



COMCAST

2017 Supplier Diversity Annual Report & 2018 Annual Plan

IN COMPLIANCE WITH
ORDER INSTITUTING RULEMAKING INTO THE IMPLEMENTATION OF
PUBLIC UTILITIES CODE SECTIONS 8281-8286 RELATING TO WOMEN, MINORITY AND DISABLED VETERAN
LBGTQ BUSINESS ENTERPRISES

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EXECUTIVE SUMMARY

In 2017, our eighth year of voluntary reporting pursuant to California General Order 156 (G.O. 156), Comcast California spent 9.70% with CPUC-certified suppliers. While this represents a decrease from the 11.38% reported for 2016, we continue to make progress in many areas, and we remain keenly focused on increasing our certified spend going forward.

Notwithstanding recent decreases in the percent of Comcast California's procurement spend with CPUC certified businesses, our direct dollar spend with WMDVLGBTBEs increased by more than 9% from 2016 to 2017, including a greater than 60% increase in direct spending with WBEs. Moreover, since the inception of our program, Comcast has seen significant growth in the supplier diversity space, both enterprise-wide, and in the California Region. For example, Comcast was honored to become the first media and entertainment company inducted into the Billion Dollar Roundtable (BDR), a top-level corporate advocacy organization that promotes supply chain diversity excellence. Each year, Comcast also receives numerous awards and recognition for commitment to supplier diversity.

In 2017, there was a significant amount of time and resources dedicated to our supplier diversity efforts, including hiring additional personnel. Within Comcast California, the supplier diversity role was enhanced to a managerial position. At the company's West Division offices, where many procurement decisions are made, two new executive-level employees are dedicated to supplier diversity. The addition of team members and resources lays the foundation for a strong, successful program and demonstrates our solid commitment to increasing spend with diverse suppliers.

However, our operations and engineering needs require specific technical expertise not widely available within the CPUC Supplier Clearinghouse pool, e.g., skills necessary to upgrade, design and construct our network. With this in mind, we are targeting specific companies that will possibly be able to fulfill these needs through Tier II relationships with our prime suppliers. Ultimately, we envision our investment in the Tier II space will allow these companies to evolve into strong, developed subcontractors that will someday have sufficient scale and expertise to become prime suppliers.

In 2017, Comcast California saw a decline in the subcontracting space due unforeseen changes by our Prime suppliers' utilization of the sub-contractors to meet the Prime's operational needs. In light of the obstacles we faced in 2017, Comcast California continues to share detailed plans with internal and external stakeholders, including the Commissioners, regarding our strategy for increasing diverse spend in the future. For example, one of our major priorities for creating additional business opportunities for CPUC-certified firms in 2018 is through subcontracting. Because more than half of Comcast California's diverse spending is with construction vendors, we are focusing on efforts and resources that will increase prime suppliers' partnerships with diverse business.

COMCAST	2017	G.O. #156 Sec. 9.1.1
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Description of WMDVLGBTBE Program Activities During the Previous Calendar Year

Comcast California continues to ensure efforts with both internal and external stakeholders are consistent and increase the positive impact of supplier diversity within the organization. Internally, one-on-one meetings were conducted between the Supplier Diversity Manager and department leads seeking potential opportunities. Externally, steps were taken to educate suppliers who are interested in working with Comcast, or are currently within our supply chain and interested in an expanded scope. Beginning June 2017, the Comcast California team attended seven matchmaking events – an average of one event per month. Additionally, the team was actively involved in many events supporting various diversity and inclusion focused community organizations. Below is a list of Comcast-based supplier diversity events that Comcast participated in during 2017.

Date of Event	Workshop Event Name
05/03/17	2017 Small Business Expo - Host: CPUC
07/31/17	EXPO'17 - Host: AICCCAL
08/16/17	Minority Business Opportunity Expo - Host: WRMSDC
10/19/17	CPUC Redding Small Business Expo
10/17/17	Elite Meeting the Primes Networking Event and Matchmaking Host: Elite
11/06/17	Astra NorCal Summit - Corporate/Agency Matchmaking
11/09/17	California Cable Supplier Diversity Fair - Host: Comcast, Cox, Charter

Comcast California also supported many Community Based Organization activities, as well as external events, focused on Supplier Diversity. Below is a list of the main events Comcast California attended or participated in 2017.

