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May 16, 1994

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Office of the Secretary
Federal Communications Commission
1919 M. Street, N.W.
Washington, D. C. 20554

These comments are in response to the FCC Notice of Inquiry 94-103, MM Docket No. 94-34, adopted April 20, 1994 and released April 21, 1994 seeking comments on the effectiveness of the Commission's rules, procedures, policies, standards and guidelines in promoting equality of employment opportunity in the cable and broadcast industries, etc.

I appreciate the opportunity to comment on this NOI. As an employee of a major RBOC, fully expecting some form of the pending legislation to pass soon which will allow RBOCs and cable companies cross-ownership privileges, I am strongly in favor of expanding EEO policies to entities other than broadcasters, cable operations, and MVPDs. (See item 39 of the NOI). As this item appropriately notes, the technology conversion will enable common carriers to provide services that compete with broadcast and cable services. While *I am anxious for my company to have the freedom to compete in a level playing field* within the telecommunications industry, I am also concerned that all employees may not enjoy the expanded opportunities such freedom will bring.

If the FCC conducted a study of the people of color at every level of management and craft positions in the RBOCs, cable TV companies, broadcast companies, independent telephone companies, and interexchange carriers - large and small - (and I hope the FCC or some other government entity does such a study), it would find a tremendous imbalance from the top levels of management to the lowest level of management. People of color are heavily concentrated at the lowest management levels. In craft positions people of color are not well represented in the highest paying positions. Also the positions offering the most career growth, exposure, and development are not occupied by many people of color, especially African Americans.

The current reporting required from my company does not reflect employment or promotions by level or job classification. Hence, totals reported just do not tell the whole story.

The FCC should require of all common carriers and smaller companies what is required on the Form 395-A, referenced in item 8 of the NOI, of cable companies today - a full report on where each company stands at each level and job classification. Then, the FCC must closely scrutinize the reports in a timely manner and act accordingly. To do less would allow the current imbalances to continue.

Signed,

Sandra L. Brode
10030 Cayuga
Dallas, TX 75228

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Dwight W. Chachere

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