



# Competitive Cable & Video Services Act Minority Owned Business Participation Plan Report For 2020



TENNESSEE PUBLIC UTILITY COMMISSION  
DECEMBER 2021

# TENNESSEE PUBLIC UTILITY COMMISSION

Earl R. Taylor, Executive Director  
(615) 741-0917



Andrew Jackson State Office Bldg.  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243-0001

December 9, 2021

The Honorable Bill Lee  
Governor

Dear Governor Lee:

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 2020. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Earl Taylor".

Earl R. Taylor  
Executive Director

C: Chief Clerk of the House Tammy Letzler  
Chief Clerk of the Senate Russell Humphrey

# TENNESSEE PUBLIC UTILITY COMMISSION

Earl R. Taylor, Executive Director  
(615) 741-0917



Andrew Jackson State Office Bldg.  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243-0001

December 9, 2021

Russell Humphrey  
Chief Clerk of the Senate

Dear Chief Clerk Humphrey:

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# TENNESSEE PUBLIC UTILITY COMMISSION

Earl R. Taylor, Executive Director  
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Nashville, TN 37243-0001

December 9, 2021

Tammy Letzler  
Chief Clerk of the House

Dear Chief Clerk Letzler:

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A handwritten signature in cursive script that reads "Earl Taylor".

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Executive Director

C: Governor Bill Lee  
Chief Clerk of the Senate Russell Humphrey

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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).<sup>1</sup> 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.”<sup>2</sup>

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<sup>1</sup> 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.”

<sup>2</sup> Tenn. Code Ann. § 7-59-313(b).

# Annual Review

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

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

Below are some highlights of the Minority-Owned Business Participation Plan reports filed by franchise holders.

1. BellSouth Telecommunications, Inc. d/b/a AT&T Tennessee provided a copy of its Small and Minority Owned Business Plan.
2. Charter Communications submitted a copy of its Small and Minority Owned Business Plan
3. Knology d/b/a WOW! Internet, Cable and Phone, spent approximately \$16,000 during 2020 with 12 small or minority-owned Tennessee vendors.
4. Cable One spent over \$9,000 with 5 minority-owned vendors in Tennessee.
5. Highland Telephone Cooperative provided a copy of its Minority Owned Business Participation Plan. Highland Telephone Cooperative indicated that its plan continues in force and effect as a policy of the Cooperative.
6. Comcast notes that it spent 23% of its total supplier expenditures in Tennessee with diverse vendors in 2020 and continues to comply with its plan.
7. The Electric Power Board of Chattanooga ("EPB") indicated that in 2020 its Fiber Optics Division conducted business with 19 minority-owned Tennessee companies and spent in excess of \$6.1 million with these companies.
8. Twin Lakes Communications, Inc. stated that it continues to comply with its Minority-Owned Telecommunications Business Participation Plan.
9. North Central Telephone Cooperative stated that it continues to adhere to the Minority-Owned Business Participation Plan.
10. TDS Telecom Service Corporation submitted a copy of its Minority-Owned Business Participation Plan.

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<sup>3</sup> Tenn. Code Ann. § 7-59-313(d).

11. Spring City Cable TV, Inc. submitted a copy of its Minority-Owned Business Participation Plan.
12. United Communications stated that there were no changes to its plan in 2020 and that the plan remains in place.
13. West Kentucky Rural Telephone Cooperative Corporation submitted a copy of its Minority-Owned Business Participation Plan.
14. Millington CATV ("MCATV") stated that it paid Minority-Owned businesses over \$24,000 in 2020.
15. Community Television Company ("CTC") stated that it implemented and is in compliance with its Minority-Owned Business Participation Plan.
16. InfoStructure Inc. supplied a copy of letter that it is sending to certified Minority vendors that was supplied by the Tennessee Department of Economic & Community
17. Crystal Clear Technologies stated that its Minority-Owned Business Participation Plan is in effect as the policy of the company.
18. SVE Connect provided a copy of its Minority-Owned Business Participation Plan.
19. Holston Connect provided a copy of its Minority-Owned Business Participation Plan.
20. Gibson Connect indicated that it is committed to fulfilling the requirements of its Minority-Owned Business Plan.
21. Meriwether Lewis Connect provided a copy of its Minority-Owned Business Participation Plan.
22. Johnson City Energy Authority d/b/a/ BrightRidge submitted a copy of its Minority-Owned Business Participation Plan.
23. Point Broadband Holding submitted a copy of its Minority-Owned Business Participation Plan.
24. DTC Communications noted that its original Minority-Owned Business Participation Plan remains unchanged and that it continues to comply with the plan.
25. Full Tilt submitted a copy of its Minority-Owned Business Participation Plan.

# Appendix 1

## AT&T



**AT&T**

**Dennis Wagner**  
Director - External & Legislative Affairs

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

T: 615.214.4066  
F: 615.214.8867  
[dennis.wagner@att.com](mailto:dennis.wagner@att.com)  
[www.att.com](http://www.att.com)

January 28, 2021

Mr. Jerry Kettles  
Tennessee Public Utility Commission  
502 Deaderick Street – 4<sup>th</sup> Floor  
Nashville, TN 37243

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

Dear Mr. Kettles:

As required by Tennessee Code Annotated §7-59-313(d), attached is the Small and Minority-Owned Business Telecommunications Plan for the following AT&T entities:

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

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

Regards

Dennis Wagner

## **AT&T Tennessee TRA Small and 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 products 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 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 products and services to AT&T.

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

### **III. AT&T Supplier Diversity Program**

AT&T promotes the purchase of products and services from minority owned businesses through its extensive AT&T Supplier Diversity Program. Supplier Diversity Managers assist current and potential diverse suppliers with 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 minority, women and disabled veteran business enterprises within its supply chain. AT&T looks for opportunities to work with diverse suppliers in all aspects of its business – from marketing to cloud computing, wireless, 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 supplier diversity program has three main components – 1) Supplier development of minority suppliers; 2) Tier two subcontracting with AT&T's prime suppliers; and outreach participation with advocacy organizations.

As part of the program, AT&T provides potential suppliers with information and contacts to assist those firms seeking to do business. AT&T Supplier Diversity Managers and Supply Chain Managers work closely with minority suppliers to identify business opportunities. AT&T provides coaching and mentoring to its strategic diversity firms to ensure they continue to meet AT&T's supplier requirements.

Another essential effort within the AT&T Supplier Diversity Program is its Prime Supplier Program. The program helps AT&T's prime suppliers increase the utilization of minority, women and disabled-veteran owned businesses in its supply chain through subcontracting. The program helps prime supplier (a) establish or enhance their own supplier diversity program; (b) develop an annual plan outlining how the supplier will provide better business solutions subcontracting with diverse companies; and (c) report quarterly results to AT&T showing progress towards their supplier diversity goals.

The Supplier Diversity team participates in outreach events and hosts customized activities for diverse businesses to connect with Sourcing Managers, Supplier Diversity professionals and key AT&T senior level managers. These include Matchmakers, business opportunity expos, information sessions and workshops.

AT&T is an active corporate member with important organizations such as the National Minority Supplier Development Council (NMSDC), Women's Business Enterprise National Council, National Veterans Business Development Council. AT&T has been a long-standing supporter of the Tri-State Minority Supplier Development Council (TSMSSDC), a NMSDC affiliate, headquartered in Nashville, TN. We participate in TSMSSDC programs to support the economic

growth and development of minority businesses. Additionally, AT&T holds memberships with numerous minority Chambers of Commerce that work to promote supplier diversity. AT&T 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. Business Development Program**

The AT&T Supplier Diversity has a business development program that encompass technical and development forums and workshops targeted to micro, small, medium and large certified diverse businesses.

