 2015

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

Re: Annual Report on Compliance With Minority Business Participation Plan

Dear Mr. Reed:

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 2014 calendar year, Cable One did business with the following minority-owned businesses in the State of Tennessee.

<table>
<thead>
<tr>
<th>Vendor</th>
<th>Expenditure ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daylight Donuts</td>
<td>$300.00</td>
</tr>
<tr>
<td>1442 Hwy 51</td>
<td></td>
</tr>
<tr>
<td>Dyersburg, TN 38024</td>
<td></td>
</tr>
<tr>
<td>Phone: 731-285-9740</td>
<td></td>
</tr>
<tr>
<td>Owner: Rita Plewa (female)</td>
<td></td>
</tr>
</tbody>
</table>

| SEZ SEW, Inc.         | $800.00         |
| P. O. Box 707         |
| 325 S. Mill Ave.      |
| Dyersburg, TN 38025   |
| Phone 737-285-2120    |
| Owners: Betty Dennis/Kim Bingham (female) |

| Private Cleaning Services | $6,600.00 |
| 3766 Sharpsey Rd        |
| Newbern, TN 38059       |
| Phone: 731-627-0078     |
| Owner: Terry Douglas (female) |

| Green & Sons Detail    | $300.00 |
| 180 US Highway 51 ByPass S |
| Dyersburg, TN 38024    |
| Phone: 731-287-8866    |
Owner: John Green (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,

[Signature]

Emerson Yearwood
Associate General Counsel--Regulatory Affairs
NATIONAL LISTING – ATTACHMENT B

Hispanic Assoc. on Corp. Responsibility
Attn: Human Resources – Jobs
1444 I Street, NW
Suite 850
Washington, DC 20005

Indian Resources Development
New Mexico State University
Box 30001, Dept. 3 IRD
Las Cruces, NM 88003-8001

Southeast Missouri State University
Dept. of Mass Communications
One University Plaza, MS2750
Cape Girardeau, MO 63701
San Carlos Apache Tribe
Carlynn Bread
PO Box 0
San Carlos, AZ 85540

Tribal Employment Rights Organization
Joy McKenzie or Andy Patricio
PO Box 837
Sells, AZ 85634
Cal Chicano News Media Assoc.
USC School of Journalism
3502 Watts Way
Los Angeles, CA 90089-0054

Western Iowa Communications College
PO Box 5199
4647 State Avenue
Sioux City, IA 51102
Minority Media & Telecommunications Counsel
3636 16th Street, NW B-366
Washington, DC 20010

American Women in Radio & TV, Inc.
1760 Old Meadow Rd., Suite 500
McLean, VA 22102
Latin Americans for Social Economic Development (LAISED)
4138 W. Vernor Highway
Detroit, MI 48209

Connecticut Puerto Rican Forum
95 Park Street, 3rd Floor
Hartford, CT 06106-2520
Mississippi Minority Skills Bank
3825 Ridgewood Drive
Jackson, MS 39211

Nat’l Academy of Television Arts and Sciences
111 W. 57th St. #1020
New York, NY 10019
Nebraska Mexican/American Commission
State Capital
PO Box 94965
Lincoln, NE 68509

KRGV-TV – Rick Diaz
900 E. Expressway
Weslaco, TX 78596
Rio Grande Assoc. of Hispanic Journalists
San Juan Center
1363 Main Street
Hartford, CT 06103

Tucson YMCA
PO Box 1111
Tucson, AZ 85702-1111
San Antonio Assoc. of Hispanic Journalists
Javier Rodriguez
PO Box 2171
San Antonio, TX 78297-2171

Nat’l Assoc. of Negro Business & Pro.
Women’s Club
1806 New Hampshire Ave. NW
Washington, DC 20009
S A M A
95 Park Street
Hartford, CT 06106

State Fair Community College
Sedalia, MO 65301
NAACP
2160 N. 6th Avenue
Tucson, AZ 85705
Nat’l Assoc. of Black Journalists (NABJ)
525 W. Broadway
Louisville, KY 40202
Appendix 5
Highland Telephone Cooperative
January 14, 2015

Mr. Jerry Kettles  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
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.