Date of Event	Event Name
03/22/17	Greenlining Report Meeting - Host: Greenlining
05/03/17	CPUC Small Diverse Expo Host - Host: CPUC
07/23/17	EXPO'17 - Host: AICCCAL Roundtable Discussion
09/15/17	Joint Utilities Committee Meeting - Hosted: SoCal
09/20/17	ICSBD Meeting - Host: ICSBD
10/04/17	En Banc - Host: CPUC
10/10/17	GGBA Meeting - Host: GGBA
10/19/17	CPUC Small Diverse Expo Panel Discussion - Redding
11/06/17	Astra NorCal Summit Hosted: Astra Women's Alliance
11/09/17	7th Annual California Cable Supplier Diversity Fair - Hosted: Comcast, Cox, Charter
11/21/17	Presentation, Comcast CA Supplier Diversity "Elite Northern California Chapter Meeting"
11/26/17	WRMSDC Networking - Host: WRMSDC
12/07/17	WRMSDC Annual Meeting - Host: WRMSDC
12/08/17	AICCCAL Board Meeting
12/12/17	Astra 21st Annual Procurement Summit - Hosted: Astra Women's Alliance

Comcast California is also a member of the following Supplier Diversity organizations:

Organization
Sacramento Asian Pacific Chamber of Commerce
San Joaquin Hispanic Chamber of Commerce
Sacramento Black Chamber
Sacramento Hispanic Chamber of Commerce
Hispanic Chamber of Commerce of Sonoma County
Marin Hispanic Chamber of Commerce
North Bay Black Chamber
Silicon Valley Black Chamber (Santa Clara)
Central CA Hispanic Chamber of Commerce
Tulare-Kings Hispanic Chamber of Commerce
Fresno Metro Black Chamber of Commerce
San Francisco African American Chamber of Commerce
California Black Chamber of Commerce

COMCAST	2017 Comcast Supplier Diversity Report	G.O. #156 Sec. 9.1.2
WMDVLGBTBE Annual Results by Ethnicity		

			2017			
			Direct	Sub	Total \$	%
1	Minority Male	Asian Pacific American	\$6,459,291	\$3,045,468	\$9,504,759	1.87%
2		African American	\$3,533,980	\$0	\$3,533,980	0.69%
3		Hispanic American	\$10,060,997	\$2,330,341	\$12,391,338	2.43%
4		Native American	\$0	\$0	\$0	0.00%
5		Total Minority Male	\$20,054,268	\$5,375,809	\$25,430,077	4.99%
6	Minority Female	Asian Pacific American	\$344,787	\$2,062,311	\$2,407,098	0.47%
7		African American	\$1,800	\$0	\$1,800	0.00%
8		Hispanic American	\$1,785,208	\$0	\$1,785,208	0.35%
9		Native American	\$5,890	\$0	\$5,890	0.00%
10		Total Minority Female	\$2,137,685	\$2,062,311	\$4,199,996	0.82%
11	Total Minority Business Enterprise (MBE)		\$22,191,953	\$7,438,120	\$29,630,073	5.82%
12	Women Business Enterprise (WBE)		\$18,937,523	\$751,646	\$19,689,169	3.86%
	Lesbian, Gay, Bisexual, Transgender					
13	Business Enterprise (LGBTBE)		\$0	\$0	\$0	0.00%
	Disabled Veteran Business					
14	Enterprise (DVBE)		\$109,219	\$0	\$109,219	0.02%
15	Other 8(a)*		\$0	\$0	\$0	0.00%
16	TOTAL WMDVLGBTBE		\$41,238,695	\$8,189,766	\$49,428,461	9.70%
17	Net Procurement**		\$509,498,237			

NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE

** NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS

Direct - DIRECT PROCUREMENT

Sub - SUBCONTRACTOR PROCUREMENT

% - PERCENTAGE OF NET PROCUREMENT

COMCAST	2017	G.O. #156 Sec. 9.1.2
WMDVLGBTBE Direct Procurement by Product and Service Categories		

				Products		Services		Total	
				\$	%	\$	%	\$	%
1	Minority Male	Asian Pacific American	Direct	\$1,000,469	0.20%	\$5,458,822	1.07%	\$6,459,291	1.27%
2		African American	Direct	\$1,620	0.00%	\$3,532,360	0.69%	\$3,533,980	0.69%
3		Hispanic American	Direct	\$345,195	0.07%	\$9,715,803	1.91%	\$10,060,998	1.97%
4		Native American	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
5		Total Minority Male	Direct	\$1,347,285	0.26%	\$18,706,985	3.67%	\$20,054,269	3.94%
6	Minority Female	Asian Pacific American	Direct	\$14,826	0.00%	\$329,961	0.06%	\$344,787	0.07%
7		African American	Direct	\$0	0.00%	\$1,800	0.00%	\$1,800	0.00%
8		Hispanic American	Direct	\$196,922	0.04%	\$1,588,286	0.31%	\$1,785,208	0.35%
9		Native American	Direct	\$5,890	0.00%	\$0	0.00%	\$5,890	0.00%
10		Total Minority Female	Direct	\$217,637	0.04%	\$1,920,047	0.38%	\$2,137,684	0.42%
11	Total Minority Business Enterprise (MBE)		Direct	\$1,564,922	0.31%	\$20,627,031	4.05%	\$22,191,953	4.36%
12	Women Business Enterprise (WBE)		Direct	\$16,090,919	3.16%	\$2,846,604	0.56%	\$18,937,523	3.72%
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
14	Disabled Veteran Business Enterprise (DVBE)		Direct	\$109,219	0.02%	\$0	0.00%	\$109,219	0.02%
15	Other 8(a)*		Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%
16	TOTAL WMDVLGBTBE***		Direct	\$17,765,060	3.49%	\$23,473,635	4.61%	\$41,238,695	8.09%