The technical and business development programs assist minority-owned businesses with refining business plans, developing business strategies, establishing achievable targets and helping them compete more successfully in a global supply chain. Highlighted below is a summary of the program created and/or supported by the AT&T Supplier Diversity team.

**Executive Scholarships:** Through AT&T Supplier Diversity Education Program, scholarships are awarded to minority business executives to attend advanced management education programs. These graduate-level executive management programs assist diverse businesses in their pursuit of operational excellence to grow their businesses to the next level.

**Mentoring Programs:** This program helps companies improve their operations and increase their ability to win corporate contracts. In-depth discussions, mentoring, business reviews and one-on-one meetings are provided so that businesses can excel to the next level.

#### **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 tier two 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.

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 28, 2021

Tennessee Public Utility Commission  
Carlos C. Black, M.B.E.  
Utility Rate Analyst  
502 Deaderick Street, 4th Floor  
Andrew Jackson State Office Building  
Nashville, TN 37243

**Re: Minority-Owned Business Participation Plan**

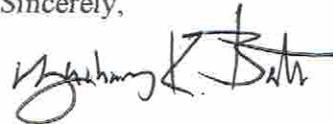
Dear Mr. Black:

In accordance with the reporting requirement of the Competitive Cable and Video Services Act in section § 7-59-313(d) of the Tennessee Code, please see the annual report concerning its Minority-Owned Business Participation Plan for Charter Communications.

As one of Tennessee's leading connectivity companies serving families and businesses through our Spectrum brand, Charter Communications is committed to diversity and inclusion in every aspect of our business. We are proud of our workforce, which is comprised of 47% people of color, 33% women and 10% veterans, and actively promote diversity at every level of the company. We also rely on a robust pipeline of suppliers, and surpassed \$1 billion in diverse supplier spend in 2018 and 2019. As we strive to deliver high-quality products and services that exceed our customers' expectations, we embrace the unique perspectives and experiences of our employees and partners, and the communities we serve. This focus makes us a stronger, more competitive company.

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

Sincerely,



Zachary Bates  
Director, Government Affairs

# CHARTER COMMUNICATIONS OPERATING, LLC

## MINORITY OWNED BUSINESS PARTICIPATION PLAN

Pursuant to the COMPETITIVE CABLE AND VIDEO SERVICES ACT, PUBLIC CHAPTER 932 (THE "ACT") § 14, Charter Communications Operating, LLC ("Charter") submits this minority-owned business participation plan (the "Plan") along with its Affidavit for a Certificate to provide video services in Tennessee.

### 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. Charter 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. Charter 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, Charter will make efforts to identify and inform minority-owned businesses that are qualified and capable of providing goods and services to Charter of such opportunities. Moreover, Charter 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

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

David Demming  
Director of Purchasing  
6399 South Fiddler's Green Circle  
Greenwood, CO 80111

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 businesses and encourage such businesses to participate in and bid on contracts and subcontracts.
- 6) Providing records and reports in any authorized surveys as required 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 Charter 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.

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

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

Charter Communications Operating, LLC

By: \_\_\_\_\_  
David N. Demming  
Director Purchasing

Dated: \_\_\_\_\_

# Appendix 3

## Knology



January 15, 2021

*Via Electronic Mail*  
*jerry.kettles@tn.gov*

Mr. Jerry Kettles  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

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

Dear Mr. Kettles:

Pursuant to §7-59-313 of the Tennessee Code, please find Knology's (dba WOW! Internet, Cable and Phone) Minority Owned Business compliance status report. As always, thank you in advance for your courtesies in this matter. Should you have any questions about the enclosed material, please don't hesitate to call me at (706) 634-1600. Please note change in contact information.

Respectfully submitted,

A handwritten signature in blue ink that reads "Susan Otto".

Susan Otto  
Regulatory Compliance Analyst  
WOW! Internet, Cable and Phone  
(706)634-1600 Fax: (706)645-8169  
Susan.otto@wowinc.com

Enclosures

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

**MINORITY OWNED BUSINESS PARTICIPATION PLAN**

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

**I. PURPOSE**

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

**II. DEFINITIONS**

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

**III. ADMINISTRATION**

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

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.

**2020 MINORITY OWNED BUSINESS PARTICIPATION PLAN**  
**ACTIVITY UPDATE**

WOW! currently uses twelve small or minority-owned businesses as vendors. WOW! spent approximately sixteen thousand dollars (\$16,000) with these vendors during 2020. WOW! will continue to stay in touch with the agencies listed in our plan as opportunities for contracts and subcontracts with our company arise.

WOW! Internet, Cable and Phone

By: Susan Otto

Dated: 1-15-2021

# Appendix 4

## Cable One

January 29, 2021

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

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

Re: Annual Report on Compliance With Minority Business Participation Plan

Dear Mr. Kettles:

Pursuant to its state-issued Certificate of Franchise Authority, Cable One, Inc hereby submits the following report on compliance with its Minority-Owned Business Participation Plan. During the 2020 calendar year, Cable One did business with the following minority-owned businesses in the State of Tennessee.

<u>Vendor</u>	<u>Expenditure (\$)</u>
<b><u>Sez Sew</u></b> Owners: Betty Dennis/Kim Bingham (female) PO Box 707 325 S. Mill Ave. Dyersburg, TN 38025 737-285-2120	\$2,100
<b><u>Terry Douglas-Cleaning</u></b> Owner: Terry Douglas (female) 3766 Sharpsferry Rd. Newbern, TN 38059 731-627-0078	\$6,600
<b><u>Curry Detail Shop</u></b> Owner: Christopher Curry 146 Chandler Dr., Dyersburg, TN 38024	\$300

**EI Patio**

Owner: Jorge Leon (male  
minority)  
1130 Us Highway 51 Byp N  
Dyersburg, TN 38024  
(731) 287-9488

\$50

**Express Donuts and Yogurt**

Owner: Vichit So (male minority)  
1130 US Highway 51 ByPass W  
Ste 32  
Dyersburg, TN 38024  
731-286-4800

\$70

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,



Emerson Yearwood  
Associate General Counsel--Regulatory Affairs

Copy:

P. Witty  
R. Morgan  
A. Abraham

W-9 / W-8	Effective Date of Contract	Expiration Date of Contract	SOW - System/Type/Year	General Liability Expiration	Auto Expiration	W/C Expiration or Waiver
2019	8/23/2019	8/23/2021		8/30/2021	6/1/2021	9/1/2021
2019						
2019	11/15/2019	11/15/2021	SOW on file	10/1/2020	10/1/2020	10/1/2020
2018						
2020				8/28/2021		
2017	5/1/2019	5/1/2021		2/10/2021	2/10/2021	WAIVER
2019	11/22/2019	11/22/2021		12/31/2020	12/31/2020	12/31/2020
2017	11/25/2019	11/25/2021	SOW 2019	11/12/2020	11/12/2020	12/31/2020
2019	9/25/2019	9/25/2021	SOW 2019	10/5/2020	9/25/2020	
2018	4/1/2020	4/1/2022		6/1/2021	6/1/2021	6/1/2021
2020	2/7/2020	2/7/2022		1/3/2021	2/2/2021	3/5/2021
2019	5/8/2019	5/8/2021	SOW 2019	9/15/2020	9/15/2020	9/15/2020
2019						
2020	4/28/2020	4/28/2022	SOW 2020	4/2/2021	4/2/2021	4/2/2021
2016						
2011	2/21/2020	2/21/2022		1/14/2021	1/14/2021	12/7/2020
2018	11/19/2018	11/19/2020	SOW 2019	3/19/2021	3/19/2021	3/19/2021
2019	9/16/2019	9/16/2021	SOW 2020	6/1/2021	6/1/2021	6/1/2021

