

A MODEL AFFIRMATIVE ACTION
PROGRAM FOR THE
BELL SYSTEM

- 1) does have targets for ♀ & min
in mgt jobs, but not
IMDP
- 2) discusses AA override in
addendum but not
sure of it what I think is
AA override
Seems to mean higher but not immediate measure
- 3) doesn't give specific #s for goals
as Copus suggest were agreed on

American Telephone & Telegraph Company
Human Resources Development Department
195 Broadway
New York, New York 10007
1/10/73
Replacing Issue of 9/11/72

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I PURPOSE AND POLICY

A. PURPOSE OF AFFIRMATIVE ACTION PROGRAM

The Telephone and Telegraph Company's Affirmative Action Program is a set of specific and result oriented procedures to which the company is committed. The procedures coupled with our good faith efforts will insure equal employment opportunity.

This document is the Telephone and Telegraph Company's corporate (Companywide) Affirmative Action Program. A separate program for each major subdivision of the Telephone and Telegraph Company, including the corporate headquarters and "establishments"* within a major subdivision, has also been developed.

*Section IV, C

B. EQUAL EMPLOYMENT OPPORTUNITY POLICY

It is the policy of the _____ Telephone and Telegraph Company to hire well qualified people to perform the many tasks necessary in providing high quality telephone service at reasonable costs. An integral part of this policy is to provide equal employment opportunity for all persons for employment and to recruit and administer hiring, working conditions, benefits and privileges of employment, compensation, training, appointments for advancement including upgrading and promotion, transfers, and terminations of employment including layoffs and recalls for all employees without discrimination because of race, color, religion, national origin, sex or age.

D. REAFFIRMATION

This document represents a reaffirmation of the _____ Telephone and Telegraph Company's policy to provide equal employment opportunity in all personnel actions for all persons for employment and to recruit and administer hiring, working conditions, benefits and privileges of employment, compensation, training, appointments for advancement including upgrading and promotion, transfers, and terminations including layoffs and recalls for all employees without discrimination because of race, color, religion, national origin, sex or age.

In addition, it is the policy of the _____ Telephone and Telegraph Company that local, state and federal laws and regulations implementing national equal employment opportunity objectives shall be fully complied with, not only by meeting the letter of the law and contractual requirements, but by carrying out the full spirit as well.

The _____ Telephone and Telegraph Company further pledges itself to a program of aggressive affirmative action aimed at assuring true equality of employment and a work environment without discrimination.

As the nature of our business grows more complex, the very best skills and talent will be required to meet the needs of our customers. New efforts will be expended to utilize a greater amount of technical and managerial talent among women and minority groups. Therefore, the Company's affirmative action efforts are designed to be the quickest possible and least disruptive paths to the objectives of full utilization of minority group and women employees at every level of the business.

The _____ Telephone and Telegraph Company is totally and irrevocably committed to a good faith effort to meet intermediate targets on schedule so as to provide the opportunity for all employees to perform at full capacity in accordance with their qualifications and interests.

Each manager at every level of the business is responsible for achieving intermediate targets just as certainly as he or she is held accountable for results in the areas of service, profit, community and employee relations.

E. EQUAL EMPLOYMENT PROGRESS

The _____ Telephone and Telegraph Company has had an extensive program of affirmative action for many years. In addition to the Company's internal and external employment related programs, it has been active and influential in organizing and assisting business, community and public agencies to work together toward the solution of urban problems. The Company has earned recognition for its accomplishments in this field from organizations that represent the minority, women's and business communities. Examples of such awards are _____, _____, and _____.

1. Background

The _____ Telephone and Telegraph Company reaffirmed its long-standing corporate policy of equal employment opportunity in the Plan for Progress agreement signed in 196_. Plan for Progress was a voluntary effort by the leadership of American business and industry to participate in the promotion and implementation of equal employment opportunity.

The National Alliance of Businessmen was formed in 1968. From its inception, the Bell System has supported their organizational concepts and objectives both in time and financial support. In 1969, the National Alliance of Businessmen merged with Plan for Progress. The concern of all member companies is not merely with the promotion of equal opportunity programs within their own corporate structures, but also with the conditions and circumstances in their communities that contribute to inequality of opportunity. The National Alliance of Businessmen has grown in membership. Through 1971, approximately 29,000 industrial organizations, retail firms, and financial institutions held membership. The permanent administrative staff is located in Washington, D. C. and includes business executives on loan from member companies. Currently, _____ from _____ is loaned to the National Alliance of Businessmen.

Initially through Plan for Progress and now with the National Alliance of Businessmen, business and industry agree to go beyond the letter of equal employment opportunity laws and to develop programs to end discrimination and to increase job opportunities for minorities.

2. Current Programs

Through the use of effective recruiting techniques, manpower training programs, community relations efforts,

advertising and numerous other methods, the number of minorities on the _____ Telephone and Telegraph Company's payroll has risen.

3. Minority Progress

Between 1965 and 197_, the total number of _____ Telephone and Telegraph Company employees increased _____ per cent. During this same period, the total number of minority employees increased from _____ per cent to _____ per cent and the number of minorities in the management force rose from _____ per cent to _____ per cent. (Exhibit #1)

Since 1965, the hiring rate for minorities as compared to total hires has risen steadily from _____ per cent in 1965 to _____ per cent in 197_.

4. Women's Progress

Women presently constitute _____ per cent of the _____ Telephone and Telegraph Company's total number of employees. Between 1965 and 197_, the number of women in the management ranks rose from _____ per cent to _____ per cent. (Exhibit #2)

Large numbers of women have held management positions in the Commercial, Traffic and Accounting Departments for many years. Most management women have been concentrated in first level positions. Gains are being made in promoting women to second level jobs. The _____ Telephone and Telegraph Company currently has _____ second level women. In addition, _____ women hold third level and above management assignments. Through recruiting efforts and internal developmental programs, _____ per cent of the total number of employees currently in third level and above management positions are women.

5. Summary

The figures illustrate that the _____ Telephone and Telegraph Company is making progress in the employing and upgrading of minorities. The figures also demonstrate that women are progressing in the business. However, they reveal more remains to be done in order for the _____ Telephone and Telegraph Company to reach its stated objective.

II POLICY DISSEMINATION

A. POLICY DISSEMINATION

Specific review of performance of the _____ Telephone and Telegraph Company's Equal Employment Opportunity Policy is made at Vice Presidents' conferences at least semi-annually. A record of these meetings is maintained.

The corporate personnel staff continuously provides assistance to field managers, urban affairs groups and personnel committees. The personnel staff coordinates ideas aimed at employing and upgrading of minority persons and women. They are also responsible for keeping other staff organizations informed about equal employment opportunity legislation, employment, upgrading opportunities and other special Company activities.

1. Internal Policy Dissemination

- a) Our Company's equal employment opportunity policy is included in the System's Instructions, which are the major policy guidelines by which we operate. In addition, this policy has been incorporated into all management handbooks.
- b) Our Company's equal employment opportunity policy and affirmative action program are featured periodically in employee newspapers, magazines, bulletins and annual report. In addition, the Company's urban affairs activities are periodically presented to employees through existing Company news media, special bulletins and brochures.
- c) Special meetings are held with all our management employees for the express purpose of informing them about our Company's equal employment opportunity policy and our affirmative action program. The agendas of these meetings include a statement from our Company President defining support of the program. In addition, individual management responsibility for program effectiveness is precisely outlined. Records of management attendance are maintained to insure that all management employees have been present at these meetings.
- d) New management hires and appointees attend an affirmative action presentation within 120 days of their assumption of a management job title.
- e) The Company's affirmative action program is communicated to all nonmanagement employees. This policy dissemination technique is implemented by management employees at departmental or staff meetings. These

presentations explain how employees can avail themselves of program benefits. Employee responsibility is detailed and employees are afforded an opportunity to discuss the program. Employee attendance is documented to assure complete coverage.

