

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION, et al.,)

Plaintiffs,)

v.)

Civil Action No. 73-149

AMERICAN TELEPHONE AND TELE-)
GRAPH COMPANY, et al.,)

Defendants.)

FILED

JUN - 5 1975
JOHN J. HADDING, Clerk

AFFIDAVIT OF DONALD E. LIEBERS

NEW YORK,)
) SS
NEW YORK)

DONALD E. LIEBERS, being first duly sworn, deposes and says:

(1) I am Personnel Director, Employment & Equal Opportunity for American Telephone & Telegraph Company, 195 Broadway, New York, New York 10007.

(2) In that capacity, I have been involved in the supervision of compliance with the Consent Decree entered into in 1973 and the implementation of the Affirmative Action Plans of the various Operating companies. I have also represented AT&T in negotiations with the Government Coordinating Committee and in discussions with the Intervenors herein concerning compliance procedures and affirmative action obligations.

(3) It was the understanding of AT&T that the Consent Decree required the companies to override employee selection standards contained in the collective bargaining agreements with the Intervenors in order to reach targets and goals approved by the Government in 1973

(4) Where operating companies failed to meet their 1973 targets, and those deficiencies were attributed to the failure of the company to make more extensive use of the override, the Government Coordinating Committee alleged that the company had failed to comply in good faith with the Consent Decree.

(5) Table I, annexed hereto, sets forth the companies' aggregate placements of target groups and overrides for 1973 and 1974 and is, to the best of my knowledge and belief, a true and accurate representation thereof.

Placements and Overrides: 1973/74	
Total Number of Hires and Promotions of Target Groups in Job Classifications 5-15	112,518
Total Number of Times Override was used	28,856
Overrides as a Percent of Hires and Promotions	$\frac{28,856}{112,518}$

Donald E. Liebers
DONALD E. LIEBERS

Subscribed and sworn to before me this 3rd day of June, 1975.

Ruth M. Berge
NOTARY PUBLIC

RUTH M. BERGE
Notary Public, State of New York
No. 43-0253700
Qualified in Richmond County
Cert. filed in New York County
Commission Expires March 30, 1977.

TABLE I

Bell System Affirmative Action
Placements and Overrides: 1973/74

Total Number of Hires and Promotions of Target Groups in Job Classifications 5-15	112,518
Total Number of Times Override was used	28,856
Overrides as a Percent of Hires and Promotions $\frac{28,856}{112,518}$	25.6%