Other & Expiration	AI	Products/Services Description	Vendor Type	Vendor Code
UMB \$5MIL 08/30/21	YES	HVAC	Contractor	58597
		Mats	Supplier	58139
UMB \$10MIL 10/01/20	YES	Engineering	Contractor/Supplier	58827
		Headsets-Wired or Wireless- Phone Misc - CCC	Supplier	46494
		Cleaning	Contractor	
	YES	Reconstructive	Contractor	54958
UMB Liab \$6MIL	YES	Land Surveying	Contractor	58826
Umb \$6MIL 12/31/20	YES	IT Sales, Services, Telephony,Cabling	IT Contractor	56228
Errors & Omissions 10/05/19	YES	Construction	Contractor	58694
		Office Furniture	Supplier	54659
Umb Liab \$5Mil 6/1/21	YES	Construction, Boring	Contractor	56247
	YES	Construction	Contractor	54974
UMB \$5M	YES	Construction	Contractor	17908
		Software	Supplier	58543
UMB \$5M 04/02/2021	YES	Construction	Contractor	59146
		Software IT Equipment	Supplier	56252
	YES	A/C & Heating	Contractor	51346
Umb 2M 03/19/2021	YES	Drops & Installs	Contractor	57814
	Yes	Construction	Contractor	43995

<b>Company Name or Owner Name</b>	<b>Street Address</b>	<b>2nd Street or PO</b>	<b>City</b>
Alcatex, Inc	669 FM 1138		Royse City
Arkansas Mill Supply Co	701 Commerce Rd		Pine Bluff
BlueStream Professional Services (KGPCo)	3305 Highway 60 West		Faribault
Call One, Inc	400 Imperial Blvd	PO Box 9002	Cape Canaveral
CEI Services	418 E. 12th Street		Anniston
Charles R. Gayden		PO Box 682	Summit
CivilCorp, LLC	4611 E Airline Rd Ste 300		Victoria
Digicom Systems (NED)	4409 Lake Apache Dr		Corpus Christi
Erik Oakley (Oakley Construction)	100 Dove		Sanford
Freedom Office Furniture	1841 W Oak Parkway	Ste D	Marrietta
GridSource Inc (formerly CableWorks)	8061 Pecue Lane		Baton Rouge
Jesus Garcia Rodriguez dba JG Construction	2832 Gumwood Park		Richland
Mastec North America	700 Commerce Dr, Ste 235		Woodbury
Minitab Inc	1829 Pine hall Rd		State College
Mintco Services LLC	8300 Bissonnet St	Ste 570	Houston
Rincon Technology	Dept 3081 PO Box 123081		Dallas
Silva's Refrigeration	7760 E State Route 69, STE C5-387	PO Box 26568	Prescott Valley
Sunrise Utilities Network Corp		PO Box 20908	Albuquerque
The Fishel Company dba Team Fishel	1366 Dublin Road		Columbus

State	Zip	Minority Owned Business	Green Initiatives	Certifications	Supplier Info Form
TX	75189	Yes	Yes		2019
AR	71601	Yes	Yes		2019
MN	55021	Yes	Yes		2019
FL	32920	Yes	No		
AL	36207	Yes	No	Yes	2020
MS	39666	Yes	No		
TX	77904	Yes	No		
TX	78427	Yes	No		
TX	79078	Yes	No		2019
GA	30062	Yes	Yes		
LA	70884	Yes	No		2020
TX	76118	Yes	Yes		
MN	55125	Yes	Yes		2019
PA	16801	Yes	Yes		2019
TX	77074	Yes	No		2020
TX	75312-3081	Yes	Yes		2017
AZ	86312	Yes	Yes		
NM	87154	Yes	Yes		
OH	43215	Yes	Yes		2020

Phone Number	E-Mail Address	Contact Name	Notes
972-226-0047	<a href="mailto:allisonb@alcatex.com">allisonb@alcatex.com</a>		
870-534-6540	<a href="mailto:payables@arkansasmill.com">payables@arkansasmill.com</a>		
507-384-0301	<a href="mailto:Adrienne.Orourke@kgpco.com">Adrienne.Orourke@kgpco.com</a>		
256-770-7317	<a href="mailto:info@ceiservices.co">info@ceiservices.co</a>	Brittany Williams	
601-551-0699	Charles Gayden		
361-570-7500	<a href="mailto:cdooley@civilcorp.us">cdooley@civilcorp.us</a>		
	<a href="mailto:despinosa@digicomsystems.net">despinosa@digicomsystems.net</a>		
806-898-1564	<a href="mailto:erik.oakley@gmail.com">erik.oakley@gmail.com</a>		
770-514-0822	<a href="mailto:w@gcsgroupus.com">w@gcsgroupus.com</a>	W. Tucker	
225-752-2253	<a href="mailto:angeliacole@gogridsource.com">angeliacole@gogridsource.com</a>	Angelia Cole	Inside Sales Les Garrison lesgarrison@gogridsource.com
214-710-5705	<a href="mailto:jg116007@gmail.com">jg116007@gmail.com</a>		
214-571-2518	<a href="mailto:jason.kistenmacher@mastec.com">jason.kistenmacher@mastec.com</a>	Jason Kistenmacher	
814-238-3280	<a href="mailto:AR@minitab.com">AR@minitab.com</a>		
713-484-7786 x1242	<a href="mailto:ap@mintcogroup.com">ap@mintcogroup.com</a>	Arnaz Virani	
763-634-8252	<a href="mailto:jmiller@rincontechology.com">jmiller@rincontechology.com</a>	Janet Miller	
903-815-6971	<a href="mailto:sl.lindsey@verizon.net">sl.lindsey@verizon.net</a>	Stephen Lindsey	
505-362-8390	<a href="mailto:Laura.hidalgo@sunriseonsite.com">Laura.hidalgo@sunriseonsite.com</a>		
800-347-4351 928-775-9201	<a href="mailto:jmstanton@teamfishel.com">jmstanton@teamfishel.com</a>	John Stanton	Rob Jenkins sales rajenkins@teamfishel.com

Appendix 5  
Highland Telephone Cooperative



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

EMAIL  
highland@highlandtel.net

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

Fax 423/628 2409

January 19, 2021

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

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

Dear Mr. Kettles:

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

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

Sincerely,

HIGHLAND TELEPHONE COOPERATIVE, INC.

G. Mark Patterson  
General Manager

GMP/slj  
Enclosure

Highland Telephone Cooperative

## **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: 1-19-21

# Appendix 6

## Comcast



*Via Electronic Mail*

May 6, 2021

Mr. Jerry Kettles  
Director, Economic Analysis  
Tennessee Public Utility Commission  
60 James Robertson Parkway  
Nashville, Tennessee 37243

**Re: Minority-Owned Business Plan Annual Report – 2020**

Dear Mr. Kettles:

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

Comcast continues to comply with the terms of the Plan. To that end, I am pleased to report the company spent \$46.5 million with diverse suppliers in Tennessee. That equates to 23.0% of our total supplier expenditures in the state. This represents a 60.8% increase over our 2019 minority supplier expenditures of \$29.0 million.

For your convenience, please find the enclosed copy of the Plan filed as Exhibit E to Comcast’s application for a state-issued certificate of franchise authority.

Should you have any questions regarding this matter or if I can be of any further assistance, you may reach me by phone at (904) 716-0107 or by email at [justin\\_damiano@comcast.com](mailto:justin_damiano@comcast.com).