- f) Equal employment opportunity and the Company's social commitment are a part of the Company's induction programs for new employees.
- g) Union officials are advised verbally and in writing about our Company's equal employment opportunity policy and their cooperation has been confirmed. The 1971 union agreement with our Company includes the following non-discrimination clause: "In a desire to restate their respective policies, neither the Company nor the Union shall unlawfully discriminate against any employee because of such employee's race, color, religion, sex, age, or national origin."
- h) Articles covering our equal employment opportunity programs, progress reports, promotions, etc. of minority and women employees are published in our company publications.
- i) All our employee handbooks and similiar publications show both minority and nonminority, both men and women.
- j) Our equal employment opportunity policy is posted on our company bulletin boards.
- k) Management and other employees engaged in employment, placement, training and transfer processing receive additional training on the applicable local, state and federal equal employment opportunity laws. Our Company affirmative action program is covered in depth with all employees working in employment related jobs. In addition, their individual responsibility in assisting the Company in meeting its affirmative action objectives is clearly outlined.

2. External Policy Dissemination

- a) All major recruiting sources, including minority and women's organizations, community agencies, community leaders, high schools, vocational and technical schools, junior colleges and colleges are informed both verbally and in writing of our Company equal employment opportunity policy. These sources are requested to actively recruit and refer minorities and women for all positions for which we normally hire.

- b) Advertisements for employment are placed in the minority news media as well as other news media. When employees and non-employees are featured in employment advertisements both minority and non-minority men and women are pictured. All employment advertisements contain the phrase, "An Equal Opportunity Employer", and where no joint male-female column is available ads are placed under both the "Male" and "Female" columns.
- c) Company product or service advertising features employees and non-employees of minority and non-minority groups and both men and women.
- d) Our company communicates to prospective employees the existence of our affirmative action program and how they can avail themselves of its benefits.
- e) A statement relating to the equal opportunity requirements of various Federal Executive Orders (e.g. 11246) and various implementing regulations is made a part of our contracts, order forms, leases, etc. (Exhibit 3). In addition, a more detailed document is executed with all suppliers providing goods or services to our Company amounting to \$10,000 or more annually (Exhibit 4).
- f) Our Company affords the maximum practicable opportunity for minority business enterprises to participate in our contracts and to act as suppliers of goods and services to the Company as is required in Part 1-1, Chapter 1 of Title 41 of the Code of Federal Regulations (Exhibit 5).

3. Equal Employment Opportunity Posters

The following posters are permanently displayed in a conspicuous place in all buildings in which employees are located and in employment, testing and reception areas.

- | | | |
|-----|--------------------|--|
| *1. | GPO 1970 0-387-525 | Equal Employment Opportunity
is the Law |
| 2. | GPO 1971 0-422-800 | Age Discrimination |
| 3. | (poster number) | (State Equal Employment
Opportunity Poster) |

*These posters appear in both English and Spanish in employment offices where substantial number of applicants are Spanish Surnamed Americans.

Notices informing employment applicants that discrimination complaints can be filed with the Federal Communication Commission are placed at the bottom of the "Equal Employment Opportunity is the Law" poster in all employment offices. These notices appear in English and in Spanish, where a substantial number of applicants are Spanish Surnamed Americans, and are placed at the bottom of Spanish language posters.

III RESPONSIBILITY

A. CORPORATE

The President of the _____ Telephone and Telegraph Company has the overall responsibility for our Company's equal employment opportunity policy. The Corporate Vice President - Personnel Relations is specifically delegated responsibility for administration of the policy and of our affirmative action program. The Assistant Vice President - Personnel Relations has the responsibility of ensuring that all necessary action is taken by all levels of management to achieve our Company's equal employment opportunity objectives. These responsibilities include, but are not limited to:

1. developing our affirmative action program and policy
2. ensuring that our Company policies regarding equal employment opportunity are communicated to all levels within the organization
3. monitoring our Company's performance through audit and reporting systems to assure effectiveness
4. ensuring that hiring, promotion, and salary administration practices are fair and fully consistent with our Company policy
5. identifying problem areas and establishing programs to aid in problem solving.

The Vice President and General Counsel is responsible for assuring that the personnel relations department is properly informed about all local, state and federal regulations affecting equal employment opportunity. This executive advises the Vice President - Personnel Relations regarding steps that must be taken to ensure compliance. The Vice President - Personnel Relations in turn disseminates new policy guidelines to the various levels of the Company and works to implement various programs and ensures compliance.

B. EQUAL EMPLOYMENT OPPORTUNITY COORDINATORS

Each major subdivision of the _____ Telephone and Telegraph Company (State, Region, Area, or Major Staff organization) has an Equal Employment Opportunity Coordinator. The coordinators are directly responsible to the Corporate Assistant Vice President - Personnel Relations, but are located within and assigned to a specific Company subdivision.

The Coordinators assist the branch Assistant Vice President - Personnel and staff in preparation of the local affirmative action programs. These management employees advise the Assistant Vice President - Personnel and staff about local problems and propose appropriate corrective action. The EEO Coordinators will receive informal employee complaints, investigate them and report directly to the Assistant Vice President - Personnel if corrective action is necessary.

The Coordinator is personally responsible for conducting semi-annual compliance reviews on the company subdivision which he or she serves. These compliance reviews will identify local problems, describe in detail the nature of the problem, and make recommendations to solve problems and achieve compliance. The compliance review report is submitted directly to the Assistant Vice President - Personnel Relations who takes corrective action where necessary.

Each major company subdivision or establishment document has associated with it a record of the semi-annual summary of their affirmative efforts and progress by an EEO coordinator. All this associated information is available for inspection by governmental compliance agency representatives.

The Coordinators accept service of formal charges by a federal or state agency, conduct an investigation of all facts relevant to the charge, and make recommendations. This information is forwarded directly to the Corporate Assistant Vice President - Personnel Relations for action.

C. MAJOR COMPANY SUBDIVISION

The Vice President and General Manager or Vice President of each State, Region, Area or Major Staff Organization has the overall responsibility for the affirmative action program in the State, Region, Area or Major Staff Organization. The Assistant Vice President - Personnel is specifically delegated responsibility for administration and implementation of the program. These executives make periodic reviews to evaluate the program's effectiveness. They are also responsible for preparation of the local affirmative action documents and for providing, as required, information pertaining to the processing of applicants for employment and the hiring of minority and WOMEN applicants. They have available a complete copy of the program. Newspaper clippings, magazines, brochures, and pamphlets that describe the Company's affirmative action program may be used to supplement the document itself. This executive is designated as his or her organization's manager of the affirmative action program.

Equal employment opportunity for minority group persons and women and urban affairs activities generally are coordinated by two groups.*

1. Interdepartmental Personnel Committee

This is a committee of division level managers responsible for personnel matters in their respective departments. The group meets regularly to review affirmative action activities as well as other personnel-related matters.

This committee is one of the principal communication vehicles for affirmative action information and the group is charged with responsibility to insure compliance with the policy in the Company's sub-units.

2. Interdepartmental Urban Affairs Committee

This committee is generally composed of some of the personnel committee members along with representatives of the public affairs-public relations or information staff responsible for minority relations and urban affairs activities.

The group meets at least monthly to coordinate the total commitment and effort in the field of Affirmative Action and Urban Affairs.

*If applicable to individual company.

This social responsibility commitment is divided into six parts. They are:

- a) Government and minority employee relations
- b) Minority and Female Employment
- c) Training the underqualified
- d) Employee information and training
- e) Urban education relations
- f) Minority community relations

E. MANAGEMENT

It is the personal responsibility of each management employee to provide equal opportunity for all of his or her employees with regard to work assignments, training, transfers, advancements and other conditions and privileges of employment.

Management employees have been informed that their job performance is being evaluated on the basis of their equal employment opportunity efforts and results as well as all other job related criteria.

Supervisors at all levels of management regularly review the progress of their subordinates to be sure that non-discrimination is a fact.

If our Company determines that discrimination, on the basis of race, color, sex, religion, national origin or age, has occurred those responsible will be subject to appropriate disciplinary action, up to and including dismissal, depending on the severity of the case.

