



Comcast Cable
3055 Comcast Place
Livermore, CA 94551

March 1, 2010

Paul Clanon
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

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EXECUTIVE DIRECTOR'S OFFICE

**Re: Comcast Phone of California, LLC (U 5698 C)
General Order 156 Compliance Filing**

Dear Mr. Clanon:

Comcast Phone of California, LLC (U 5698 C) ("Comcast Phone") hereby submits its General Order 156 compliance filing. As discussed in more detail below, Comcast Phone does not have any G.O. 156 reportable procurement activities because its indirect parent, Comcast Cable Communications, LLC ("Comcast") administers Comcast Phone's purchases. Comcast is not a public utility and is not subject to G.O. 156, but is voluntarily submitting information about its supplier diversity program. Comcast's filing is in narrative format, rather than the typical G.O. 156 report template used by public utilities. Information provided, however, is generally based on G.O. 156 regulations and is informative for Commission purposes.

Comcast Phone is a facilities-based telecommunications service provider that currently provides wholesale interconnection service in California. As a result, the only third-party contracts for which Comcast Phone is directly responsible are its Section 251 interconnection agreements with California incumbent local exchange carriers, and commercial agreements with competitive providers for traffic exchange or transport. For these reasons, Comcast Phone has no procurement activities that would be reportable under G.O. 156.¹

Comcast's Diversity Strategy

Diversity is one of the Comcast Touchstones. The Comcast Touchstones are the values that define us a company and help us achieve consistent financial successful results and lay the foundation for our future success.

Our diversity commitment is organized into three focused areas: Community, Workforce and Suppliers.

¹ Comcast Phone does not contest the Commission regulatory authority over it and its various telecommunications services offerings.

Community: No matter how big we grow, Comcast will always be committed to being an integral part of the communities in which we live and work. Our success mirrors that involvement, which has allowed us to create new opportunities within neighborhoods already rich in culture, experience, and perspectives. We are honored to reflect the diversity we find in these communities. We want to make a difference - every day - in sustaining the vitality of our neighborhoods.

Workforce: Our Company can only be as strong as our workforce. Finding and attracting the best people from a wide range of backgrounds takes time, effort and a real commitment to the diverse communities we serve. That is why Comcast participates in more than 100 diversity-recruiting events across the country each year and why the Comcast Recruiting Team has built a number of valuable partnerships with diverse professional and community-based organizations. We are dedicated to each employee's professional success. In fact, Comcast makes significant investments in various training courses on various levels and in career development and leadership programs that continuously help our employees develop to achieve all of their goals. In addition, we are committed to partnering with other organizations dedicated to growing tomorrow's leaders.

Suppliers: Comcast's Supplier Diversity Program is designed to promote, increase, and improve the quality of the participation of small and diversity-owned businesses in our supply chain. We are constantly expanding 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.

Comcast's California Supplier Diversity Progress

Comcast recognizes that our commitment and our dollars are important in supporting diverse suppliers, diversity overall and the California economy.

Comcast's annual supplier diversity goals are based on purchases from Women-Minority Business Enterprises ("WMBE"), Small Disadvantaged Businesses and Veteran vendors, either certified with the National Minority Supplier Development Council ("NMSDC"), Women's Business Enterprise Nat'l Council ("WBENC") or that self-certify through our registration process. In 2009, Comcast's total California Supplier Diversity Program spent \$48,574,759 with diverse suppliers, which resulted in a 15.4% diversity spend.

Internal Activities Aimed At Increasing Use of Diverse Suppliers

Comcast has implemented several internal initiatives to increase the use of Diverse Suppliers and increase the visibility of opportunities to do business with the company, including:

- ❖ Job Aide that helps purchasers identifies new diverse suppliers. The Job Aide is comprised of potential suppliers who have registered with Comcast's supplier diversity program;
- ❖ A Supplier Diversity intranet site that helps purchasers more easily identify diverse suppliers;
- ❖ Supplier Diversity Scorecard Report introduced to provide relevant, actionable information. Top diverse suppliers are featured on the report to provide maximum visibility across the company;
- ❖ Modification to Comcast's Supplier Diversity website to allow for a web-enabled diverse supplier registration process to capture more information and broader categories of diversity.

External Activities Aimed At Increasing Use of Diverse Suppliers

In 2009, Comcast representatives have participated in the following supplier diversity recruiting activities and organizations, where they speak with dozens of potential suppliers:

- ❖ California Black Chamber of Commerce Business Economic Summit
- ❖ e National Federation of Filipino Americans Supplier Diversity Outreach event
- ❖ California Public Utilities Commission's Small Business Expo in Yuba City

Supplier Diversity Tools

Comcast's Supplier Diversity website (www.comcast.com/corporate/about/diversity/suppliers/suppliers.html) informs perspective suppliers about the products and services Comcast purchases, and allows these suppliers to complete their Professional Services and Vendor Profile online. Once a vendor completes this profile, they are included Comcast's internal supplier diversity tools and activities detailed above.

Program Goals

While it has a diversity spend of 15.4% in California, Comcast believes that it can increase its spend to 20% through the actions defined in the next section. To this end, Comcast will implement the following tactics to improve our results in 2010.

Supplier Diversity Activities Planned for 2010

In 2009, Comcast reorganized its California Procurement and Supplier Diversity resources. This reorganization will allow Comcast to streamline the outreach, vendor management, and data management aspects of its California Supplier Diversity programs in 2010.

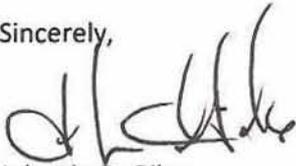
As it did in 2008 and 2009, Comcast will participate in the 2010 California PUC's Small Business Expos in Northern California and will participate in an expo in Southern California, outside its operating area.

Comcast will establish a Supplier Diversity single point of contact for its California Supplier Diversity operations to improve its Outreach effectiveness. Comcast will also enhance its vendor management database to advance our reporting and outreach efforts

In addition, Comcast will co-sponsor in the first-ever California cable industry Supplier Diversity Best Practices Forum this summer. This Forum will provide an opportunity for Comcast to discuss industry-specific Supplier Diversity Best Practices and provide an opportunity to exchange ideas regarding supplier diversity with other cable operators in California

Comcast is committed to continuing to work with the Commission and our supplier diversity partners in our ongoing effort to improve our Supplier Diversity program. Should you have any questions about our efforts, please do not hesitate to contact me at (925) 424-0291.

Sincerely,



Johnnie D. Giles
Vice Present, Government Affairs
Comcast California

- cc: John Gutierrez – Comcast California Region
- Michael R. Peevey – CPUC President
- John A. Bohn – CPUC Commissioner
- Dian M. Grueneich – CPUC Commissioner
- Nancy E. Ryan – CPUC Commissioner
- Timothy Alan Simon – CPUC Commissioner