G. Mark Patterson  
General Manager

GMP/slj  
Enclosure

This institution is an equal opportunity provider and employer.
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: 1-14-15
Appendix 6
Comcast
VIA FACSIMILE & OVERNIGHT MAIL

May 20, 2015

Mr. Jerry Kettles, Chief, Economic Analysis and Policy Division
Tennessee Regulatory Authority
60 James Robertson Parkway
Nashville, TN  37243-0505


In accordance with Section 7-59-313 (d) of The Competitive Cable and Video Services Act, Comcast Cable Communications Management, LLC (“Comcast”) submits this annual report on its Minority Owned Business Participation Plan (“Plan”) performance.

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

Comcast continues to comply with the Plan. For 2014, 9.7% of the total supplier expenditures made by the Comcast operating entities holding state certificates went to diverse vendors.

Sincerely,

Otha Brandon
Director, Government Affairs
Comcast Memphis

enclosure

cc: Andy Macke

OB/mwa
MINORITY-OWNED BUSINESS PREPARATION PLAN

Comcast hereby sets forth its business plan for actively soliciting bids from minority-owned businesses and awarding contracts to such businesses when establishing, providing or expanding cable services and related support facilities in Tennessee. This business plan includes information regarding promoting, increasing, and improving the quality of the overall participation of minority, women, and service-disabled veteran-owned business enterprises in its purchases of materials and services.

1. TERMS AND TERMINOLOGY

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

A. "Comcast" refers to the Comcast entities listed in Exhibit A to the Application. Except where otherwise indicated, the information in this Plan is provided with respect to Comcast as a whole.

B. "Minority-Owned Business(es)" 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(s) 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 T.C.A. Section 4-28-201 including, but not limited to, disabled veterans; or
   3) past practices of racial discrimination against African-Americans.

C. "Minority-Owned Business Participation Plan" means a business plan for actively soliciting bids from Minority-Owned Businesses and awarding contracts to such businesses when establishing, providing or expanding cable services and related support facilities. Such Plan includes 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 Plan.

2. SUPPLIER DIVERSITY POLICY STATEMENT

Qualified, dependable, diverse partners provide Comcast with the goods and services needed to continue growing and serving our customers. Small and diverse suppliers provide us with new perspectives, insights, and understandings that enable us to innovate, compete, and tailor our business to existing and emerging markets. Comcast believes that small and diverse suppliers, who instill competitiveness into the bidding process, make all of our vendors work harder to give us their best possible product. Ultimately, our diverse supplier partnerships
empower both parties to create jobs, strengthen communities, and build value for our shareholders. As such, it is the policy of Comcast:

A. to promote, increase, and improve the quality of the overall participation of minority, women, veteran, and service-disabled veteran-owned business enterprises in its purchases of materials and services;

B. to provide maximum practical opportunity to minority, women, veteran, and disabled veteran-owned business enterprises to participate as suppliers of materials and services to Comcast; and

C. to encourage subcontracting opportunities for minority, women, veteran, and disabled veteran-owned business enterprises by requiring Supplier Diversity Participation Plans from its prime suppliers.

3. PROPOSAL FOR PURCHASING GOODS AND SERVICES FROM MINORITY-OWNED BUSINESSES

Comcast promotes the purchasing of goods and services from Minority-Owned Businesses through its comprehensive Small and Minority Owned Business Preparation Plan which incorporates the following:

A. Comcast employs a full-time Senior Manager of Supplier Diversity who reports to Comcast's Executive Director of Procurement. This individual is responsible for coordinating and managing Comcast's supplier diversity program and providing leadership, relationship management, and tactical direction to vendors looking to conduct business with Comcast.

B. Comcast employs Directors of Purchasing along with procurement support staff in each of Comcast's four operating divisions who actively participate in advancing Comcast's supplier diversity initiatives and who are responsible for encouraging the inclusion of minority-owned vendors in the competitive bid process accomplished through the use of the following tactics:

1) Training programs for procurement personnel that emphasize the importance of diversity initiatives and techniques to find qualified minority-owned suppliers to compete on bid opportunities.

2) Establishment of supplier diversity goals.

3) Development and use of a "score card" to measure actual versus goal for supplier diversity efforts.

4) Partner with minority-owned and women business organizations. (See Section 4, below)

5) Regularly update external communications regarding supplier diversity.