17	Total Product Procurement	\$116,922,210
18	Total Service Procurement	\$392,576,027

19	Net Procurement**	\$509,498,237
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20	Total Number of WMDVLGBTBEs that Received Direct Spend	43
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NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE
** NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS
Direct - DIRECT PROCUREMENT
Sub - SUBCONTRACTOR PROCUREMENT
% - PERCENTAGE OF NET PROCUREMENT
***SLIGHT DIFFERENCE IN TOTAL OVERALL SPEND DUE TO ROUNDING. <= \$1

COMCAST	2017	G.O. #156 Sec. 9.1.2
WMDVLGBTBE Subcontractor Procurement by Product and Service Categories		

			Products		Services		Total		
			\$	%	\$	%	\$	%	
1	Minority Male	Asian Pacific American	Sub	\$3,036,233	0.60%	\$9,235	0.00%	\$3,045,468	0.60%
2		African American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
3		Hispanic American	Sub	\$0	0.00%	\$2,330,340	0.46%	\$2,330,340	0.46%
4		Native American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
5		Total Minority Male	Sub	\$3,036,233	0.60%	\$2,339,575	0.46%	\$5,375,808	1.06%
6	Minority Female	Asian Pacific American	Sub	\$9,997	0.00%	\$2,052,314	0.40%	\$2,062,311	0.40%
7		African American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
8		Hispanic American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
9		Native American	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%
10		Total Minority Female	Sub	\$9,997	0.00%	\$2,052,314	0.40%	\$2,062,311	0.40%
11	Total Minority Business Enterprise (MBE)	Sub	\$3,046,230	0.60%	\$4,391,889	0.86%	\$7,438,119	1.46%	
12	Women Business Enterprise (WBE)	Sub	\$68,311	0.01%	\$683,335	0.13%	\$751,646	0.15%	
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%	
14	Disabled Veteran Business Enterprise (DVBE)	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%	
15	Other 8(a)*	Sub	\$0	0.00%	\$0	0.00%	\$0	0.00%	
16	TOTAL WMDVLGBTBE	Sub	\$3,114,541	0.61%	\$5,075,224	1.00%	\$8,189,766	1.61%	

17	Total Product Procurement***	\$116,922,210
18	Total Service Procurement ***	\$392,576,027
19	Net Procurement**	\$509,498,237

NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE
** NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS
Direct - DIRECT PROCUREMENT
Sub - SUBCONTRACTOR PROCUREMENT
% - PERCENTAGE OF NET PROCUREMENT
*** (WMDVLGBTBE Only - Comcast does not track non-diverse subcontractors.)

COMCAST	2017	G. O. #156 Sec 9.1.2
WMDVLGBTBE Procurement by Standard Industrial Categories		