Sincerely,

Justin Damiano  
External Affairs

Enclosure

cc: Andy Macke, Comcast

# **COMCAST: MINORITY-OWNED BUSINESS PARTICIPATION PLAN**

## **I. INTRODUCTION**

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.<sup>1</sup>

## **II. TERMS AND TERMINOLOGY**

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

1. “Comcast” refers to Comcast Cable Communications Management, LLC, and 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.
2. “Minority-Owned Business” means a business that is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of the business and who is impeded from normal entry into the economic mainstream because of:
  - a. past practices of discrimination based on race, religion, ethnic background or sex, including, but not limited to, women;
  - b. a disability as defined in T.C.A. § 4-26-102, including, but not limited to, disabled veterans; or
  - c. past practices of racial discrimination against African-Americans.
3. “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:
  - 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 the Minority-Owned Businesses Participation Plan.

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<sup>1</sup> As with any business, Comcast’s plans and programs are subject to change over time, based upon a variety of factors, both within and outside the control of the company. Accordingly, the plans set forth in this submittal are subject to possible change over the period covered by this submission.

### **III. COMCAST'S DIVERSITY EFFORTS GENERALLY**

**Supplier Diversity.** Dependable, diverse partners provide Comcast with the goods and services we need to continue growing and serving our customers. Small and diverse suppliers provide us with new perspectives, insights, and understandings that allow us to be better equipped to innovate and tailor our business to existing and emerging markets. Comcast finds that occasionally it is our small and diverse suppliers who instill competitiveness into the bidding process and make all of our vendors work harder to give us their best possible product or service.

### **IV. COMCAST'S PERFORMANCE WITH REGARD TO WORKFORCE DIVERSITY AND CONTRACTING WITH SMALL AND HISTORICALLY UNDERUTILIZED BUSINESSES**

Comcast's Supplier Diversity Program is designed to promote, increase, and improve the quality of the participation of small and diverse-owned businesses in our supply chain. We are constantly evaluating our supplier base, and that works for everybody. It provides Comcast purchasers with reliable resources; it creates jobs; it strengthens our purchasing power; and it builds value for our shareholders.

Throughout the year, we actively target outreach events and build partnerships with various advocacy organizations across our geographic footprint, participating in numerous conferences, awards ceremonies, capacity-building events, and business opportunity fairs at the local, regional, and national levels.

Our comprehensive governance structure focuses on accountability, responsibility, expectations, and effective management of diversity and inclusion at the highest levels. For example, this commitment is demonstrated in Comcast's annual "Diversity and Inclusion Roadshows," during which our Senior Executive Vice President and Chief Diversity Officer and other senior leaders meet with the Cable Division Presidents and their senior leadership teams to discuss diversity and inclusion best practices.

Our supplier diversity strategy is not a project or a program, but rather the way we conduct business. We believe strongly in providing equal opportunity to all qualified suppliers who participate in the bid process. We strive to facilitate nondiscriminatory business opportunities for small and diverse-owned businesses and are willing to invest in the resources to achieve this goal.

Potential vendors can learn more about participating in Comcast's Supplier Diversity Program on its website, [corporate.comcast.com](http://corporate.comcast.com).

**V. INITIATIVES, PROGRAMS, AND ACTIVITIES COMCAST WILL PURSUE IN THESE AREAS OVER THE PERIOD OF THE PLAN**

In addition to the supplier diversity efforts already outlined in Section I of this submittal, Comcast, during the period of the plan, will utilize a combination of efforts to enhance supplier diversity, including but not limited to the following:

1. Conduct training sessions on supplier diversity;
2. Evaluate each division's supplier diversity plan and recommend strategies for improvement;
3. Strengthen our relationships with regional organizations that support Minority-Owned Businesses;
4. Enhance external communication for supplier diversity; and
5. Increase the spend on diverse suppliers over prior years.

**VI. BUSINESS PARTNERSHIP INITIATIVES TO FACILITATE SMALL AND HISTORICALLY UNDERUTILIZED BUSINESS ENTRY INTO THE CABLE MARKET**

Comcast partners with the Small Business Administration, as well as the organizations below, to help us identify qualified diverse-owned business enterprises that can assist us in our procurement needs, which we hope, in turn, will help our company to better achieve our supplier diversity objectives.

1. **National Minority Supplier Diversity Council ("NMSDC"):** Comcast is a national member of this organization. Additionally, we partner with the local councils to find qualified minority-owned businesses with which to partner.
2. **Women's Business Enterprise National Council ("WBENC"):** Comcast is a national member of this organization. Additionally, we partner with the local councils to find qualified women-owned businesses with which to partner.
3. **Women in Cable and Telecommunications ("WICT"):** This is a cable- specific organization that assists Comcast in identifying women-owned businesses in the cable and telecommunications industry, among other things.
4. **National Association for Minorities in Cable ("NAMIC"):** This is a cable- specific organization that assists Comcast in identifying minority-owned businesses in the cable industry, among other things.
5. **Disability:IN:** This organization unites businesses around disability inclusion in the workplace, supply chain, and marketplace considerations. Disability:IN has more than 130 corporate partners spanning the technology, healthcare, financial, transportation, entertainment, and retail industries.

6. **The National Gay & Lesbian Chamber of Commerce (“NGLCC”)**: This organization supports LGBT business owners and showcases the diversity of talent in the lesbian, gay, bisexual, and transgender communities.
7. **United States Hispanic Chamber of Commerce (“USHCC”)**: This organization actively promotes the economic growth, development, and interests of more than 4.37 million Hispanic-owned businesses that, combined, contribute over \$700 billion to the American economy every year. It also advocates on behalf of 260 major American corporations and serves as the umbrella organization for more than 200 local chambers and business associations nationwide.

## **VII. STATEMENT OF INTENT TO FOLLOW THE MINORITY-OWNED BUSINESS PARTICIPATION PLAN**

Pursuant to this plan, Comcast will strive to maximize participation of Minority-Owned Businesses through both prime and second-tier contracting opportunities and will strive to achieve a level of Minority-Owned 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 Public Utility Commission concerning Comcast’s Minority-Owned Business Participation Plan and compliance with such plan.

Inquiries concerning this plan may be directed to:

Andy Macke  
Vice President, External Affairs  
6200 The Corners Parkway, Suite 200  
Peachtree Corners, Georgia 30092  
678.618.8084

## Appendix 7

# Electric Power Board of Chattanooga



**2020 Annual Report**

**Minority Business Participation Plan Compliance**

**Competitive Cable and Video Services Act**

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

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

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

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

In 2020, EPB's Fiber Optics Division conducted business with nineteen (19) minority owned companies in Tennessee and spent in excess of \$6,104,168 with these companies. The total EPB Fiber dollars spent for that same period with thirty-four (34) minority owned companies was in excess of \$11,408,276.

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

- Hosting a number of M&WOB networking events at EPB throughout 2020;
- Continued partnerships with AABE Board and Chattanooga Minority Connection Group to encourage minority and women-owned businesses to bid on EPB projects;
- Participation by EPB's Minority Business Manager and Purchasing Manager in development events hosted by the TVA, Erlanger, Volkswagen Expo and AABE National for vendors of M&WO Businesses.

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

Appendix 8  
Twin Lakes Communications, Inc.



January 28, 2021

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

Re: TCA 7-59-313

Dear Mr. Kettles:

As required by TCA 7-59-313, Twin Lakes Communications, Inc. provides this annual report concerning the Small and Minority-Owned Telecommunications Business Participation Plan and its compliance with that plan.