C. To assist potential vendors in determining their eligibility to participate in Comcast's Supplier Vendor Diversity Program, Comcast publishes the Program's criteria and qualifications on its website, www.comcast.com.

1 Comcast's "Criteria and Qualifications document can be accessed on the web using the following link: http://www.comcast.com/corporate/docust/3diversity/supplier/criteria.html"
4. BUSINESS PARTNERSHIP INITIATIVES

Comcast is partnering with the following organizations, in an effort to identify qualified Minority-Owned Businesses.

A. National Minority Supplier Diversity Council ("NMSDC"): Comcast is a national member of this organization. Additionally, we partner with eight of the local councils in order to find qualified minority-owned businesses with which to partner.

B. Women's Business Enterprise National Council ("WBENC"): Comcast actively participates with WBENC nationally. Additionally, we partner with six local councils in order to find qualified women-owned business with which to partner.

C. Women in Cable and Telecommunications ("WICT"): This is a cable-specific organization that assists Comcast in identifying and developing female leaders within the cable & telecommunications industries.

D. National Association for Minorities in Cable ("NAMIC"): This is a cable-specific organization that assists Comcast in identifying and developing minority leaders within the cable industry.

E. National Veteran Owned Business Association ("NaVOBA")

F. Walter Kaitz Foundation: advocates for diversity in the cable and telecommunications industries. Comcast is an annual sponsor of the Walter Kaitz Fundraising Dinner and the Supplier Diversity Connection seminars at the National Cable Television Association ("NCTA") and Society of Cable Television Engineers ("SCTE") conferences.

G. National Association of Women Business Owners ("NAWBO").

H. Comcast also partners with numerous Chambers of Commerce that work to support supplier diversity.

I. Member of Mid-South Minority Business Council which provides access to their database of certified minority-owned businesses.

J. Member of Memphis Chapter of Black Business Association ("BBA")

K. Member of Memphis Chapter of Hispanic Business Alliance ("HBA").

5. STATEMENT OF INTENT TO FOLLOW THE MINORITY-OWNED BUSINESS PARTICIPATION PLAN

Pursuant to this plan, Comcast shall strive to maximize participation of Minority-Owned Businesses through both prime and second tier contracting opportunities and shall strive to achieve a level of minority business participation representative of the population demographics of the state of Tennessee. On or before January 31 of each year, Comcast will prepare and submit an annual report to the Tennessee Regulatory Authority concerning Comcast's Minority-Owned Business Participation Plan and compliance with such plan.
Inquiries concerning this Plan may be directed to the Plan Administrator:

Ajamu Johnson
Comcast Cable
One Comcast Center
Philadelphia, PA 19103
(215) 286-4052
Appendix 7
Electric Power Board of Chattanooga
February 18, 2015

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

RE: Annual Report on Compliance with Minority Owned Business Participation Plan

Dear Mr. Kettles:

Pursuant to the requirements of Tenn. Code Ann. § 7-59-313, please find enclosed EPB Fiber Optics' report regarding compliance with the minority owned business plan during calendar year 2014. The plan has not changed since last year's submission.

I have enclosed EPB's 2014 report discussing EPB's plan to support minority owned businesses.

If you have any questions or concerns, please do not hesitate to call me at (423) 648-1309 or email me at dibiaseld@epb.net.

Sincerely,

David DiBiase
EPB Legal Services Division
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 2014, EPB’s Fiber Optics Division had an on-going contract with two (2) minority owned companies in Tennessee and spent in excess of $1,262,766 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 several MWOB networking events at EPB throughout 2014;
- Participating in outreach efforts with the Chattanooga Urban League, the Chattanooga Area Chamber of Commerce and the African American Business Development Board to encourage minority and women owned businesses to bid on EPB projects;
- Participation by EPB’s MWOB Manager and Purchasing Manager in development events hosted by the Tennessee Valley Authority and the Volkswagen Expo for vendors of minority and women owned 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 28, 2015

VIA ELECTRONICALLY
Jerry.Kettles@tn.gov

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

RE: Small and Minority-Owned Business Plan Annual Report

Dear Mr. Kettles:

As required by Tenn. Code Ann. § 7-59-313(d), Twin Lakes Communications, Inc. provides this annual report concerning Twin Lake Communications' Small and Minority-Owned Business Plan and Twin Lake Communications' compliance with that plan. The Plan is attached.