IV UTILIZATION AND WORK FORCE ANALYSES

A. UTILIZATION ANALYSES

The _____ Telephone & Telegraph Company conducts separate in-depth utilization analyses at each establishment for minorities and for women (protected groups). The purpose of these utilization analyses is to determine if minorities and/or women are currently being underutilized in one or more of our job classifications.* The results of these utilization analyses then become the basis for establishing the goals and intermediate targets detailed in this document.

The procedure set forth in Section XI will be utilized in connection with the analysis and goal setting called for by Revised Order No. 4, 41 C.F.R. Section 60-2.11(a).

1. Minority Utilization Analysis

In determining if minorities are underutilized in any of our job classifications, the _____ Telephone and Telegraph Company evaluates all of the following factors:

- a) the minority population of the labor area surrounding the facility
- b) the size of the minority unemployment force in the labor area surrounding the facility
- c) the percentage of the minority work force as compared with the total work force in the immediate labor area
- d) the general availability of minorities having requisite skills in the immediate labor area
- e) the availability of minorities having requisite skills in an area in which the _____ Telephone & Telegraph Company can reasonably recruit
- f) the availability of promotable and transferable minorities within our company
- g) the existence of training institutions capable of training persons in the requisite skills, and
- h) the degree of training which the _____ Telephone & Telegraph Company is reasonably able to undertake as a means of making all job classifications available to minorities.

*Section 4, B

2. Women's Utilization Analyses

In determining if women are underutilized in any of our job classifications, the _____ Telephone and Telegraph Company evaluates all of the following factors:

- a) the size of the female unemployment force in the labor area surrounding the facility
- b) the percentage of the female work force as compared with the total work force in the immediate labor area
- c) the general availability of women having requisite skills in the immediate labor area
- d) the availability of women having requisite skills in an area in which the _____ Telephone and Telegraph Company can reasonably recruit
- e) the availability of women seeking employment in the labor or recruitment area of the _____ Telephone and Telegraph Company
- f) the availability of promotable and transferable female employees within our company
- g) the existence of training institutions capable of training persons in the requisite skills, and
- h) the degree of training which the _____ Telephone and Telegraph Company is reasonably able to undertake as a means of making all job classifications available to women.

(Each company must provide an exhibit showing the data available for A-1 and 2 and the source of this information.)

B. JOB CLASSIFICATIONS

The _____ Telephone and Telegraph Company's job titles have been separated into fifteen major classifications known as the Affirmative Action Job Classifications. These job classifications are comprised of one or a group of jobs having similar content, opportunities and wage rates. The following are the classifications and the job titles which are included in each as well as the range of top rates for each classification.

(FOR ILLUSTRATIVE PURPOSES, JOB TITLES HAVE BEEN SUPPLIED. EACH COMPANY MUST PROVIDE A LIST OF MAJOR TITLES FOR EACH CLASSIFICATION. THIS LIST WILL REPLACE THE EXAMPLE INCLUDED HEREIN.)

Affirmative Action Job Classifications

1. Third Level and Above Management \$ _____ /yr. and up
2. Second Level Management \$ _____ /yr. to \$ _____ yr.
3. First Level Management \$ _____ /yr. to \$ _____ yr.
4. Administrative Positions \$ _____ /yr. to \$ _____ yr.
 - a. Management
Examples: Secretary
Service Observing
Supervisor
 - b. Non-Management
Examples: Engineering Assistant \$ _____ /wk. to \$ _____ wk.
Special Clerk
5. Sales workers (non-management only) \$ _____ /wk. to \$ _____ wk.
Examples: Commercial Representative
Directory Advertising Sales
Canvasser
Communications Consultant
plus commission
6. Telephone Craft - Skilled - Outside \$ _____ /wk. to \$ _____ wk.
Examples: PBX Installer-Repairman
Splicer
7. Craft - Skilled - Inside \$ _____ /wk. to \$ _____ wk.
Examples: Estimate (complex) Assigner
Switchman
Test Deskman
Toll Test Deskman

- 8. General Services - Skilled \$ _____ /wk. to \$ _____ wk.
 Examples: Building Mechanic
 Chauffeur
 Draftsman
 Mechanic
 Supplyman
 Supply Chauffeur

- 9. Telephone Craft - Semi-Skilled - Outside \$ _____ /wk. to \$ _____ wk.
 Examples: Lineman
 Splicer's Helper
 Station Installer-Repairman

- 10. Telephone Craft - Semi-Skilled - Inside \$ _____ /wk. to \$ _____ wk.
 Examples: Apparatusman
 Frameman

- 11. Office-Clerical - Skilled \$ _____ /wk. to \$ _____ wk.
 Examples: Business Services Instructor
 Computer Attendant
 Line (simple) Assigner
 Senior Clerk
 Service Analyst
 Service Analyst
 Service Assistant
 Service Representative

- 12. Office-Clerical - Semi-Skilled \$ _____ /wk. to \$ _____ wk.
 Examples: Administrative Clerk
 Dial Assignment Clerk
 Drafting Clerk
 Processing Clerk
 Stenographer

- 13. Office-Clerical - Entry Level \$ _____ /wk. to \$ _____ wk.
 Examples: File Clerk
 Mail Clerk
 Reproduction Clerk
 Routine Clerk
 Typist

- 14. Operators \$ _____ /wk. to \$ _____ wk.

- 15. Service Workers \$ _____ /wk. to \$ _____ wk.
 Examples: Building Maintenance Worker
 Building Messenger
 Cook
 Dining Service Attendant
 Elevator Operator
 House Service Attendant

C. ESTABLISHMENT OR FACILITY

Separate affirmative action programs including goals, intermediate targets and time frames have been developed for "establishments" or "facilities" within the _____ Telephone and Telegraph Company's major subdivisions. The definition of an "establishment" or "facility" has been determined by agreement with the Office of Federal Contract Compliance and is as follows:

A geographical location with an identifiable labor market where substantial numbers of employees are located. This is generally a division or district headquarters community.

It is further agreed that designation of exact communities is determined by the Company with the approval of the regional O.F.C.C. officials. "Establishment" or "facility" affirmative action programs are available for company or governmental compliance officers.

D. WORK FORCE PROFILE

The Work Force Profiles Reports for December 31, 197_, indicate the _____ Telephone and Telegraph Company's latest work force profile by company (Exhibit #6A), by area(s) (Exhibit #6B), and by establishments (Exhibit 6C).

V GOALS, INTERMEDIATE TARGETS AND TIME FRAMES

A. PROLOGUE

The _____ Telephone and Telegraph Company recognizes that all goals^x, intermediate targets^Ø and time frames^{ØØ} explained in this section and detailed in the exhibits are neither rigid nor inflexible quotas, but objectives to be pursued by mobilization of available company resources for a "good faith effort."

Goals, intermediate targets and time frames are projected on a one, two and three year basis. The intermediate targets are reviewed annually and adjusted to reflect the three year target. At the end of the three year time frame, another three year projection will be made. The intermediate targets will be modified to assure that they provide maximum practical results toward our objective of achieving, within a reasonable period of time, an employee profile, with respect to sex and race in each major job classification, which is an approximate reflection of proper utilization.

Goals and intermediate targets have been established separately for minority groups and women.

x A goal is the percentage which would approximate the proper utilization of women and minorities in each Affirmative Action job classification in each establishment.

Ø An intermediate target is that portion of the goal which, based upon the anticipated opportunities for a time frame, an establishment can pursue.

ØØ A time frame is the calendar year or years which is used to designate points of reference for setting and measuring intermediate targets.

B. GOALS AND INTERMEDIATE TARGETS FOR MINORITY GROUPS

Goals and intermediate targets for minority groups have been established for the _____ Telephone and Telegraph Company for those job classifications in which minorities are underutilized. Each "establishment" program also contains goals and intermediate targets for those job classifications in which minorities are underutilized.

Our Company has conducted utilization and work force analyses for minorities. These analyses plus the anticipated expansion, contraction and turnover of and in the work force are used to determine our intermediate targets. Our corporate program contains goals, intermediate targets and time frames which are included as an exhibit in Section X.

