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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Implementation of Section 22 )  
of the Cable Television Consumer )  
Protection and Competition )  
Act of 1992 )  
 )  
Equal Employment Opportunities )

MM Docket No. 92-261

**REPLY COMMENTS OF  
TELE-COMMUNICATIONS, INC.**

Tele-Communications, Inc. ("TCI") by its attorneys,  
hereby submits these reply comments concerning the revision of  
the EEO rules in the above-referenced proceeding.

**I. REDUNDANT COMMISSION REPORTING  
REQUIREMENTS SHOULD BE ELIMINATED**

The common concern expressed by the majority of com-  
menters focused on the significant increase in record keeping and  
reporting which will be required by operators in order to comply  
with the new EEO provisions of the 1992 Act. In its Comments,  
TCI noted that the revised Form 395-A will increase the volume of  
employment data for each employment unit by at least 100%. Job  
title reporting alone will encompass some 20,000 employees in  
over 250 different job titles. To alleviate some of this burden  
and eliminate duplicative requirements, TCI urges the Commission  
to modify its Supplemental Investigation Sheet ("SIS") to no

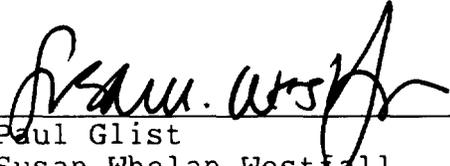
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longer require statistical breakdowns of persons employed in specified job categories,<sup>1/</sup> which would eliminate approximately 50% of the SIS reporting requirements. This represents measurable relief for TCI which annually files SIS forms for 20% of its 400 employment units. Now that the Commission is required to annually collect employee breakdowns for all positions within each job category contained on the Form 395-A, collection of this information on the separate SIS is redundant. Accordingly, this requirement should be deleted from the SIS.

Respectfully submitted,  
TELE-COMMUNICATIONS, INC.

By

  
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<sup>1/</sup> See FCC Form 395-A - Supplemental Investigation Sheet, Part I.