Twin Lakes Communications continues to comply with the attached Small and Minority-Owned Business Plan.

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

Very truly yours,

BUTLER SNOW LLP

Melvin J. Malone

Attachment
SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

Pursuant to T.C.A. §7-59-313(d), 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 §7-59-313 is to provide opportunities for small and minority-owned businesses to provide goods and services to cable or video service providers. Twin Lakes Communications is committed to the goals of §7-59-313 and to taking steps to support the participation of small and minority-owned Telecommunications businesses in the cable or video industry. Twin Lakes Communications will endeavor to provide opportunities for small and minority-owned 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 §7-59-313(a).
Minority-Owned Business. Minority-owned business shall mean 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 daily operations of such business, and who is impeded from normal entry into the economic mainstream because of past practices of discrimination based on race, religion, ethnic background, sex or disability.

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 §7-59-313(d) 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 cooperating with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and small and minority-owned businesses.

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owned businesses to locate and use qualified small and minority-owned businesses as defined in §7-59-313(a).

(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 cooperating 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.

(8) Providing information and educational activities to persons within Twin Lakes Communications 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

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: [Signature]
Administrator

Dated: January 27, 2015.
January 22, 2015

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

Via US Mail

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. §7-59-313.

NCC was granted its certificate of public convenience and necessity on November 23, 2010. A copy of the company’s minority and business participation plan was filed as part of that application and is included here.

NCC continues to adhere to the plan and remains confident that our plan meets the expectations of T.C.A. §7-59-313.

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

Sincerely,

Nancy J. White, President/CEO

Enclosures
Pursuant to T.C.A. §7-59-313, as amended, North Central Telephone Cooperative ("NCTC") submits this minority-owned business participation plan (the "Plan") along with its Application of North Central Telephone Cooperative for a State-Issued Certificate of Franchise Authority in Tennessee.

I. Purpose

The purpose of §7-59-313 is to provide opportunities for minority-owned businesses to provide goods and services to video and cable service providers. NCTC is committed to the goals of §7-59-313 and to taking steps to support the participation of minority-owned businesses in the video and cable industry. NCTC 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, NCTC will make efforts to identify and inform minority-owned businesses that are qualified and capable of providing goods and services to NCTC of such opportunities to do so. NCTC 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 §7-59-313.

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.

III. Administration

NCTC’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 NCTC’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 Telephone Cooperative
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 §7-59-313 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 §7-59-313.

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 NCTC 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

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

NCTC will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan when requested. Moreover, NCTC will cooperate fully with surveys and studies required by the Tennessee Regulatory Authority.
Appendix 10
TDS Telecom Service Corporation
February 26, 2015

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

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

Dear Mr. Kettles,

In accordance with the Competitive Cable and Video Services Act, Section 7-59-313 of the Tennessee Code, please find the Minority Owned Telecommunications Business Participation Plans for the TDS Telecom companies: Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tellico Telephone Company and Tennessee Telephone Company.

The above TDS Telecom companies continue to comply with the attached Minority Owned Business Plans.

Please let me know if you have any questions.

Sincerely,

[Signature]

Bruce Mottern
Manager - State Government Affairs
TDS Telecom
TDS Telecom Service Corporation – Tennessee
January 2015

MINORITY-OWNED
BUSINESS PARTICIPATION PLAN
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 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 United 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.
TDS Telecom
Tellico Telephone Company

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS
BUSINESS PARTICIPATION PLAN

SUBMITTED TO THE
TENNESSEE REGULATORY AUTHORITY

January 30, 2015
SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

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SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

1.0 PLAN

1.1 This small and minority-owned telecommunications business participation plan (Plan) is submitted by TDS Telecom as required by Section 16 of the Tennessee Telecommunications Act of 1995, now codified as T.C.A. § 65-5-212.

1.2 The Administration of this Plan is the responsibility of TDS Telecom. It is the policy of TDS Telecom to provide an opportunity for Small Business, and Minority-Owned Businesses to compete for subcontracts awarded by TDS Telecom on a fair and equitable basis with certified telecommunications suppliers and contractors.

1.3 This plan is a statement of objectives and is not intended to create any legal obligation of TDS Telecom to any person or organization.