C. GOALS AND INTERMEDIATE TARGETS FOR WOMEN

Goals and intermediate targets for women have been established for the _____ Telephone and Telegraph Company for those job classifications in which women are underutilized. Each "establishment" program contains goals and intermediate targets for those job classifications in which women are underutilized.

Our Company has conducted utilization and work force analyses for women. These analyses plus the anticipated expansion, contraction and turnover of and in the work force are used to determine our intermediate targets. Our corporate program contains goals, intermediate targets and time frames which are shown as an exhibit in Section X.

VI PLAN OF ACTION

A. PROLOGUE

The _____ Telephone and Telegraph Company views the affirmative action program as a results oriented program designed to enhance the opportunities of minority and women employees. Our Company recognizes that the ultimate success of this undertaking will be largely the result of the "good faith efforts" detailed in the plan of action section of this document. There is executive support for the plan; dissemination of the commitment to all employees enlisting their adherence to Company equal employment opportunity has been completed. In the following pages the substance of the plan to convert commitments to measurable progress is outlined.

B. RECRUITING

The _____ Telephone and Telegraph Company is actively seeking minorities and women for existing and future employment. In order to improve recruitment and increase the flow of minority and women applicants, our company will use minority and women recruiters to contact regularly local, state and federal employment referral agencies and women's agencies found within the local areas (e.g., Urban League, NAACP, The National Organization For Women and Sororities), secondary schools and colleges with high minority and female enrollments, concerned community leaders and specialized placement agencies (e.g., Aspira, LULAC and SER). Our resource directory lists the organizations we contact which provide this type of assistance. (Exhibit #7).

Our Company informs prime recruiting sources verbally and in writing at least annually of our EEO policy and maintains a file of sources notified and acknowledgements received. (Exhibit # 8A & B). Where possible, briefing sessions are conducted on company premises with representatives from these recruiting sources. These sessions include departmental tours, presentations by minority and women employees, definitive explanations of current and projected job openings, job briefs and qualifications, explanations of the company employment selection process and recruiting literature. Our Company makes formal arrangements with each of the organizations used for recruiting and referral of applicants.

Our Company employee recruiting program will actively encourage recruitment of women and minority candidates for existing and expected employment opportunities.

Minorities and women are included on the Personnel Relations Staff and as employment interviewers.

Company representatives who participate in job fairs do so with a planned program so that they can make tentative commitments on-the-spot pending further processing.

Active recruiting programs are carried out at secondary schools and colleges with predominant minority and female enrollments. Minorities and females are sought in these schools. Minority and women employees participate in career days, youth motivation programs and related community activities.

Special employment programs are undertaken whenever possible and include technical and non-technical co-op programs as well as work-study programs for faculty members. The above is directed to secondary schools and colleges with predominant minority and female enrollments. The programs include male and female counselors and emphasize minority and female placement.

Recruiting brochures that pictorially represent work situations include minorities and women. Employment advertising utilizes minority news media on an ongoing basis.

In all recruiting and hiring programs, college, non-management, sales, etc. our company complies with non-discrimination legislation relating to minorities and women. These programs are monitored semi-annually for adherence to that legislation. (Editor's Note)*

*Each individual company should insert their details of affirmative programs to recruit minorities and women.

C. TESTS

The _____ Telephone and Telegraph Company's employee selection process is based on the concept that tests are only one of the many criteria. Both in the selection of applicants and employees for filling job vacancies, our company does not rely upon the minimum scores required or preferred on tests as justification for failure to meet intermediate targets for any job classification. Our company does utilize test scores on validated tests along with other job related considerations in assessing individual qualifications. Our company hires people as regular employees who do not pass pre-employment tests and these individuals may participate in one or more of our company's special intake-programs. All persons involved in the employment process are cognizant of the fact that tests are only one predictor in selecting new employees.

It is the basic objective in the EEO program to have all tests and their uses conform with the OFCC Guidelines on Employee Testing and Other Selection Procedures and Company policy.

Test validation studies are made by the Personnel Research Section at The American Telephone and Telegraph Company in accordance with the OFCC Guidelines on Employee Testing and Other Selection Procedures. Copies of validation studies are on file with that Company.

The following are the tests currently being used:

(Company should list the tests they use)

D. EMPLOYMENT AND SELECTION

Our Company is planning to review all job briefs using job related criteria. Those procedures that are part of the employment or selection process that disproportionately affect minorities and/or women and cannot be shown to be job related will be modified. In addition, those position descriptions which are found to be inaccurate in relation to actual job functions and duties are to be revised.

The minority and sex makeup of applicants and hires is reviewed periodically to assure that sufficient numbers are applying for jobs.

All employees engaged in making hiring and selection decisions are carefully chosen and trained to assure non-discrimination in decision making. Individual employee results are reviewed periodically to insure non-discrimination is a fact.

Our Company employment application form contains the following notice in bold type: "Discrimination because of sex, race, color, religion, or national origin is prohibited. If you believe you have been discriminated against you may notify the Equal Employment Opportunity Commission, the Federal Communications Commission or other appropriate agencies." It is recognized that the Age Discrimination Act of 1967 is applicable to our employment process and it is so stated on the application blanks. The forms recite that The _____ Telephone and Telegraph Company is an Equal Employment Opportunity Employer.

Our Company's subunits notify the employment office of their intermediate targets for minorities and women. This enables the employment office to consider affirmative action objectives in making hiring decisions.

Our Company makes a special concentrated effort to employ minority group persons to meet our goals and intermediate targets.

E. PLACEMENT AND ADVANCEMENT

The Company has distributed to all non-management employees a brochure describing those non-management job titles having a substantial number of employees (Exhibit #9). This brochure also details job qualifications and procedures for filing transfer requests. Non-management employees can file transfer requests which are processed when job vacancies occur. If a transfer request is rejected, a written explanation for the rejection and a recommendation for qualifying in the future is sent to the employee's immediate supervisor. A copy of all rejection notices is retained for one year in the Transfer Bureau and is available to Company and governmental compliance reviewers.

The records of minority group and women employees are reviewed to assure that qualified individuals are given equal consideration as opportunities for upgrading, promotion and transfer occur. Where additional training and experience would be helpful for advancement, management counsels and assists minority and women employees.

All forms which are utilized in evaluating management employees have a category to measure affirmative action performance. This measurement has been added to evaluation forms so employee affirmative action efforts and results can be appraised along with other criteria necessary for an acceptable management job performance.

F. TRAINING

1. Training for Employment*

The Company recognizes that the vast majority of minority applicants hired are qualified under regular selection criteria. The _____ Telephone and Telegraph Company, however, is committed to action programs designed to upgrade the skills of underqualified persons. While such persons comprise a small percentage of the employee body, they are an important portion of the commitment to better the communities we serve.

Each of these action programs combines remedial education and vocational training in order to assist trainees in qualifying for company employment.

In addition to the education and training projects, special programs for pre-employment training and assessment have been developed.

Trainees selected to participate in special manpower training programs generally meet National Alliance of Businessmen's (NAB) selection criteria. Periodic auditing of trainee qualifications, as well as the qualifications of all other NAB hires, is conducted. Results of the periodic audits are available to Company and governmental compliance reviewers.

Descriptions of different company programs are included in major company subdivision or establishment affirmative action plans.

* If applicable to individual company.

2. Training for Advancement

Minorities and women are given equal access to all developmental training courses designed to enhance an employee's ability to assume positions of greater responsibility. Records of employee attendance at development training courses are maintained for two years by minority group and sex. This information is available to Company and governmental compliance reviewers and is periodically monitored to assure that all employees have equal access regardless of race and sex.

Also, the Company's Educational Tuition Aid Program is made available to all employees who wish to enhance their opportunity with the Company by supplementing their educations.

G. COMMUNITY ACTION

The results of the affirmative action program have depended to a large extent on our ability to let minority and women's communities know about The _____ Telephone and Telegraph Company's plan to enhance their employment opportunities. Positive relationships have resulted creating mutual respect and cooperation. This community action is discussed in Section VIII.