SIC Category	Asian Pacific American		African American		Hispanic American		Native American		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	Other 8(a)**	Total WMDVLGBTBE	Total Dollars
	Male	Female	Male	Female	Male	Female	Male	Female							
Raw Materials/Construction/Industrial Services (7,8,15,16,17,26,28,32,33,46,49,52)	\$ 334,590	\$0	\$2,890,869	\$0	\$1,443,688	\$0	\$0	\$0	\$4,669,147	\$322,351	\$0	\$0	\$0	\$4,991,498	\$207,497,338
	% 0.2%	% 0.0%	% 1.4%	% 0.0%	% 0.7%	% 0.0%	% 0.0%	% 0.0%	% 2.3%	% 0.2%	% 0.0%	% 0.0%	% 0.0%	% 2.4%	% 100.0%
Finished Products / Misc. Goods (20,23,25,31,39,50,51,56,57,59,70)	\$ 549,325	\$9,997	\$1,620	\$1,800	\$75,561	\$196,922	\$0	\$5,890	\$841,115	\$10,332,828	\$0	\$109,219	\$0	\$11,283,162	\$38,386,257
	% 1.4%	% 0.0%	% 0.0%	% 0.0%	% 0.2%	% 0.5%	% 0.0%	% 0.0%	% 2.2%	% 26.9%	% 0.0%	% 0.3%	% 0.0%	% 29.4%	% 100.0%
Technical Equipment / Analysis Instruments (34,35,36,38)	\$ 451,145	\$14,826	\$0	\$0	\$270,587	\$0	\$0	\$0	\$736,558	\$6,152,030	\$0	\$0	\$0	\$6,888,588	\$72,468,395
	% 0.6%	% 0.0%	% 0.0%	% 0.0%	% 0.4%	% 0.0%	% 0.0%	% 0.0%	% 1.0%	% 8.5%	% 0.0%	% 0.0%	% 0.0%	% 9.5%	% 100.0%
Transportation / Repair / Food (40,42,45,47,53,54,55,58,75,76)	\$ 3,036,233	\$0	\$459,022	\$0	\$6	\$0	\$0	\$0	\$3,495,261	\$1,468,237	\$0	\$0	\$0	\$4,963,498	\$28,313,565
	% 10.7%	% 0.0%	% 1.6%	% 0.0%	% 0.0%	% 0.0%	% 0.0%	% 0.0%	% 12.3%	% 5.2%	% 0.0%	% 0.0%	% 0.0%	% 17.5%	% 100.0%
Professional Services (61,65,67,73,87,89)	\$0	\$454,686	\$0	\$0	\$9,912,170	\$1,588,286	\$0	\$0	\$11,955,142	\$879,272	\$0	\$0	\$0	\$12,834,415	\$67,508,063
	% 0.0%	% 0.7%	% 0.0%	% 0.0%	% 14.7%	% 2.4%	% 0.0%	% 0.0%	% 17.7%	% 1.3%	% 0.0%	% 0.0%	% 0.0%	% 19.0%	% 100.0%
Legal Services (81)	\$0	\$0	\$182,469	\$0	\$689,326	\$0	\$0	\$0	\$871,795	\$0	\$0	\$0	\$0	\$871,795	\$6,243,188
	% 0.0%	% 0.0%	% 2.9%	% 0.0%	% 11.0%	% 0.0%	% 0.0%	% 0.0%	% 14.0%	% 0.0%	% 0.0%	% 0.0%	% 0.0%	% 14.0%	% 100.0%
Communications / Other Services (27,48,72,78,80,82,83,86,92,96)	\$ 5,133,466	\$1,927,589	\$0	\$0	\$0	\$0	\$0	\$0	\$7,061,055	\$534,451	\$0	\$0	\$0	\$7,595,506	\$89,081,432
	% 5.8%	% 2.2%	% 0.0%	% 0.0%	% 0.0%	% 0.0%	% 0.0%	% 0.0%	% 7.9%	% 0.6%	% 0.0%	% 0.0%	% 0.0%	% 8.5%	% 100.0%
TOTAL	\$ 9,504,759	\$2,407,098	\$3,533,980	\$1,800	\$12,391,338	\$1,785,208	\$0	\$5,890	\$29,630,073	\$19,689,169	\$0	\$109,219	\$0	\$49,428,461	\$509,498,237
	% 1.87%	% 0.47%	% 0.69%	% 0.00%	% 2.43%	% 0.35%	% 0.00%	% 0.00%	% 5.82%	% 3.86%	% 0.00%	% 0.02%	% 0.00%	% 9.70%	% 100.00%

\$0	\$0
Total Product Procurement	\$116,922,210
Total Service Procurement	\$392,576,027
Net Procurement***	\$509,498,237

NOTE:**FIRMS WITH MULT MINORITY OWNERSHIP STATUS
 **FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE
 ***NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS
 TOTAL DOLLARS - TOTAL PROCUREMENT DOLLAR AMOUNT IN THE SPECIFIC SIC CATEGORY
 % - PERCENTAGE OF TOTAL DOLLARS

COMCAST	2017	G. O. #156 Sec 9.1.2 (D.11-05-019 & D.06-11-028)
Number of WMDVLGBTBE Suppliers and Revenue Reported to the Clearinghouse		

Data on Number of Suppliers												
# WMDVLGBTBEs	Number of Suppliers Reported to CHS***						Utility-Specific 2017 Summary					
	MBE	WBE	LGBTBE****	DVBE****	Other 8(a)*	Grand Total	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total
Under \$1 million	6	3		1		10	6	3		1		10
Under \$5 million	11	2				13	11	2				13
Under \$10 million	2	6				8	2	6				8
Above \$10 million	15	8				23	15	8				23
TOTAL	27	19	0	1	0	54	34	19	0	1	0	54

Revenue and Payment Data												
WMDVLGBTBE \$M	Revenue Reported to CHS***						Utility-Specific 2017 Summary					
	MBE	WBE	LGBTBE	DVBE****	Other 8(a)*	Grand Total	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total
Under \$1 million	\$2,150,105	\$1,307,000		\$109,219		\$3,566,324	\$2,498,479	\$1,792,412		\$109,219		\$4,400,110
Under \$5 million	\$35,147,892	\$3,630,314				\$38,778,206	\$7,966,065	\$172,105				\$8,138,170
Under \$10 million	\$16,302,873	\$48,625,632				\$64,928,505	\$346,734	\$886,548				\$1,233,283
Above \$10 million	\$6,462,531,401	\$2,150,354,737				\$8,612,886,138	\$17,016,380	\$18,640,518				\$35,656,898
TOTAL	\$6,516,132,271	\$2,203,917,683	\$0	\$109,219	\$0	\$8,720,159,173	\$27,827,658	\$21,491,583	\$0	\$109,219	\$0	\$49,428,461

NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE

CHS: SUPPLIER CLEARINGHOUSE

***DATA INCLUDES TOTAL REVENUE RECORDED IN CHS FOR ALL CURRENT SUPPLIERS AS ENTERED BY THE SUPPLIERS.

**** REVENUE DATA NOT AVAILABLE IN CHS.

***** LGTBE CERTIFIED THROUGH NGLCC - MERGER TO CPUC DATABASE PENDING

COMCAST	2017	G.O. #156 Sec. 9.1.2
Description of WMDVLGBTBEs with CA Majority Workforce		

Comcast reports 22 of the 54 WMDVLGBTBEs with CA Majority Workforce.

COMCAST	2017	G.O. #156 Sec. 9.1.3
WMDVLGBTBE Program Expenses		

Expense Category	Year (Actual)
Wages	\$60,000
Other Employee Expenses	\$864
Program Expenses	\$46,839
Reporting Expenses	\$0
Training	\$0
Consultants	\$0
Other	\$0
TOTAL	\$107,703

COMCAST	2017	G.O. #156 Sec. 9.1.4
Description of Progress in Meeting or Exceeding Set Goals		

As a percent of total procurement, Comcast California's 2017 spending with CPUC-certified businesses decreased, from 11.38% to 9.70%, due to an increase in total net procurement by the Region, as well as other factors described below.

Over 50% of Comcast spending activity in California is related to network construction. Comcast California is still rebounding from the loss of three Prime diverse suppliers. Comcast California experienced a major loss when one of the CPUC Prime suppliers no longer partnered with Comcast, as they were acquired by one of our other non-diverse Prime suppliers, resulting in an annual reduction of \$16 million as reported in 2016. In addition, a nationally certified diverse Prime supplier that provides key construction services no longer qualifies for certification. The Hispanic American-owned company chose to grow its business and obtain venture capital to become more competitive. In doing so, they became ineligible and unable to maintain their certification through the CPUC Supplier Clearinghouse and the G.O. 156 Program, as required by California statute.

In 2017 one of our Prime suppliers that yields approximately \$60 million in spend made efforts to convert their operation to a WBE, however the efforts were not successful. The Prime was not able to qualify, as the company took a different direction in ownership. With these unfortunate circumstances that continue to impact our Program, Comcast California continues to pursue Prime diverse suppliers by hosting industry-specific events and attending matchmaking opportunities to recruit companies.

Comcast California partners with several large Prime suppliers that provide industry-specific services for the design and construction of our network. With the loss of the contractors, approximately \$76 million was spent with non-CPUC certified suppliers that otherwise would have been spent with these diverse suppliers.

The nature of our construction impacts our diversity spend by limiting the number of construction companies approved to work within our plant. To ensure quality control, Comcast purchases all materials that our construction companies use for expansions and upgrades. This requires our Prime construction companies to set up shipping and receiving of Comcast materials and exposes them to consistent audits throughout the year. To ensure a uniform customer experience across the Region and to maintain quality for our customers, the number of qualifying construction Primes is limited. Moreover, adding a construction company to handle an assigned territory requires tremendous amount of investment by the construction company.

Comcast procures construction, computer hardware, staffing and materials through CPUC-certified companies for use throughout the national footprint. While Comcast California spent a total of \$48 million with CPUC-certified suppliers in 2017, nationally, over \$1.7 billion was spent with CPUC certified suppliers beyond California. One such instance is our procurement of computer hardware, which is procured through a CPUC certified supplier. Our West Division spends approximately \$6 million with this WMBE certified company.

COMCAST	2017	G.O. #156 Sec. 9.1.4
WMDVLGBTBE Results and Goals		

Category	2017 Results	2018 Goals
Minority Men	4.99%	6.17%
Minority Women	0.82%	1.01%
Minority Business Enterprise (MBE)	5.81%	7.19%
Women Business Enterprise (WBE)	3.86%	4.78%
Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	0.00%	0.00%
Disabled Veteran Business (DVBE)	0.03%	0.04%
TOTAL WMDVLGBTBE	9.70%	12.00%

% - PERCENTAGE OF NET PROCUREMENT

COMCAST	2017	G.O. #156 Sec. 9.1.5
Description of Prime Contractor Utilization of WMDVLGBTBE Subcontractors		

Comcast California has many integral Prime suppliers who serve as vital business partners. All of our suppliers have a vital role in the success of our operations; however, the Prime suppliers have leading roles completing our initiatives and goals. We support their partnerships with their subcontractors and foster the relationships to help the subcontractors thrive. With the emphasis on partnerships, we have set the tone in which their relationships with the subcontractors are consistent with our advocacy of our Supplier Diversity Program goals. We expect our Primes to support our goal of 21.5% spend with diverse suppliers. Our goal is to provide resources and opportunities to share the information pertaining to CPUC certified suppliers as well as create opportunities to further develop the diverse supplier subcontractor relationships.