2.0 DEFINITIONS

2.1 Small Business - For the purpose of this Plan, "small business" means a business with annual gross receipts of less than four million dollars ($4,000,000) per T.C.A. §65-5-212.

2.2 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 because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars ($4,000,000) per T.C.A. §65-5-212.
3.0 PLAN RESPONSIBILITY AND POLICY STATEMENT

3.1 It is the policy of TDS Telecom to afford Small and Minority-Owned Telecommunications Businesses an opportunity to participate in the performance of contracts in accordance with T.C.A. 665- 5-212.

3.2 As a purchaser of goods and services, it is TDS Telecom – responsibility to:

- Identify and maintain a pool of qualified Telecommunications suppliers.
- Provide opportunities for Small and Minority Owned Businesses to bid in those solicitations for telecommunications 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 Telecom is committed to providing affirmative access to contracting opportunities for Small and Minority-Owned Telecommunications Businesses. TDS Telecom is proactive and will move toward inclusion of such firms in the telecommunications 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 Telecom 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 relate to this Plan are as follows:

(a) Develops and maintains a Supplier Master List which is a listing of Small and Minority-Owned Telecommunications Businesses who are deemed eligible to be telecommunications suppliers for TDS Telecom.

(b) Establishes and maintains policies and procedures to ensure that Small and Minority-Owned Telecommunications Businesses have an equitable opportunity to be awarded contracts.

(c) Ensures inclusion of Small and Minority-Owned Telecommunications Businesses in those solicitations for telecommunications products or services which they are capable of providing, and which meet United States Department of Agriculture Rural Utility Service (RUS) standards.

(d) Maintains Small and Minority-Owned Telecommunications 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 Small Business workshops, 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 Telecom 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 Small and Minority-Owned Telecommunications Businesses for participation in contracting opportunities.

(b) The Administrator shall ensure that TDS Telecom assists Small and Minority-Owned Telecommunications 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 Telecom provides adequate and timely consideration of the potentialities of Small and Minority-Owned Telecommunications 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 Telecom 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 Telecom will maintain, if required, the following types of records:

(a) Source lists, guides, and other data that identify Small and Minority-Owned Telecommunications Businesses.

(b) Lists of organizations contacted in an attempt to locate sources that are Small and Minority-Owned Telecommunications Businesses.

(c) Records of any outreach efforts to contact trade associations, business Development organizations, and conferences and trade fairs attended.

7.3 TDS Telecom’s Supplier Master List identifies Small and Minority-Owned Telecommunications 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.
TDS Telecom
Tennessee Telephone Company

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS
BUSINESS PARTICIPATION PLAN

SUBMITTED TO THE
TENNESSEE REGULATORY AUTHORITY

January 30, 2015
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1.0 PLAN

1.1 This small and minority-owned telecommunications business participation plan (Plan) is submitted by TDS Telecom as required by Section 16 of the Tennessee Telecommunications Act of 1995, now codified as T.C.A. § 65-5-212.

1.2 The Administration of this Plan is the responsibility of TDS Telecom. It is the policy of TDS Telecom to provide an opportunity for Small Business, and Minority-Owned Businesses to compete for subcontracts awarded by TDS Telecom on a fair and equitable basis with certified telecommunications suppliers and contractors.

1.3 This plan is a statement of objectives and is not intended to create any legal obligation of TDS Telecom to any person or organization.

2.0 DEFINITIONS

2.1 Small Business - For the purpose of this Plan, "small business" means a business with annual gross receipts of less than four million dollars ($4,000,000) per T.C.A. §65-5-212.

2.2 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 because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars ($4,000,000) per T.C.A.§65-5-212.
3.0 PLAN RESPONSIBILITY AND POLICY STATEMENT

3.1 It is the policy of TDS Telecom to afford Small and Minority-Owned Telecommunications Businesses an opportunity to participate in the performance of contracts in accordance with T.C.A. 665-5-212.

3.2 As a purchaser of goods and services, it is TDS Telecom –responsibility to:

- Identify and maintain a pool of qualified Telecommunications suppliers.
- Provide opportunities for Small and Minority Owned Businesses to bid in those solicitations for telecommunications 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 Telecom is committed to providing affirmative access to contracting opportunities for Small and Minority-Owned Telecommunications Businesses. TDS Telecom is proactive and will move toward inclusion of such firms in the telecommunications 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 Telecom 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 relate to this Plan are as follows:

(a) Develops and maintains a Supplier Master List which is a listing of Small and Minority-Owned Telecommunications Businesses who are deemed eligible to be telecommunications suppliers for TDS Telecom.