The existing Small and Minority-Owned Telecommunications Business Participation Plan remains unchanged for 2021 and Twin Lakes Communications, Inc. continues to comply with this plan. Please find a copy of the plan enclosed.

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

Very truly yours,  
Twin Lakes Communications, Inc.



Jonathan West, General Manager/CEO

JW/mm  
Attachment as stated

**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 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: 

Dated: January 28, 2021

## Appendix 9

# North Central Telephone Cooperative



January 28, 2021

Tennessee Public Utility Commission  
ATTN: Mr. Jerry Kettles  
502 Deaderick Street  
4<sup>th</sup> Floor  
Nashville, Tennessee 37243

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

Dear Mr. Kettles:

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

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

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

Sincerely,

A handwritten signature in blue ink that reads "Johnny L. McClanahan".

Johnny L. McClanahan  
President/CEO

Enclosures

**Lafayette**  
872 Highway 52 Bypass East  
Lafayette, TN 37083  
615.666.2151

**Westmoreland**  
5620 Austin Peay Hwy  
Westmoreland, TN 37186  
615.644.6282

**Scottsville**  
1630 Bowling Green Rd.  
Scottsville, KY 42164  
270.622.7500

[www.nctc.com](http://www.nctc.com)

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

## **I. Purpose**

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

## **II. Definitions**

### **As defined in §65-5-212.**

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

## **III. Administration**

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

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

The Administrator’s responsibilities will include:

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

### **III. Administration (continued)**

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

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

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

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

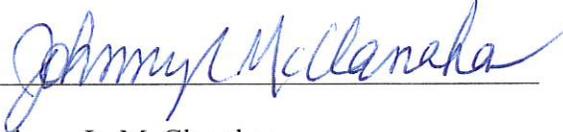
### **IV. Records and Compliance Reports**

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

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

Hereby submitted by:

North Central Communications, Inc.

By: 

Johnny L. McClanahan  
President and CEO

Dated: January 28, 2021

Appendix 10  
TDS Telecom Service Corporation

**TDS Telecom Service Corporation – Tennessee  
January 2021**

**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 Unites States Department of Agriculture Rural Utility Service (RUS) standards.
- (d) Maintains Minority – Owned Businesses related correspondence and record keeping.
- (e) Coordinates activities during the conduct of any compliance review by the Tennessee state agencies.
- (f) Attends or arranges for attendance by appropriate members of management at, Minority Business Enterprise Seminars, Trade Fairs, and Conventions.

## **6.0 PLAN TO ASSURE EQUITABLE OPPORTUNITY**

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

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

6.2 Outreach efforts will be made as follows:

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

## **7.0 PLAN REPORTING**

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

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

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

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

Appendix 11  
Spring City Cable TV, Inc.

# SPRING CITY CABLE

making connections >

January 28, 2021

Tennessee Regulatory Authority  
ATTN: Jerry Kettles\  
502 Deaderick St. 4<sup>th</sup> 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 4, 2021

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

Via email ([jerry.kettles@tn.gov](mailto:jerry.kettles@tn.gov))

Re: Minority Owned Business Participation Plan Annual Report

Dear Mr. Kettles:

Please find the attached Minority Owned Business Participation Plan previously adopted by United Telephone Company (d/b/a United Communications) and its wholly-owned subsidiary, United Communications, Inc. (formerly UTC Video Concepts, LLC). There were no changes to this plan in 2020 and the plan remains in place.

Please let me know if you have any questions or need any additional information. I can be reached at 931.364.4311.

Best regards,

A handwritten signature in cursive script that reads 'Cindy Patterson'.

Cindy Patterson  
Accounting Supervisor

UNITED COMMUNICATIONS

120 Taylor Street | Chapel Hill, TN 37034

1.800.779.2227 | [www.united.net](http://www.united.net)

Appendix 13  
West Kentucky Rural Telephone  
Cooperative

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

**SMALL AND MINORITY – OWNED**  
**TELECOMMUNICATIONS**  
**BUSINESS PARTICIPATION PLAN**

Pursuant to T.C.A. 65-5-112, 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 65-5-112 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 65-5-112 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 65-5-112.

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

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

### **III. ADMINISTRATION**

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

Karen Jackson-Furman, COO  
West Kentucky Rural Telephone Cooperative Corporation, Inc. (dba WK&T)  
100 WK&T Technology Dr.  
Mayfield, Kentucky 42066  
Telephone: 877.954.8748

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with 65-5-112 and the rules and orders of the Tennessee Regulatory Authority.
- (2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.
- (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 65-5-112.
- (5) Searching for and developing opportunities to use small and minority-owned businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.
- (6) Providing records and reports and cooperate in any authorized surveys as required by the Tennessee Regulatory Authority.
- (7) Establishing a record-keeping system to track qualified small and minority-owned businesses and efforts to use such businesses.

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

Chambers of Commerce

The Tennessee Department of Economic and Community Development

The United States Department of Commerce

Small Business Administration

Office of Minority Business

The National Minority Supplier Development Counsel

The National Association of Women Business Owners

The National Association of Minority Contractors

Historically Black Colleges, Universities and Minority Institutions

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

#### **IV. RECORDS AND COMPLIANCE REPORTS**

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

West Kentucky Rural Telephone Cooperative Corporation, Inc.

By:  \_\_\_\_\_

Karen Jackson-Furman  
Chief Operating Officer

Appendix 14  
Millington CATV



phone 870.336.3434 1.888.336.4249 fax 870.336.3401 office 2400 Ritter Drive, Jonesboro, AR 72401 [www.getritter.info](http://www.getritter.info)

January 31, 2021

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

RE: Minority-Owned Business Participation Plan Report for 2020

Dear Mr. Kettles:

Please find the attached the Minority Owned Business Participation Plan adopted by Millington CATV, LLC dba Ritter Communications as required by Tenn. Code Ann. § 7-59-313.

In 2020, we are pleased to report the Company paid Minority-Owned businesses \$24,198 dollars.

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

Best regards,

A handwritten signature in black ink, appearing to read "Jeff B. Shipman", written over a horizontal line.

Jeff B. Shipman  
E. Ritter Communications Holdings, LLC  
Director, Purchasing & Inventory  
2400 Ritter Drive  
Jonesboro, AR 72401  
Ph. 870-336-3480

**Millington CATV, LLC**

**MINORITY-OWNED  
BUSINESS PARTICIPATION PLAN**

Millington CATV, LLC

**MINORITY-OWNED  
BUSINESS PARTICIPATION PLAN**

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7.0	PLAN REPORTING

**MINORITY-OWNED BUSINESS  
PARTICIPATION PLAN**

**1.0 PLAN**

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

**2.0 DEFINITIONS**

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

**3.0 PLAN RESPONSIBILITY AND POLICY STATEMENT**

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

**4.0 PLAN PERIOD OF EFFECTIVENESS**

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

## **5.0 PLAN ADMINISTRATION**

- 5.1 Millington's Plan Administrator is:

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

- 5.2 The Administrator manages the Plan as described below.

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

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

## **6.0 PLAN TO ASSURE EQUITABLE OPPORTUNITY**

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

- (a) The Millington-approved Master Supplier list.

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

6.2 Outreach efforts will be made as follows:

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

## **7.0 PLAN REPORTING**

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

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

Appendix 15  
Community Television Company

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



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

706.276.2271 800.660.6826  
Fax: 706.276.9888 etcnow.com

January 26, 2021

*Via email Jerry.Kettles@tn.gov*

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

**RE: Community Television Company (CTC);  
2019 Annual Report on Minority-Owned Business Participation Plan as  
required by the Competitive Cable and Video Services Act,  
Tenn. Code Ann. § 7-59-301, et seq. (Act)**

Dear Mr. Kettles:

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

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

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

Warm Regards,

A handwritten signature in black ink that reads "Cora Payne".