In 2017, Comcast California experienced a decline in Tier II, especially in diverse construction suppliers, our highest procurement spend category. An audit of certification status of Tier II suppliers was completed. Our Supplier Diversity Manager is assisting the Prime suppliers in identifying and hiring diverse sub-contractors throughout our footprint as well as assisting with certifications/re-certifications. In an effort to proactively partner with our Primes, a brief analysis was conducted to identify diverse Tier II suppliers whom may be candidates for becoming Prime construction contractors and further actions are highlighted in the 2018 Annual Plan.

COMCAST	2017 Annual Report	G.O. #156 Sec. 9.1.5
Summary of Prime Contractor Utilization of WMDVLGBTBE Subcontractors		

	Minority Male	Minority Female	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	Other 8(a)*	TOTAL WMDVLGBTBE ***
Direct \$	\$20,054,268	\$2,137,684	\$22,191,952	\$18,937,523	\$0	\$109,219	\$0	\$41,238,694
Subcontracting \$	\$5,375,809	\$2,062,311	\$7,438,120	\$751,646	\$0	\$0	\$0	\$8,189,766
Total \$	\$25,430,077	\$4,199,995	\$29,630,072	\$19,689,169	\$0	\$109,219	\$0	\$49,428,460

Direct %	3.94%	0.42%	4.36%	3.72%	0.00%	0.02%	0.00%	8.09%
Subcontracting %	1.06%	0.40%	1.46%	0.15%	0.00%	0.00%	0.00%	1.61%
Total %	4.99%	0.82%	5.82%	3.86%	0.00%	0.02%	0.00%	9.70%

Net Procurement**	\$509,498,237
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NOTE: *FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE

**NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS

% - PERCENTAGE OF NET PROCUREMENT

Direct - DIRECT PROCUREMENT

Sub - SUBCONTRACTOR PROCUREMENT

***SLIGHT DIFFERENCE IN TOTAL OVERALL SPEND DUE TO ROUNDING. <= \$1

COMCAST	2017	G.O. #156 Sec. 9.1.6
A List of WMDVLGBTBE Complaints Received and Current Status		

No complaints received in 2017.

COMCAST	2017	G.O. #156 Sec. 9.1.7
Description of Efforts to Recruit WMDVLGBTBE Suppliers in Low Utilization Categories		

Comcast Corporation pursues its diversity objectives in the purchase of professional services, including banking and legal services.

Legal Services

Comcast remains committed to working with diverse lawyers and law firms. On October 4, 2017, David L. Cohen, Senior Executive Vice President and Chief Diversity Officer, received the Minority Corporate Counsel Association's Lifetime Achievement Award. This prestigious award exemplifies Comcast's commitment and support of diverse law firms. Comcast was a founding member of the Inclusion Initiative, a collaborative effort of forward-looking companies committed to a measurable increase in the retention of minority- and women-owned law firms by Corporate America. To that end, Comcast spent over \$2 million with diverse law firms in 2017, and also remains committed to working with diverse lawyers at majority owned law firms. Comcast continues to support the National Association of Minority & Women Owned Law Firms' ("NAMWOLF"), a non-profit trade association comprised of minority- and women-owned law firms, as well as diverse bar associations and professional organizations. In 2017, Comcast hosted the *Diversity in the Legal Profession: A Moral Imperative and Professional Obligation*, Continuing Legal Education (CLE) event. Throughout the year, legal professionals from across the company also participated in outreach activities with NAMWOLF and other organizations focused on improving diversity in the legal profession. Comcast also remains committed to working with diverse lawyers at majority owned law firms that do not qualify for MBE status.

Financial Services

Comcast has a longstanding relationship with the diverse banking community and pursues its diversity objectives in the purchase of professional services, including financial services.

For over 20 years, Comcast has demonstrated a strong commitment to hire diverse talent for many of the services we require. Over this time, Comcast either raised capital or used the services of minority-owned, women-owned and service-disabled veteran-owned institutions for bond underwriting, stock repurchases, commercial paper placement, syndication of our minority-owned credit facility and management of some of our assets as described above. Comcast's commitment to this program remains an important aspect of our overall diversification policy.

364-Day Credit Facility: For the 14th consecutive year in 2017, Comcast entered into a 364-day syndicated revolving credit facility with a group of diverse banks led by African American-owned and controlled United Bank of Philadelphia (as administrative agent).

Bond Underwriting: Diverse banks have participated in the underwriting of numerous Comcast bond offerings, adding value to the process and earning significant income along the way. In the corporate bond market, Comcast used eight diverse firms to underwrite approximately \$246 million of financing in 2016 and ten diverse firms to underwrite approximately \$175 million of financing in 2017.