(b) Establishes and maintains policies and procedures to ensure that Small and Minority-Owned Telecommunications Businesses have an equitable opportunity to be awarded contracts.

(c) Ensures inclusion of Small and Minority-Owned Telecommunications Businesses in those solicitations for telecommunications products or services which they are capable of providing, and which meet United States Department of Agriculture Rural Utility Service (RUS) standards.

(d) Maintains Small and Minority-Owned Telecommunications 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 Small Business workshops, 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 Telecom 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 Small and Minority-Owned Telecommunications Businesses for participation in contracting opportunities.

(b) The Administrator shall ensure that TDS Telecom assists Small and Minority-Owned Telecommunications 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 Telecom provides adequate and timely consideration of the potentialities of Small and Minority-Owned Telecommunications 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 Telecom 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 Telecom will maintain, if required, the following types of records:

(a) Source lists, guides, and other data that identify Small and Minority-Owned Telecommunications Businesses.

(b) Lists of organizations contacted in an attempt to locate sources that are Small and Minority-Owned Telecommunications Businesses.

(c) Records of any outreach efforts to contact trade associations, business Development organizations, and conferences and trade fairs attended.

7.3 TDS Telecom’s Supplier Master List identifies Small and Minority-Owned Telecommunications 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.
Appendix 11
Spring City Cable TV, Inc.
January 23, 2015

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 26, 2015

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

Via email (jerry.kettes@tn.gov)

Re: Minority Owned Business Participation Plan Annual Report

Dear Mr. Kettes:

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 2014 and the plan remains in place.

United was granted a statewide franchise in 2012 and originally filed a copy of this plan with its application.

Please let me know if you have any questions or need any additional information. I can be reached at 931.364.4322.

Best regards,

[Signature]

William Bradford  
President & CEO
UNITED TELEPHONE COMPANY
and
UNITED COMMUNICATIONS, INC. (FORMERLY UTC VIDEO CONCEPTS, LLC)
Chapel Hill, Tennessee

TENNESSEE

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS
PARTICIPATION PLAN

SUBMITTED TO THE
TENNESSEE REGULATORY AUTHORITY
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SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS
PARTICIPATION PLAN

1.0 PLAN

1.1 This Small and Minority-Owned Telecommunications Business Participation Plan (Plan) is submitted by United Telephone Company as required by Section 16 of the Tennessee Telecommunications Act of 1995, now codified as T.C.A. § 65-5-112.

1.2 The Administration of this Plan is the responsibility of United Telephone Company. It is the policy of United Telephone Company to provide an opportunity for Small Business, and Minority Businesses to compete for subcontracts awarded by United Telephone on a fair and equitable basis with Telecommunications suppliers and contractors.

2.0 DEFINITIONS

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

2.2 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 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) per T.C.A. § 65-5-112.

2.3 United Telephone Company – For the purpose of this Plan, “United Telephone Company” includes both United Telephone Company and its wholly-owned subsidiary, United Communications, Inc. (formerly UTC Video Concepts, LLC).

3.0 PLAN RESPONSIBILITY AND POLICY STATEMENT

3.1 It is the policy of United Telephone Company to afford Small and Minority-Owned Telecommunications Businesses and opportunity to participate in the performance of contracts in accordance with T.C.A. § 65-5-112.

3.2 As a purchaser of goods and services, it is United Telephone’s responsibility to:

- Identify and maintain a pool of qualified Telecommunications suppliers.
- Provide opportunities for Small and Minority-Owned Telecommunications Businesses to bid in those solicitations for products or services which they are capable of providing and which meet RUS (Rural Utilities Service) standards.

4.0 PLAN PERIOD OF EFFECTIVENESS

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

5.1 United Telephone Company’s Plan Administrator is:

Mr. William Bradford
President & CEO
120 Taylor Street
P. O. Box 38
Chapel Hill, Tennessee 37034
Telephone: 931/364-4355   Fax: 931/364-7202

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 a Supplier Master List, which is a listing of Small and Minority-Owned Telecommunications Businesses who are deemed eligible to be suppliers for United Telephone Company.