H. FACILITIES

All work areas, cafeterias, rest and recreational areas and other Company facilities are maintained on a racially desegregated basis.

All employees are encouraged to participate in in-hour and out-of-hour employee association and club activities.

I. SUBCONTRACTS

All Company contracts include an Equal Employment Opportunity clause where appropriate.

VII AUDITS AND REPORTS

A. PROLOGUE

In order for the _____ Telephone and Telegraph Company to secure attainment of the stated objective of achieving, within a reasonable period of time, an employee profile, with respect to race and sex in each major job classification, which is an approximate reflection of proper utilization, it would follow that a systematic approach has to be taken to monitor the results of our programs. This systematic approach enables us to evaluate results and to plan for the future.

B. EXTERNAL REPORTING

1. Reports and Agreement

The following are required and the frequency of filing is noted:

- a. EEO-1 Report - Annually
- b. FCC-395 Report - Annually
- c. Subcontractor Compliance Agreement - Annually

2. Special Federal Communications Commission (FCC) Requirements

- a. Reports - Copies of the Corporate Plan will be available for public inspection in the same manner and in the same locations (Exhibit 10) as required for the keeping and posting of tariffs as set forth in FCC Rules and Regulations, Section 61.72. Also available will be copies of all exhibits, letters and other documents filed as part thereto.
- b. Complaints - A record of complaints regarding alleged violations by the _____ Telephone and Telegraph Company of equal employment provisions of federal, state, or local law which have been filed before any body having competent jurisdiction will be filed according to FCC regulations. All correspondence between the _____ Telephone and Telegraph Company and the FCC pertaining to filed reports and all documents incorporated therein by reference will also be filed and maintained as required by regulations.

3. Special Equal Employment Opportunity Commission and Office of Federal Contract Compliance Reports

The _____ Telephone and Telegraph Company provides a summary of the Transfer Plan Activity Report to the Equal Employment Opportunity Commission and to the Office of Federal Contract Compliance on an annual basis. (In order to comply with our agreement with the EEOC and the OFCC, initially summaries of the Job Opportunities Report* and the Transfer Plan Activity Report will be forwarded within 45 days subsequent to the first and second full quarters following the date of the agreement.)

*Section VII, C

C. INTERNAL REPORTING SYSTEM

1. Internal Reports

The following reports are generated and monitored at least quarterly:

- a. Employment Office Activity Report includes
 - 1. Applicant and hire flow by EEO-1 minority designation and sex.
 - 2. Source of all referrals and hires by EEO-1 minority designation and sex.
 - 3. Reasons for rejection of employment applicants by EEO-1 minority designation and sex.
- b. Inward Movement Report includes
 - 1. Placements, upgrades and promotions by EEO-1 minority designation and sex.
- c. Outward Movement Report includes
 - 1. Resignations and dismissals by EEO-1 minority designation and sex.
- d. Profiles and Opportunities Report includes
 - 1. Progress of Company subunits toward goals and intermediate targets.
- e. Job Opportunities Report* includes
 - 1. Projected number of job opportunities by major job titles (e.g., installer, lineman) for the balance of the year.
- f. Transfer Plan Activity Report* includes
 - 1. The number of jobs filled during the previous quarter by net credited service date, date of transfer, job title, EEO-1 minority designation, sex and last previous job assignment.
- g. Training class attendance by EEO-1 minority designation and sex.

*The _____ Telephone and Telegraph Company will provide these reports on a quarterly basis, with respect to each of the Transfer Bureaus, to non-management employees served by such Transfer Bureau.

2. Internal Compliance Reviews

The Company's EEO Coordinators conduct compliance reviews, at least semi-annually, of all major Company Subdivisions, "Establishments" or "facilities." These reviews enable the coordinators to identify local problems, summarize unit progress and performance and make recommendations to the Corporate Assistant Vice President-Personnel Relations. Company compliance reviewers monitor at least the following:

- a. Composition of applicant and hire flow by minority group and sex.
- b. Selection process for hiring, placement, transferring and upgrading.
- c. Attendance at developmental training courses by minority and women employees.
- d. Proper display of posters and EEO policy.
- e. Attitude of the work force.
- f. Inclusion of EEO clause in purchase orders.
- g. Notification of recruiting sources of EEO policy.
- h. Dissemination of policy.
- i. Progress of subunit toward goals and intermediate targets.
- j. Resignations and dismissals by minority group and sex.

VIII COMMUNITY ACTION PROGRAMS

A. CORPORATE CITIZENSHIP

The _____ Telephone and Telegraph Company recognizes its role as a corporate citizen in the community and is continuing its leadership through programs designed to strengthen the socio-economic status of minority group and female citizens. By participating in these programs, company management intends to serve as a catalyst in stimulating other leaders in commerce and industry to join forces in cooperative efforts to cope with urban problems.

The Company will continue its cooperation with local Boards of Education in developing programs for urban school students.

Programs and courses designed to raise the skill level of minorities and women will continue to be developed and conducted.

Other community relations efforts are:

- Scheduled tours through Company facilities. Those included are representatives from schools, students, minority and women's employment sources, civic groups and others of the community.
- "Speakers' Bureau" to speak before school groups discouraging school "drop-outs", expressing our function as a company and our need for employees.
- Company Educational Aid Consultants contact school teachers and administrators regarding the availability of Bell System free curriculum assistance materials.
- Minority Recruiters counsel, act as primary contacts with various agencies and are members of advisory boards of various minority community help groups.
- Executives and managers designated by the _____ Telephone and Telegraph Company act as advisers, members of boards of directors, fund raisers and in various other capacities to urban, minority and female oriented organizations. In certain approved cases, cash contributions are made to minority and female causes.

- Involvement in job clinics, Urban Leagues, Urban Coalition organizations and, in general, keeping personal contact with the many minority and female organizations of the communities in which we operate.
- Loan of Company Executives to the National Alliance of Businessmen.
- Participation in and where practical sponsorship of seminars for the business community on equal employment opportunity for minorities and women.
- Active encouragement of community and consortium child care centers designed to improve the employment opportunities for women and men of all races.
- Continued use of local and minority news media as a tool for publicizing the achievements of minority and female employees and the Company Equal Employment Opportunity Policy.
- Voluntary expenditure by employees of their personal time to aid in the solution of urban and community programs.

The _____ Telephone and Telegraph Company Affirmative Action Program will be dynamic and viable. Frequent personnel contacts with minority and women's leaders and other key individuals will be made to insure that the program is kept effective in meeting the current needs of each community in which we have operating personnel.

IX STATEMENT OF COMMITMENT

IX STATEMENT OF COMMITMENT

It is hereby reaffirmed that it is the policy of the _____ Telephone and Telegraph Company to provide equal employment opportunity in all aspects of the employer-employee relationship - including recruiting, hiring, upgrading and promotion, conditions and privileges of employment, Company-sponsored training, education assistance, social and recreational programs, compensation, benefits, transfers, discipline, layoffs, recalls and termination of employment - to all employees without discrimination because of race, color, religion, national origin, sex or age.

Equal employment opportunity, as defined in law and governmental regulations, requires affirmative steps to insure the full utilization of minorities and women in our work force. It is the intention of the Company to adhere to both the letter and spirit of these laws and regulations. The accompanying Affirmative Action Plan for 197_ sets forth our present interpretation of the course of action the Company must take in order to fulfill its intention to fully meet its lawful obligations.

We affirm that all available Company resources are being mobilized for a good faith effort to attain the goals indicated. We further pledge our support for the objectives of affirmative action and a work environment without discrimination.

This Company Affirmative Action Plan will be updated and revised annually in the light of experience, revised laws and regulations or their evolving interpretation, and better understanding of effective approaches which will assure truly equal employment opportunity for all. Any questions relating to details of this plan should be referred to the Assistant Vice President - Personnel who has been designated as the Company's Equal Employment Opportunity Official.