Cora Payne  
Executive Secretary  
Administration Department Manager

Enclosure

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

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

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

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

## Appendix 16

Infostructure, Inc. dba ClickOne.Net

# 1 TENNESSEE

January 29th, 2021

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

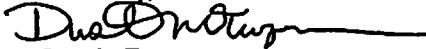
Dear Mr. Kettles,

Enclosed is InfoStructure Inc.'s (dba 1Tennessee) Minority Vendor Outreach program for 2021.

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  
Chief Technical Officer  
314 N 22<sup>nd</sup> Ave  
Humboldt, TN 38343

Attachments: Minority Status Request Form

Outreach List  
Minority Vendor Program Letter  
Local Agency Outreach Program Cover Letter

# 1TENNESSEE



Infostructure, Inc. (dba 1Tennessee) Minority Vendor Outreach Program  
Local Agency Outreach List

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

# 1TENNESSEE



Dear Sir,

1Tennessee has developed an outreach plan for minority vendors and suppliers in accordance with the State of Tennessee Competitive Cable and Video Services Act T.C.A. § 7-59-313(d). As an element of this plan 1Tennessee is contacting you to request information regarding minority vendors and suppliers in our area. We respectfully request your assistance in completing and returning the enclosed documents at your earliest convenience.

1Tennessee  
Dustin Twyman  
Chief Technical Officer  
314 N 22<sup>nd</sup> Ave  
Humboldt, TN 38343

# 1TENNESSEE



Date

Dear [Future Vendor/Supplier],

InfoStructure Inc. (DBA 1Tennessee) 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 1Tennessee. If you are interested in being considered as a potential vendor/supplier, please fill out the enclosed form and documents and return it to:

1Tennessee  
Attn: Dustin Twyman  
Chief Technical Officer  
314 N 22<sup>nd</sup> Ave  
Humboldt, TN 38343

We look forward to your response.

Sincerely,

Dustin M Twyman  
Chief Technical Officer  
InfoStructure Inc. (DBA 1Tennessee)

**Infostructure, Inc. (dba 1Tennessee)  
Minority Vendor Outreach Program**

**TENNESSEE**

**Vendor Information**

**Physical Address:**

**Name**

**Address**

**City**

**State**

**Zip**

**Phone #**

**Email Address**

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**Briefly Describe Services Offered by Vendor**


**Type of Business (check one):**

**Individual**

**Partnership**

**Corporation**

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**Minority Status:**

**African American**

**Asian Indian**

**Asian Pacific**

**Hispanic**

**Native American**

**Caucasian**

**Male**

**Female**

Male	Female

**N/A**

**Signature:**

**Printed Name**

**Title:**

**Date**

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# Appendix 17

## Crystal Clear Technologies



**Crystal Clear**  
Fiber Optic Broadband Provider

January 28, 2021

Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

To Whom It May Concern:

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

Sincerely,

Lucas Sullivan  
General Manager  
Crystal Clear Technologies, LLC

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

[www.crystalclearfiber.com](http://www.crystalclearfiber.com)

**Crystal Clear, LLC**  
**Minority Owned Business Participation Plan**

**PURPOSE:**

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

**DEFINITIONS:**

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

**POLICY STATEMENT:**

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

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

**IMPLEMENTATION OF PLAN:**

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

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

**ADMINISTRATION OF PLAN:**

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

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

**PLAN ADMINISTRATOR:**

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

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

The duties of the Administrator include the following:

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

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

**COMPLIANCE REPORTS:**

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

**RECORD MAINTENANCE:**

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

# Appendix 18

## SVE Connect

**SEQUACHEE VALLEY ELECTRIC 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, Sequachee Valley Electric Cooperative, Inc. ("SVEC") 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**

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

T. Michael Partin, CEO  
Sequachee Valley Electric Cooperative, Inc.  
512 South Cedar Ave  
P. O. Box 31  
South Pittsburg, 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 SVEC 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

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

SEQUACHEE VALLEY ELECTRIC COOPERATIVE, INC.

By:



**T. Michael Partin, CEO**

# Appendix 19

## Holston Connect

**HOLSTONCONNECT, LLC**

**2021  
SMALL AND MINORITY-OWNED  
BUSINESS PARTICIPATION PLAN**

Pursuant to the Competitive Cable and Video Services Act, Public Chapter 932 and in compliance with T.C.A. § 7-59-313(d), as amended, HolstonConnect, LLC (“Holston”) submits this Small and Minority-owned Business Participation Plan (the "Plan") in compliance with the obligations and requirements of providing competing cable and video services in Tennessee.

## I. PURPOSE

The purpose is to provide opportunities for small and minority-owned business to provide goods and services to video service providers. Holston is committed to these goals and to taking steps to support the participation of small and minority-owned businesses in the industry. Holston 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, Holston will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to Holston of such opportunities. Holston's representatives have already contacted the Department of Economic and Community Development, moreover, Holston 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

**Minority-Owned Business.** Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000.00).

**Small Business.** Small Business shall mean a business with annual gross receipts of less than four million dollars (\$4,000,000.00).

**Disability.** A disability as defined in T.C.A § 4-26-201 including, but not limited to, disabled veterans.

## III. ADMINISTRATION

Holston'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 Holston's full efforts to provide equal opportunities for small and minority businesses. The Administrator of the Plan will be:

James B. Sandlin  
PO Box 190, 1200 West Main Street, Rogersville, TN 37857  
423-272-1020  
jsandlin@holstonelectric.com

The Administrator's responsibilities will include:

- (1) maintaining an updated Plan in full compliance with the rules and orders of the Tennessee Commission.
- (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 Commission, including the filing of required annual updates.
- (4) serving as the primary liaison to and cooperate with the Tennessee Commission, other agencies of the State of Tennessee, and small and minority-owned businesses to locate and use qualified small and minority-owned businesses.
- (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 Commission.
- (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 Holston 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 intends to utilize a number of resources, including:

Chambers of Commerce  
The Tennessee 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 business are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned business will include offering, where appropriate and feasible, small and minority-owned business assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

#### IV. RECORDS AND COMPLIANCE REPORTS

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

Holston will submit records and reports required by the Tennessee Commission concerning the Plan. Moreover, Holston will cooperate fully with any surveys and studies required by the Tennessee Commission.

HolstonConnect, LLC

By: /s/ James B. Sandlin  
General Manager

Dated: January 13, 2021

# Appendix 20

## Gibson Connect



1207A South College Street, Trenton, TN 38382  
P (731) 562-6000

January 29, 2021

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

RE: Minority Owned Business Participation Plan (2020)

Dear Mr. Kettles:

Please find attached the Minority-Owned Business Participation Plan that Gibson Connect, LLC previously adopted and submitted as part of its application for a state-issued video franchise. The Plan remains in effect and has not been amended.

Gibson Connect is a new video provider in the start-up phase of its business. Gibson Connect began connecting its first pay customers in December 2019 and now has customers in Madison, Gibson, Crockett, Obion and Lake counties of Tennessee.

Gibson Connect remains committed to fulfilling the requirements of its Minority-Owned Business Plan for the purchase of goods and services. We will continue working to identify minority-owned businesses by fostering relationships within relevant communities, and we will make available information within these communities on opportunities to work with Gibson Connect. As with our parent company, it is the intent of Gibson Connect to maximize participation of minority-owned businesses, and we aim to achieve a level of minority-owned business participation representative of the population of the demographics of the state of Tennessee.

If you have any questions or need anything else, please do not hesitate to contact me.