Commercial Paper: Comcast continues to work with The Williams Capital Group, L.P., an African American-owned firm, as one of its placement agencies in the company's commercial paper program. This is an ongoing effort whereby Comcast routinely sells short-term promissory notes to investors for working capital financing.

Diverse Money Managers: Comcast utilizes diverse firms as money managers. In 2016, Comcast used an African American-owned firm to manage a portion of the company's short-term fixed income assets.

Investment Portal: In 2017, Comcast started using an investment portal provided by an African American-owned investment bank to invest more than \$400 million in money market funds domestically and plans to expand on these investments, through this portal, by investing internationally. Comcast continues to look for opportunities to utilize diverse investment firms and banks that have added value and have demonstrated tangible benefits through the delivery of their services to act as brokers in equity transactions.

Diverse Media and Advertising Outlets

Our consistent support of diversity within financial and legal services continued with Comcast California's diversity spend, approximately \$9 million with diverse advertising outlets. Burrell Communications continues to serve as Comcast Corporation's agency of record for African-American creative advertising, and Grupo Gallegos provides support for Comcast Corporation's Hispanic creative advertising and the international segment Agency of Record.

COMCAST	2017	G.O. #156 Sec. 9.1.11
WMDVLGBTBE Fuel Procurement		

Comcast is not engaged in fuel procurement for energy production.

Note: Comcast doesn't set goals based on Product and Service Spend by Category. Comcast's goals based on projected Diverse Spend by Year

COMCAST	2017	G.O. #156 Sec. 10.1.1
WMDVLGBTBE Annual SHORT, MID, AND LONG-TERM Goals by Product and Service Category		

	Short-Term 2018					Mid-Term 2020					Long-Term 2022				
	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE
Products	1.13%	3.92%	0.00%	0.02%	5.07%	1.59%	5.56%	0.00%	0.04%	7.19%	2.06%	7.19%	0.00%	0.05%	9.30%
Subtotal	1.13%	3.92%	0.00%	0.02%	5.07%	1.59%	5.56%	0.00%	0.04%	7.19%	2.06%	7.19%	0.00%	0.05%	9.30%

	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE
Services	6.07%	0.85%	0.00%	0.00%	6.93%	8.61%	1.21%	0.00%	0.00%	9.81%	11.14%	1.56%	0.00%	0.00%	12.70%
Subtotal	6.07%	0.85%	0.00%	0.00%	6.93%	8.61%	1.21%	0.00%	0.00%	9.81%	11.14%	1.56%	0.00%	0.00%	12.70%

TOTAL	7.20%	4.78%	0.00%	0.02%	12.00%	10.20%	6.76%	0.00%	0.04%	17.00%	13.20%	8.75%	0.00%	0.05%	22.00%
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COMCAST	2017	G.O. #156 Sec. 10.1.2
Description of WMDVLGBTBE Planned Program Activities for the Next Calendar Year		

2018 Annual Plan
ENHANCING THE PROGRAM IN 2018
(Section 10.1.2)

Internal

Comcast California's implementation of a successful Supplier Diversity Program begins with renewed support from senior leadership. Our leadership team continues to commit to the program initiatives. Our approach to program collaboration includes support of our program through our Corporate office and our West Division team. We highlight diversity monthly reports and present them to the senior leadership team during quarterly meetings. These reports contain spending activity by department illustrating trends and opportunities for future, strategic diverse spend. Individual stakeholders are responsible for action plans for entering into new contracts with qualified diverse suppliers or resolving any potential issues or gaps. Teams have selected individuals to champion the program and maintain communication during procurement opportunities through discussions and strategies regarding RFPs.

With regard to outreach and technical assistance our leadership team provides resources and efforts to support the program goal attainment. Some of the internal initiatives include:

- Continued Comcast Cable/West Division/California Regional collaboration
- Support efforts to assist CA Region with resources needed to exceed goal
- Strategize and discuss implementation of supplier diversity plans with West Division
- Create opportunities to strategically plan projects based on the business unit needs
- Continued analysis of West Division and Region diverse spend and identification of opportunities

As we enter into 2018, with support from Corporate and West Division, we are continuing to conduct frequent analysis of our diverse spend, comparing to current allocation models. We have explored promising insights into our procurement process, and we are encouraged. For example, we have identified opportunities using a division-approach to increase spend diverse for smaller spend categories, e.g., office supplies as well as ensuring that our accounting identifies all spend that is, in fact, diverse.

External

The Comcast California team plans a proactive approach to soliciting targeted groups, LGBTQ, SDVBE and minority groups such as Native American and African American through consistent outreach.