President

Vice President- Personnel

Assistant Vice President-Personnel

The American Telephone and Telegraph Company
195 Broadway
New York, New York 10007

X EXHIBITS

MINORITY PROGRESS REPORT

Management	PREVIOUS THREE YEARS							
	12/31/65	% of Total	12/31/	% of Total	12/31/	% of Total	12/31/	% of Total
White								
Minorities								
Black								
Spanish-Surnamed								
Other Non-White								
Total Minorities								
Total Management								
Non-Management								
White								
Minorities								
Black								
Spanish-Surnamed								
Other Non White								
Total Minorities								
Total Non Management								
Total Company								
White								
Minorities								
Black								
Spanish-Surnamed								
Other Non-White								
Total Minorities								
Total Employees								

WOMEN PROGRESS REPORT

Management	12/31/65	% of Total	PREVIOUS THREE YEARS			
			12/31/	% of Total	12/31/	% of Total
Men						
Women						
Total Management						
Non-Management						
Men						
Women						
Total Non-Management						
Total Company						
Men						
Women						
Total Employees						

TO CONTRACTORS, SUBCONTRACTORS, VENDORS AND SUPPLIERS:

Pursuant to Executive Order 11246 as amended and Executive Order 11375 and regulations issued there under which became effective December 4, 1971, it is agreed that the clause relating to Equal Opportunity referred to in subpart 60-2.21b(2) is incorporated by reference in each contract and each order to you which is within the scope of the regulations.

If these arrangements are acceptable to you, please note your concurrence on the attached copy of this letter and return it for our files.

Very truly yours,

Accepted:

Date:

Attachment

John W. Kingsbury
Assistant Vice President



American Telephone &
Telegraph Company
195 Broadway
New York, N. Y. 10007
Phone (212) 393-3241

November 9, 1971 (Revised)

TO ALL PERSONNEL VICE PRESIDENTS:

I am attaching a copy of an amendment to the Federal Procurement Regulations under Title 41 - Public Contracts and Property Management. This amendment establishes a new subpart 1-1.13, Minority Business Enterprises, and prescribes subcontracting policies, procedures and contract clauses designed to foster and encourage the participation of minority business enterprises in the subcontracts awarded by Government prime contractors.

In general, it is the policy of the Government that maximum practicable opportunity to participate in the performance of Government Contracts be provided to minority business enterprises as subcontractors and suppliers to contractors performing work or rendering services as prime contractors or subcontractors under Government procurement contracts.

The amended regulation, which became effective on October 18, 1971, requires that the following clause be included in all contracts in amounts which may exceed \$5,000 except contracts which, including all subcontracts thereunder, are to be performed entirely outside the United States, its possessions, and Puerto Rico and contracts for services which are personal in nature:

Utilization of Minority Business Enterprises

(a) It is the policy of the Government that minority business enterprises shall have the maximum practicable opportunity to participate in the performance of Government contracts.

(b) The Contractor agrees to use his best efforts to carry out this policy in the award of his subcontracts to the fullest extent consistent with the efficient performance of this contract. As used in this contract, the term "minority business enterprise" means a business, at least 50 percent of which is owned by minority group members or, in case of publicly owned businesses, at least 51 percent of the stock of which is owned by minority group members. For the purposes of this definition, minority group members are Negroes, Spanish-speaking American persons, American-Orientals, American-Indians, American-Eskimos, and American Aleuts. Contractors may rely on written representations by subcontractors regarding their status as minority business enterprises in lieu of an independent investigation.

Contracts which may exceed \$500,000 which contain the above clause and which, in the opinion of the procuring activity, offer substantial subcontracting possibilities are required to include the Minority Business Enterprises Subcontracting Program clause set forth in Title 41, § 1-1.1310-2(b).

In addition, prime contractors who are to be awarded contracts which may not exceed \$500,000, but which, in the opinion of the procuring activity, offer substantial subcontracting possibilities will be urged to accept the Minority Business Enterprises Subcontracting Program clause set forth in Title 41, § 1-1.1310-2(b).

Our compliance with Title 41 - Public Contracts and Property Management, subpart 1-1.13, would be viewed by GSA as part of our "good faith effort" in meeting federal equal opportunity requirements. Accordingly AT&T is exchanging letters (Exhibit A) with both Western Electric and Bell Telephone Laboratories to accomplish this. Similarly it will incorporate the clause relating to the utilization of minority business enterprises by reference in other contracts as required (Exhibit B).

Sincerely,



Attachments

(Exhibit A)

Mr. Harvey G. Mehlhouse, President
Western Electric Company, Incorporated
195 Broadway
New York, New York 10007

Dear Mr. Mehlhouse:

Pursuant to Executive Order 11458 and regulations issued thereunder (41 CFR 1-1.13 - Minority Business Enterprises) which became effective October 18, 1971, the clauses relating to utilization of minority business enterprises referred to in subpart 1-1.1310-2 of the regulations are incorporated by reference in all orders placed by us on you and all arrangements by you for communication service provided by us. Further, AT&T and Western Electric each certifies to the other that it will incorporate the clause by reference or other wise in its subcontracts covered by the regulations.

If these arrangements are acceptable, please note your Company's concurrence on the attached copy of this letter and return it for our files.

Very truly yours,

Chairman

accepted: _____
(note: Similar letter to BTL)

(Exhibit B)

To a Contractor:

Pursuant to Executive Order 11458 and regulations issued thereunder (41 CFR 1-1.13 - Minority Business Enterprises) which became effective October 18, 1971, it is agreed that the clause relating to the utilization of minority business enterprises referred to in subpart 1-1.1310-2 is incorporated by reference in each contract and each order to you which is within the scope of the regulations.

If these arrangements are acceptable to you, please note your concurrence on the attached copy of this letter and return it for our files.

Very truly yours,

accepted: (Subcontractor)

Negro Men's Fraternities

National Council of Negro Women

YWCA

Jewish Women's Group

Catholic Women's Groups

Women's Colleges

High School Work-Study Programs

Industrial Cooperative Training

Distributive Education

Cooperative Office Education

Action, Inc.

Vocational and Technical Schools

Specialized Employment Agencies

Work Incentive Program

CAMP

Volunteer Advisory Corps

Concerned Private Citizens

State Equal Employment Opportunity Commission

Dept. of Labor Women's Bureau

National Alliance of Businessmen

Police Athletic League Clubs

Community Centers

Bureau of Indian Affairs

Minority Employee Organization

Indian Reservations

Oriental Organizations

Organizations Dealing With Spanish Surnamed Americans

Suggested Letter to Each
Public and Private Agency
Involved in Employee Recruiting

Certified Mail
Return Receipt Requested

Dear Mr./Mrs./Miss _____;

Our company has long had an on-going commitment, through our affirmative action program, to hire and develop the best people we can find - basing our judgment on their job-related qualifications - because its morally right and legally required.

We will continue to direct our recruiting and hiring policies to be free of discriminatory practices. We are soliciting your assistance and cooperation in actively recruiting and referring applicants for all jobs without regard to race, religion, color, sex, age or national origin.

We should like to confirm at this time, the concurrence of your agency (office) (department) with this non-discriminatory policy. A duplicate copy of this letter is enclosed for your convenience in expressing such concurrence,

Very truly yours,

Approved:

Date : _____
By : _____ Name _____
Title: _____

This procedure should coincide with the Transfer Plus non-management job titles, job qualifications and transfer request procedures.

Suggested Letter to Schools

Dear School Administrator:

Our company has long had an on-going commitment, through our affirmative action program, to hire, develop and train the best people we can find - basing our judgment on their job-related qualifications - because its morally right and legally required.

We offer programs designed to motivate students to stay in school, to continue their education (tuition aid), and aid in the developing and enriching of curricula by school systems to meet the employment needs of industry in general. We offer other programs directed to grooming, attitudes, how to apply for a job, employment tests, and how employment interviews are conducted. In addition we offer tours of company facilities, are available to participate in educator seminars, job fairs, career days and summer workshops.

Our school relations groups are working with your personnel on a continuing basis. If there are any areas in which we can be of further assistance we would appreciate your contacting us.

Sincerely,

This brochure should coincide with the Transfer Plan non-management job titles, job qualifications and transfer request procedures.