Best Regards,

A handwritten signature in cursive script that reads 'Charles Phillips'.

Charles Phillips  
VP of Operations

**Gibson Connect, LLC**

**Minority-Owned Business Participation Plan**

Pursuant to Tenn. Code Ann. § 7-59-313, this Minority-Owned Business Participation Plan (the "Plan") sets forth the plan of Gibson Connect, LLC ("Provider") to actively solicit bids from, and let contracts to, minority-owned businesses when establishing, providing, or expanding cable or video services and/or broadband Internet service and related support facilities.

- 1) **Minority-Owned Business.** "Minority-owned business" means a business that is solely owned, or at least fifty-one percent (51 %) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of the business and who is impeded from normal entry into the economic mainstream because of:
  - a. Past practices of discrimination based on race, religion, ethnic background or sex, including, but not limited to, women;
  - b. A disability as defined in Tenn. Code Ann. § 4-26-102, including, but not limited to, disabled veterans; or
  - c. Past practices of racial discrimination against African-Americans.
- 2) **Supplier Diversity Policy Statement.** It is the policy of the Provider 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 the Provider. The Provider also encourages subcontracting opportunities from minority-owned businesses.
- 3) **Promotion of Opportunities for Minority-Owned Businesses.** The Provider's management, procurement, and human resources personnel work to identify goods and services that may be supplied by minority-owned businesses. When possible, the Provider seeks proposals, and makes purchases, from qualified minority-owned businesses. The Provider also seeks to foster relationships within minority-owned business communities.
- 4) **Technical Assistance to Minority-Owned Businesses.** The Provider provides information for minority-owned businesses upon request.
- 5) **Statement of Intent.** Under the Plan, the Provider 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, the Provider will prepare and submit an annual report to the Tennessee Public Utilities Commission concerning the Plan and the Provider's compliance with the Plan.

# Appendix 21

## Meriwether Lewis Connect

**MERIWETHER LEWIS CONNECT, LLC  
SMALL AND MINORITY-OWNED BUSINESS  
PARTICIPATION PLAN**

**TABLE OF CONTENTS**

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

## 1.0 PURPOSE

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

## 2.0 DEFINITIONS

- 2.1 **"MLConnect"** - For the purpose of this Plan, MLConnect shall include Meriwether Lewis Connect, LLC, a wholly-owned subsidiary of Meriwether Lewis Electric Cooperative
- 2.2 **"Minority Owned Business"** - (as defined in T.C.A. § 65-5-112) "Minority-Owned Business" shall mean a business which is solely owned, or at least fifty-one percent (51%) of the outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or

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

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

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

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

### **3.0 POLICY STATEMENT & ADMINISTRATION**

**3.1** It is the policy of MLConnect to afford Small Businesses and Minority-Owned Businesses and opportunity to participate in the performance of contracts in accordance with T.C.A. § 65-5-112 and T.C.A. § 7-59-313.

**3.2** MLConnect's Plan will be overseen and administered by the individual named below, which may change from time-to-time, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting MLConnect's full efforts to provide equal opportunities for Small Business and Minority-Owned Businesses.

**3.3** The Administrator of the Plan **will be** :

Keith Carnahan  
President & CEO  
1625 Highway 100  
Centerville, Tennessee 37033  
Telephone: 931.729-3558: Fax: 931.729-9671

**3.4** The Administrator's specific job duties, as they relate to this Plan are as follows:

- A. Maintaining an updated plan in full compliance with T.C.A. § 65-5-112 and T.C.A. § 7-59-313 and the rules and orders of the Tennessee Regulatory Authority.
- B. Establishing and developing policies and procedures for the successful implementation of the Plan.
- C. Preparing and submitting such forms as may be required by the Tennessee Regulatory Authority, including the filing of required annual updates.
- D. Serving as the primary liaison to and cooperate with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and

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

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

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

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

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

#### **4.0 RECORDS AND COMPLIANCE REPORTS**

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

Appendix 22  
Johnson City Energy Authority  
d/b/a Brightridge

**Johnson City Energy Authority dba BrightRidge**

**2021  
MINORITY-OWNED  
BUSINESS PARTICIPATION PLAN**

Pursuant to the Competitive Cable and Video Services Act, Public Chapter 932 and in compliance with T.C.A. § 7-59-313, as amended, Johnson City Energy Authority dba BrightRidge (“BrightRidge”) submits this Minority-owned Business Participation Plan (the "Plan") in compliance with the obligations and requirements of providing competing cable and video services in Tennessee.

## I. PURPOSE

The purpose is to provide opportunities for minority-owned business to provide goods and services to video service providers. BrightRidge is committed to these goals and to taking steps to support the participation of minority-owned businesses in the industry. BrightRidge 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, BrightRidge will make efforts to identify and inform minority-owned businesses that are qualified and capable of providing goods and services to BrightRidge of such opportunities. BrightRidge's representatives have already contacted the Department of Economic and Community Development, moreover, BrightRidge 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

**Minority-Owned Business.** Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000.00).

**Disability.** A disability as defined in T.C.A § 4-26-201 including, but not limited to, disabled veterans.

## III. ADMINISTRATION

BrightRidge'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 BrightRidge's full efforts to provide equal opportunities for minority businesses. The Administrator of the Plan will be:

Brian Bolling  
CFO & Chief Customer Officer  
BrightRidge  
2600 Boones Creek Rd.  
Johnson City, TN 37615  
Main Office Number 423-952-5000

The Administrator's responsibilities will include:

- (1) maintaining an updated Plan in full compliance with the rules and orders of the Tennessee Commission.
- (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 Commission, including the filing of required annual updates.
- (4) serving as the primary liaison to and cooperate with the Tennessee Commission, other agencies of the State of Tennessee, minority-owned businesses to locate and use qualified minority-owned businesses.
- (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 cooperate in any authorized surveys as required by the Tennessee Commission.
- (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 BrightRidge and training such persons to seek out, encourage, and promote the use of minority-owned businesses.

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

Chambers of Commerce  
The Tennessee Department of Commerce  
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 minority-owned business are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to minority-owned business will include offering, where appropriate and feasible, minority-owned business assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

#### IV. RECORDS AND COMPLIANCE REPORTS

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

BrightRidge will submit records and reports required by the Tennessee Commission concerning the Plan. Moreover, BrightRidge will cooperate fully with any surveys and studies required by the Tennessee Commission.

BrightRidge

By: /s/ Brian Bolling  
CFO & Chief Customer Officer

Dated: January 23, 2021

# Appendix 23

## Point Broadband Fiber Holdings



January 25, 2021

Chairman, Tennessee Public Utility Commission  
c/o Dockets and Records Manager  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

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

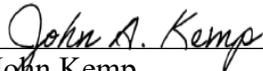
Dear Chairman:

Point Broadband Fiber Holding, LLC received its Certificate of Public Convenience and Necessity ("CPCN") per the Tennessee Public Utility Commission's Order dated October 11, 2019 (Docket No. 19-00054). Point Broadband Fiber Holding, LLC filed its Small and Minority-Owned Telecommunications Business Participation Plan ("Plan") with its CPCN Application in June 2019.

In accordance with the Tennessee Code, Point Broadband Fiber Holding, LLC file this letter and the enclosed Plan and states there have been no changes to the Plan.

Thank you.

Sincerely,

  
\_\_\_\_\_  
John Kemp  
Associate General Counsel  
Point Broadband

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

Pursuant to T.C.A. §65-5-112, as amended, Point Broadband Fiber Holding, LLC submits this small and minority-owned Telecommunications business participation plan (the “Plan”) along with its Application for a Certificate of Public Convenience and Necessity to provide competing intrastate and local exchange services in Tennessee.