(b) Establishes and maintains policies and procedures to ensure that Small and Minority-Owned Telecommunications Businesses have an equitable opportunity to be awarded contracts.

(c) Ensures inclusion of Small and Minority-Owned Telecommunications Businesses in those solicitations for products or services which they are capable of providing, and which meet RUS standards.

(d) Ensures that United Telephone Company documents its reasons for not awarding contracts in response to the bids submitted by Small and Minority-Owned Telecommunications Businesses.

(e) Maintains Small and Minority-Owned Telecommunications Businesses related correspondence and record keeping.

(f) Coordinates activities during the conduct of any compliance review by the Tennessee state agencies.

(g) Attends or arranges for attendance by appropriate members of management of Small Business workshops, Minority Business Enterprise Seminars, Trade Fairs, and Conventions.

(h) Reviews performance on Small and Minority-Owned Telecommunications Businesses contracting.

(i) Prepares and submits periodic contracting reports as necessary.

6.0 PLAN TO ENSURE 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 United Telephone Company approved Master Supplier List.

(b) Information received from the Small Business Administration Procurement Automated Source System (PASS).
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 Small and Minority-Owned Telecommunications Businesses for participation in contracting opportunities.

(b) The Administrator shall ensure that United Telephone Company assists Small and Minority-Owned Telecommunications 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 United Telephone Company provides adequate and timely consideration of the potentialities of Small and Minority-Owned Telecommunications 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 United Telephone Company 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 United Telephone Company will maintain, if required, the following types of records:

(a) Source lists, guides, and other data that identify Small and Minority-Owned Telecommunications Businesses.

(b) Lists of organizations contacted in an attempt to locate sources that are Small and Minority-Owned Telecommunications Businesses.

(c) Records of any outreach efforts to contact trade associations, business development organizations, and conferences and trade fairs attended.

7.3 United Telephone Company’s Supplier Master List identifies Small and Minority-Owned Telecommunications 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.
Appendix 13
West Kentucky Rural Telephone Cooperative
May 12, 2015

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, enclosed 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,

Todd Crandall
Chief Financial Officer

Enclosure
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:

Trevor Bonnstetter, CEO
West Kentucky Rural Telephone Cooperative Corporation, Inc. (dba WK&T)
237 North 8th Street
Mayfield, Kentucky 42066
Telephone: 270-674-1000
Faximile: 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: ________________

Trevor Bonnstetter
CEO

January 2015
Appendix 14
Millington CATV
January 28, 2015

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, has be involved in outreach activities to identify qualified suppliers including becoming active in the local Chambers of Commerce and being active in local and regional trade events.

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

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

Sincerely,

Ritter Communications Holdings

[Signature]

John Strode
Vice President
Millington CATV, Inc.

MINORITY-OWNED
BUSINESS PARTICIPATION PLAN
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 Shipman
PO Bx 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 Shipman

State of Arkansas  
County of Craighead  
Sworn to and subscribed before me, this 28 day of January, 2015.

Margaret Holloway
Notary Public

My Commission Expires: 2/25/20
Appendix 15
Community Television Company
January 12, 2015

Via Federal Express
Tracking No.: 7725 5836 7234

Tennessee Regulatory Authority
Economic Analysis and Policy Division
Attn: Jerry Kettles
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Community Television Company (CTC); 2014 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 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.

Sincerely,

Darrell Harper
Vice President of Finance & Admin.

Enclosures
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.
July 23, 2015

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 2015.

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
Technical Operations Manager
314 N 22nd Ave
Humboldt, TN 38343

Attachments: Minority Status Request Form
Outreach List
Minority Vendor Program Letter
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
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
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
Technical Operations 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)
Vendor Information

Physical Address:
Name
Address
City
State
Zip
Phone #
Email Address

<table>
<thead>
<tr>
<th>Briefly Describe Services Offered by Vendor</th>
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Type of Business (check one):
Individual
Partnership
Corporation

Minority Status:            Male    Female
African American
Asian Indian
Asian Pacific
Hispanic
Native American
Caucasian  N/A

Signature:

Printed Name

Title:

Date