A listing of the Company locations at which tariffs are kept and posted should be inserted here so that the reviewing agencies will be aware that the Affirmative Action Program is being maintained per FCC rules and regulations.

XI ADDENDUM - GUIDELINES AND PROCEDURES FOR
ESTABLISHING INTERMEDIATE TARGETS AND TIME FRAMES

I. Overview

Our objective is to achieve within a reasonable period of time an employee profile with respect to race and sex in each major job classification which is an approximate reflection of proper utilization.

In order to attain our objective, goals and intermediate targets are established on the basis of projected job opportunities (defined in Paragraph II) for those job classifications in which there is an under-utilization.

The basic orientation of the procedures in this addendum is to determine intermediate targets, expressed in terms of a percentage composition, for the groups of employees selected to fill job opportunities in each job classification in a given time frame. These percentages are then applied to the projected number of opportunities to determine an intermediate target in terms of the actual numbers to be allocated. However, because all projections are expressed in terms of percentages, if the number of opportunities turns out to be greater or less than the projection, the actual numbers are automatically modified accordingly.

II. Definitions

- A. Position - a position is a job that has been approved by management to be filled by an individual. I. e. , a given Traffic Central Office has approval for 56 Operators and associated personnel. That Traffic Office has 56 positions. If that office had only 54 employees on the payroll at a given point in time then that office would at that point in time have two OPEN POSITIONS.
- B. Vacancy - a vacancy is an OPEN POSITION. A vacancy occurs anytime a position becomes open.
- C. Job Opportunity - a vacancy:

1. created by
 - a. the transfer, promotion or loss of an employee or
 - b. the approval of management for the addition of a position (growth) in a particular AAP job classification, and

2. filled by
 - a. promoting an employee from a lower AAP job classification or
 - b. by a direct hire.

No job opportunity is considered to have occurred in the following circumstances:

1. Lateral transfer from another establishment, area or company.
2. Promotion from a lower job within the same AAP job classification.
3. Demotion from a higher job.
4. Recall from layoff to a job within the same or lower AAP job classification.
5. Return from regular leave of absence (in excess of 30 days) to a job in the same or lower AAP job classification.

Job Opportunity involves an annual net effect concept. For example, if a position becomes open more than once in a given year and is filled each time by a direct hire or promotion, at the end of the year only one "job opportunity" is considered to have occurred. Thus, while a vacancy occurred each time such position became open, only one job opportunity occurred.

The Net Effect concept of a job opportunity must be considered in projecting outward movement (transfer, promotion or losses through termination, resignation, etc.) in connection with the entire procedure of setting intermediate targets. In effect the projection required is not total outward movement, but rather the net outward movement of individuals from those positions that existed in a given job classification at the beginning of the year.

D. Relevant Labor Pool

General

A relevant labor pool is the work force that a given company normally draws from either externally or internally or in combination in filling vacancies. The following are exemplifications:

Entry Level Jobs

Job Classifications 15, 14 and 13 - Service Worker, Operator, and Office/Clerical Entry.

The relevant labor pool for these entry level job classifications is external.

Above Entry Level Jobs

In keeping with the traditional Bell System policies of promotion from within, the relevant labor pools for "Above Entry Level" jobs are generally internal. These internal sources include employees in relevant employee pools (15 Affirmative Action Classifications) as described below.

The following examples are illustrative only, since each Bell company may establish its own relevant labor pools.

Job Classification 12 - Office/Clerical - Semi-Skilled

This job classification has a relevant labor pool normally consisting primarily of job classifications 13, 14, and 15 in addition to components in the external work force. Approximately ___% of job classification 12 is drawn from the external work force.

Job Classification 11 - Office/Clerical - Skilled

This job classification has a relevant labor pool normally consisting primarily of job classification 12, in addition to components of the external work force. Approximately ___% of job classification 11 is drawn from the external work force.

Job Classification 10 - Telephone Craft - Inside -
Semi-Skilled

This job classification has a relevant labor pool normally consisting primarily of job classifications 11, 12, 13, 14, 15 in addition to components of the external work force. Approximately ___% of job classification 10 is drawn from the external work force.

Job Classification 9 - Telephone Craft - Outside -
Semi-Skilled

This job classification has a relevant labor pool normally consisting primarily of job classifications 15, 14, 11, 10, 8 in addition to components of the external work force. Approximately ___% of job classification 9 is drawn from the external work force.

Job Classification 8 - General Services - Skilled

This job classification has a relevant labor pool normally consisting primarily of job classification 15 in addition to components of the external work force. Approximately ___% of job classification 8 is drawn from the external work force.

Job Classification 7 - Telephone Craft - Inside - Skilled

This job classification has a relevant labor pool normally consisting primarily of job classifications 10, 9, 8 in addition to components of the external work force. Approximately ___% of job classification 7 is drawn from the external work force.

Job Classification 6 - Telephone Craft - Outside - Skilled

This job classification has a relevant labor pool normally consisting of job classifications 9 and 8 in addition to components of the external work force. Approximately ___% of job classification 6 is drawn from the external work force.

Job Classification 5 - Sales Workers

This job classification has a relevant labor pool normally consisting primarily of job classifications 11, 10, 9, 8 in addition to components of the external work force. Approximately ___% of job classification 5 is drawn from the external work force.

Job Classification 4 - Administrative Positions

This job classification has two sub-classifications each of which has its own relevant labor pool.

Sub-Job Classification 4A - Administrative Positions - Management

This sub-job classification has a relevant labor pool normally consisting primarily of sub-job classification 4B in addition to components of the external work force. Approximately ___% of sub-job classification 4A is drawn from the external work force.

Sub-Job Classification 4B - Administrative Positions - Non-Management

This sub-job classification has a relevant labor pool normally consisting primarily of job classifications 12, 11 in addition to components of the external work force. Approximately ___% of sub-job classification 4B is drawn from the external work force.

Job Classification 3 - 1st Level Management

This job classification has a relevant labor pool normally consisting primarily of job classifications 11, 8, 7, 6, 5, 4A in addition to components of the external work force. Approximately ___% of job classification 3 is drawn from the external work force.

Job Classification 2 - 2nd Level Management

This job classification has a relevant labor pool normally consisting primarily of job classification 3 in addition to components of the external work force. Approximately ___% of job classification 2 is drawn from the external work force.

Job Classification 1 - 3rd Level Management and Above

The 3rd level management portion of this job classification has a relevant labor pool normally consisting primarily of job classification 2 in addition to components of the external work force. Each consecutive classification (e.g., 4th level) has a relevant labor pool normally consisting primarily of the next lower level classification and components of the external work force. Approximately ___% of job classification 1 is drawn from the external work force.

NOTE: It should be emphasized that these relevant labor pools are not intended to limit actual upgrading of employees to the career paths indicated. They reflect an exemplification of normal movement of employees for use in establishing intermediate targets.

Each individual company should prepare its own list of relevant labor pools for each job classification and express the percent that is anticipated to be drawn externally. The relevant labor pools assigned to each job classification should be included as an exhibit to both the Corporate and individual Establishment Affirmative Action Programs,

III. Basis for Setting Intermediate Targets

A. Above Entry Level Job Classifications (Example)

Following are three simplified examples of basic steps in setting an intermediate target for black males in Job Classification 7: Craft - Skilled - Inside:

Example 1

1. Carry out the utilization analysis for minorities by job classification as outlined in Section IV.
2. Determine the percentage of black males in Job Classification 7.
3. Determine the percentage of black males in the relevant employee pools for Job Classification 7 (see Paragraph II D of this section).
4. Convert the percentage of black males in Job Classification 7 and the percentage of black males in the relevant employee pool to a ratio (expressed as a percent)

$$\frac{\% \text{ Job Classification 7}}{\% \text{ Relevant Employee Pool}} = \%$$
5. If the ratio is 80% or more, then use the percentage of black males in the relevant employee pool in Step 6.
6. Compare the percentage derived in Step 5 with one and one-half times the percentage for black males, derived from the utilization analysis (Step 1), and use the smaller as the black male job opportunity percentage.