### **I. PURPOSE**

The purpose of §65-5-112 is to provide opportunities for small and minority-owned businesses to provide goods and services to telecommunications service providers. Point Broadband Fiber Holding, LLC is committed to the goals of §65-5-112 and to taking steps to support the participation of small and minority-owned telecommunications businesses in the telecommunications industry. Point Broadband Fiber Holding, LLC 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, Point Broadband Fiber Holding, LLC will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to Point Broadband Fiber Holding, LLC of such opportunities. Point Broadband Fiber Holding, LLC’s representatives have already contacted the Department of Economic and Community Development, the administrator of the small and minority-owned telecommunications assistance program, to obtain a list of qualified vendors. Moreover, Point Broadband Fiber Holding, LLC will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

**SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS  
PARTICIPATION PLAN (cont'd)**

**II. DEFINITIONS**

As defined in §65-5-112.

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

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

**III. ADMINISTRATION**

Point Broadband Fiber Holding, LLC'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 Point Broadband Fiber Holding, LLC's full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Chad Wachter, General Counsel  
Point Broadband Fiber Holding, LLC  
1791 O.G. Skinner Drive, Suite A  
West Point, GA 31833  
Telephone: 706-773-2663

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with §65-5-112 and the rules and orders of the Tennessee Public Utility Commission.

**SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS  
PARTICIPATION PLAN (cont'd)**

- (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 Public Utility Commission, including the filing of required annual updates.
- (4) Serving as the primary liaison to and cooperate with the Tennessee Public Utility Commission, 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 §65-5-112.
- (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 Public Utility Commission.
- (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 CLEC A 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

**SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS  
PARTICIPATION PLAN (cont'd)**

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**

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

Point Broadband Fiber Holding, LLC will submit records and reports required by the Tennessee Public Utility Commission concerning the Plan. Moreover, Point Broadband Fiber Holding, LLC will cooperate fully with any surveys and studies required by the Tennessee Public Utility Commission.

Point Broadband Fiber Holding, LLC

By: /s/ Chad Wachter  
Chad Wachter  
General Counsel

Dated: June 3, 2019

# Appendix 24

## Advantage Cellular Systems



*Sent via email: jerry.kettles@tn.gov*

June 10, 2021

Jerry Kettles  
Director, Economic Analysis  
Tennessee Public Utility Commission  
502 Deaderick Street, Fourth Floor  
Nashville, TN 37243

RE: Minority Owned Business Participation Plan

Dear Mr. Kettles:

In accordance with Tennessee Code 7-59-313 and the Competitive Cable and Video Services Act, Advantage Cellular Systems, Inc. d/b/a DTC Communications submits this annual report of compliance with its Minority-Owned Business Participation Plan.

The enclosed Minority-Owned Business Participation Plan that was approved in TPUC Doc. No. 20-00044 remains unchanged, and DTC Communications continues to comply with this plan.

Please contact me if you have any questions or need further information.

Respectfully,

A handwritten signature in blue ink that reads 'Christopher E. Townson'.

Christopher E. Townson  
CEO

Encl.

**ADVANTAGE CELLULAR SYSTEMS, INC. D/B/A DTC COMMUNICATIONS**  
**MINORITY-OWNED TELECOMMUNICATIONS**  
**BUSINESS PARTICIPATION PLAN**

Pursuant to T.C.A. §§ 7-59-305(c)(11) and 7-59-313, Advantage Cellular Systems, Inc. d/b/a DTC Communications. (“DTC”) submits this 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 video service providers. DTC is committed to the goals of § 7-59-313 and to taking steps to support the participation of minority-owned businesses in the video-cable industry. DTC 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, DTC will make efforts to identify and inform minority-owned businesses that are qualified and capable of providing goods and services to DTC of such opportunities. DTC’s representatives have already contacted the Department of Economic and Community Development to obtain a list of qualified vendors. Moreover, DTC 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 means a business that is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the daily operations of the business and who is impeded from normal entry into the economic mainstream because of past practices of

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

### **III. ADMINISTRATION**

DTC'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 DTC's full efforts to provide equal opportunities for minority-owned businesses. The Administrator of the Plan will be:

Christopher E. Townson  
111 High Street  
P.O. Box 247  
Alexandria, TN 37012  
Tel: (615) 464-2303  
Email: CTownson@staff-dtc.com

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 Public Utility Commission;
- (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 Public Utility Commission, including the filing of required annual updates;
- (4) Serving as the primary liaison to and cooperating with the Tennessee Public Utility Commission, other agencies of the State of Tennessee, and minority-owned businesses to locate and use qualified 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 Public Utility Commission;
- (7) Establishing a recordkeeping system to track qualified minority-owned businesses and efforts to use such businesses; and
- (8) Providing information and educational activities to persons within DTC 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

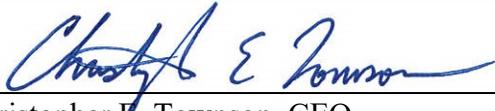
The efforts to promote and ensure equal opportunities for minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to minority-owned businesses will include offering, where appropriate and feasible, minority-owned businesses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

#### **IV. RECORDS AND COMPLIANCE REPORTS**

DTC will maintain records of qualified minority-owned businesses and efforts to use the goods and services of such businesses. In addition, DTC will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this Plan. DTC will submit records and reports required by the Tennessee Public Utility

Commission concerning the Plan. Moreover, DTC will cooperate fully with any surveys and studies required by the Tennessee Public Utility Commission.

Advantage Cellular Systems, Inc.  
d/b/a DTC Communications

By:   
\_\_\_\_\_  
Christopher E. Townson, CEO

Dated: June 10, 2021

Appendix 25  
Full Tilt Communications

**Vero Fiber Networks, LLC**

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

Pursuant to T.C.A. §65-5-212, as amended, Vero Fiber Networks, LLC submits this small and minority-owned Telecommunications business participation plan (the "Plan") along with its Application for a Certificate of Public Convenience and Necessity to resell intrastate and local exchange services in Tennessee.

#### **I. PURPOSE**

The purpose of §65-5-212 is to provide opportunities for small and minority-owned businesses to provide goods and services to Telecommunications service providers. Vero Fiber Networks, LLC is committed to the goals of §65-5-212 and to taking steps to support the participation of small and minority-owned Telecommunications businesses in the Telecommunications industry. Vero Fiber Networks, LLC 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, Vero Fiber Networks, LLC will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to Vero Fiber Networks, LLC of such opportunities. Vero Fiber Networks, LLC representatives have already contacted the Department of Economic and Community Development, the administrator of the small and minority-owned Telecommunications assistance program, to obtain a list of qualified vendors. Moreover, Vero Fiber Networks, LLC, will seek to increase awareness of such

opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

## **II. DEFINITIONS**

As defined in §65-5-212.

*Minority-Owned Business.* Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex 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**

Vero Fiber Networks, LLC 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 Vero Fiber Networks, LLC's full efforts to provide equal opportunities for small and minority-owned businesses. The administrator of the Plan will be:

Name: Greg Friedman, Vero Fiber Networks  
Address: 1023 Walnut Street, Suite 100  
City/State: Boulder, CO 80302  
Telephone: 303-350-4060 Ext: 108  
Facsimile: 407-260-1033  
Email: gfriedman@veronetworks.com

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 business 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 cooperates in any authorized surveys and 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 CLECI 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**

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

Vero Fiber Networks, LLC will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. Moreover, Vero Fiber Networks, LLC will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

Vero Fiber Networks, LLC

By:   
Greg Friedman  
CFO

Dated: May 10, 2021