Job Classification: Craft - Skilled - Inside		Male			
		Grand Total	Total	White	Black
1.	Profile at beginning of year	291	283	266	17
2.	% composition of profile at beginning of year	100%	97.2%	91.4%	5.8%
3.	% composition of relevant employee pool	100%	48%	41%	7%
4.	Ratio of line 2 to line 3	/	/	/	83%
5.	Line 3 Adjusted for A. A. Override (if applicable)	/	/	/	7%
6.	Utilization analysis of Job Classification				10%
7.	1.5 x line 6				15%
8.	% of Job Opportunities				7%
9.	Job Opportunities	23			2
10.	Intermediate Target Year-End Profile	291			18
11.	Intermediate Target % Profile at Year-End	100%			6.2%

- A. Black males represent 5.8% of the employees in the classification.
- B. Black males represent 7% of the employees in the relevant employee pool.
- C. Ratio of line 2 to line 3 ($5.8\% + 7\%$) = 83%
- D. 83% is greater than 80% therefore the percent representation in the relevant employee pool is used.
- E. The percentage of black males derived from the utilization analysis for this classification is 10%.
- F. One and one-half times the representation in the utilization analysis ($10\% \times 1.5\%$) = 15%.
- G. Compare line 7 (15%) to line 5 (7%) and use the smaller.
- H. Black males get 7% of the job opportunities.
- I. In this example, job opportunities equal 23. That is based on a lost rate of 8% and no growth ($8\% \times 291 = 23$).
- J. The Intermediate Target - Year End Profile would be the number at the beginning of the year (17), less losses ($8\% \times 17 = 1$ loss), plus job opportunities ($7\% \times 23 = 2$ opportunities) = 18.
- K. Intermediate Target - Percent Profile at Year End for black males would be 6.2%.

Example 2

1. Carry out the utilization analysis for minorities by job classification as outlined in Section IV.
2. Determine the percentage of black males in Job Classification 7.
3. Determine the percentage of black males in the relevant employee pool for Job Classification 7 (see Paragraph II D of this section).
4. Convert the percentage of black males in Job Classification 7 and the percentage of black males in the relevant employee pool to a ratio (expressed as a percent):
$$\frac{\% \text{ Job Class. 7}}{\% \text{ Rel. Emp. Pool}} = \%$$
5. If the ratio is 50% or less, then apply an Affirmative Action Override of two times the percentage that black males are of the relevant employee pool and use that percentage in Step 6.
6. Compare the percentage derived in Step 5 with one and one-half times the percentage for black males derived from the utilization analysis (Step 1), and use the smaller as the black male job opportunity percentage.

Job Classification: Craft - Skilled - Inside		Male			
		Grand Total	Total	White	Black
1.	Profile at beginning of year	291	283	278	5
2.	% composition of profile at beginning of year	100%	97.2%	95.5%	1.7%
3.	% composition of relevant employee pool	100%	48%	41%	7%
4.	Ratio of line 2 to line 3				24%
5.	Line 3 Adjusted for A. A. Override				14%
6.	Utilization analysis of Job Classification				10%
7.	1.5 x line 6				15%
8.	% of Job Opportunities				14%
9.	Job Opportunities	23			3
10.	Intermediate Target Year - End Profile	291			8

- A. Black males represent 1.7% of the employees in the classification.
- B. Black males represent 7% of the employees in the relevant employee pool.
- C. Ratio of line 2 to line 3 ($1.7\% \div 7\%$) = 24%
- D. 24% is less than 50%, therefore, the percent representation in the relevant employee pool is doubled ($2\% \times 7\%$) = 14%
- E. The percentage of black males derived from the utilization analysis for this classification is 10%
- F. One and one-half times the representation in the utilization analysis ($10\% \times 1.5$) = 15%
- G. Compare line 7 (15%) to line 5 (14%) and use the smaller
- H. Black males get 14% of the job opportunities
- I. In this example, job opportunities equal 23. This is based on a loss rate of 8% and no growth ($8\% \times 291 = 23$)
- J. The Intermediate Target - Year End Profile would be the number at the beginning of the year (5), less losses ($8\% \times 5 = 0$), plus job opportunities ($14\% \times 23 = 3$ opportunities) = 8
- K. Intermediate Target - Percent Profile at Year End for black males would be 2.7%

Example 3

1. Carry out the utilization analysis for minorities by job classification as outlined in Section IV.
2. Determine the percentage of black males in Job Classification 7.
3. Determine the percentage of black males in the relevant employee pool for Job Classification 7 (see Paragraph II D of this section).
4. Convert the percentage of black males in Job Classification 7 and the percentage of black males in the relevant employee pool to a ratio (expressed as a percent):
$$\frac{\% \text{ Job Class. 7}}{\% \text{ Rel. Emp. Pool}} = \%$$
5. If the ratio is from 51% to 79%, then apply an Affirmative Action Override of one and one-half times the percentage that black males are of the relevant employee pool and use that percentage in Step 6.
6. Compare the percentage derived in Step 5 with one and one-half times the percentage for black males derived from the utilization analysis (Step 1), and use the smaller as the black male job opportunity percentage.

Job Classification: Craft - Skilled - Inside		Male			
		Grand Total	Total	White	Black
1.	Profile at Beginning of year	291	283	271	12
2.	% Composition of profile at beginning of year	100%	97.2%	93.1%	4.1%
3.	% composition of relevant employee pool	100%	48%	41%	7%
4.	Ratio of line 2 to line 3	/ / / / /	/ / / / /	/ / / / /	59%
5.	Line 3 adjusted for A. A. override	/ / / / /	/ / / / /	/ / / / /	10.5%
6.	Utilization analysis of Job Classification				10%
7.	1.5 x line 6				15%
8.	% of Job Opportunities				10.5%
9.	Job Opportunities	23			2
10.	Intermediate Target Year-End Profile	291			13
11.	Intermediate Target % Profile at Year End	100%			4.5%

- A. Black males represent 4.1% of the employees in the classification.
- B. Black males represent 7% of the employees in the relevant employee pool.
- C. Ratio of line 2 to line 1 ($4.1\% \div 7\%$) = 59%
- D. 59% is between 51% and 79%, therefore, the percent representation in the relevant employee pool is multiplied by one and one-half ($1.5 \times 7\%$) = 10.5%
- E. The percentage of black males derived from the utilization analysis for this classification is 10%.
- F. One and one-half times the representation in the utilization analysis ($10\% \times 1.5$) = 15%
- G. Compare line 7 (15%) to line 5 (10.5%) and use the smaller
- H. Black males get 10.5% of the job classification
- I. In this example, job opportunities equal 23. That is based on a loss rate of 8% and no growth ($8\% \times 291 = 23$)
- J. The Intermediate Target - Year End Profile would be the number at the beginning of the year (12), less losses ($8\% \times 12 = 1$), plus job opportunities ($10.5\% \times 23 = 2$ opportunities) = 13
- K. Intermediate Target - Percent Profile at Year End for black males would be 4.5%

B. Entry Level Job Classifications

The basic steps for setting intermediate targets for entry level job classifications would proceed as follows:

1. Carry out the utilization analysis for minorities and women by job classification as outlined in Section IV.
2. Determine the percentages by race and sex of all employees in the entry level job classifications.
3. Compare the employee profile in entry level job classifications to percentages for each such classification derived from the utilization analysis.
4. Whenever the percentage in the job classification is less than the percentage derived from the utilization analysis, use one and one-half times the utilization percentage in determining the job opportunity percentage for the specific group involved.

In no case will the job opportunity percentage for total minorities or for total women be set to exceed 50% of the direct hires.

IV. Monitoring Progress

Progress toward the company's and establishment's intermediate targets will be measured and evaluated by: (A) comparing the race and sex composition in each of the job classifications at the end of each year with such composition at the end of the preceding year; and (B) comparing the percent of job opportunities actually filled by each race and sex group in each job classification during the year with the percent of job opportunities which had been forecasted for each race and sex group in each job classification for that year.