Outreach opportunities:

- Meet the Buyer; quarterly opportunities to connect diverse suppliers with internal stakeholders
- Partnerships with organizations to increase awareness and process of doing business with Comcast.
- Scholarships for Technical Assistance
- Presentations and mentoring for small, developing companies
- Co-host CA Supplier Diversity Cable Fair with Charter and Cox and Meet the Buyer including Primes
- Participation on panel discussions for CPUC, GGBA, Elite and American Indian Chamber

Tier II

As stated, approximately half of California's spend is allocated to four suppliers that serve as our Prime suppliers within the construction space. The team will actively collaborate with our partners to maintain consistent communication about our Supplier Diversity Program. Some of the initiatives include:

- Support, encouragement and development of Prime's supplier diversity program
- Assist Prime suppliers in investing and committing to incorporate diverse suppliers
- Attend diverse supplier matchmaking/meet the buyer events
- Create partnerships to align and mutually support Supplier Diversity goals and objectives
- Encourage monthly calls/webinars to discuss opportunities, challenges and current spend status

COMCAST	2017	G.O. #156 Sec. 10.1.3
Plans for Recruiting WMDVLGBTBE Suppliers in Low Utilization Areas		

Nationwide, Comcast remains committed to the use of diverse suppliers, which includes increasing partnerships with diverse organizations and Tier II subcontractors, encouraging Prime suppliers to work with diverse vendors, and grow existing initiatives. See <http://corporate.comcast.com/our-values/diversity-inclusion/supplier-diversity>. Comcast California will participate in these company-wide initiatives.

COMCAST	2017	G.O. #156 Sec. 10.1.4
Plans for Recruiting WMDVLGBTBE Suppliers Where Unavailable		

Plans will be developed when or if new areas of technology or services materialize based on future Corporate products and service initiatives.

COMCAST	2017	G.O. #156 Sec. 10.1.5
Plans for Encouraging Prime Contractors to Subcontract WMDVLGBTBE Suppliers		

PLANS FOR ENCOURAGING BOTH PRIME CONTRACTORS AND GRANTEES TO ENGAGE DIVERSE SUPPLIERS IN ALL CATEGORIES, WHICH PROVIDES SUBCONTRACTING OPPORTUNITIES

In 2018, Comcast California continues to strongly support and encourage and our Prime suppliers to utilize more diverse Tier II suppliers. The following will be implemented in 2018:

Scheduled, monthly calls to field questions and discuss new recommendations for diverse suppliers,

Highly encourage Primes' participation at diverse supplier matchmaking events,

Consistent discussions regarding recommended CPUC certified suppliers and

Requested attendance at Comcast hosted "Meet the Buyer" and Cable Fair events.

COMCAST	2017	G.O. #156 Sec. 10.1.6
Plans for Complying with WMDVLGBTBE Program Guidelines		

PLANS FOR COMPLYING WITH THE SUPPLIER DIVERSITY PROGRAM GUIDELINES ESTABLISHED BY COMMISSION AS REQUIRED BY PUBLIC UTILITIES SECTION 8283(c)

Comcast California continues to voluntarily comply with General Order 156. Each year, Comcast California is evolving and enhancing its reporting methods and Supplier Diversity Program.

Annual Energy Product Results by Ethnicity and WMDVLGBTBE Certification

(All dollar figures in \$MM)

Product ¹	Unit	Results by Ethnicity & Gender											Results by WMDVLGBTBE Certification					Total WMDVLGBTBE Procurement Spend	Total Procurement Spend				
		Asian Pacific American			African American			Hispanic American			Native American		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veteran Business Enterprise (DVBE)	Other 8(a) ³						
		Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total	Total	Total	Total	Total			Total			
NATURAL GAS	SHORT TERM	\$																					
		%																					
	LONG TERM	\$																					
		%																					
	Total Natural Gas	\$																					
		%																					
LPG	SHORT TERM	\$																					
		%																					
	LONG TERM	\$																					
		%																					
	Total LPG	\$																					
		%																					
Overall Total \$																							
Overall Total %																						Overall WMDVLGBTBE%:	

Note:
 Short Term Gas - The term of the deal is no longer than one calendar month
 Long Term Gas - The term of the deal is greater than one calendar month but less than 1 calendar year
¹Excludes purchases from the CAISO, other IOUs, utilities, Federal entities, State entities, Municipalities and cooperatives
²Firms with multi-minority ownership status
³Includes Non-WMDVLGBT firms classified as 8(a) of Small Business Administration
 % - percentages calculated by the Row Category Total Procurement Spend

Annual Power Product Results by Ethnicity and WMDVLGBTBE Certification

(All dollar figures in \$MM)

Product ¹	Unit	Results by Ethnicity & Gender												Results by WMDVLGBTBE Certification						Total WMDVLGBTBE Procurement Spend ³	Total Procurement Spend				
		Asian Pacific American			African American			Hispanic American			Native American			Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veteran Business Enterprise (DVBE)	Other 8(a) ⁵	Subcontracting Total						
		Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total	Total	Total	Total	Total	Total	Total						
Power Purchased Renewable Power Products Direct	\$																								
	% ²																								
	\$ ²																								
	% ²																								
Non-Renewable Power Products Direct	Physical																								
	\$																								
	%																								
	\$ ²																								
Fuels for Generation Diesel Direct	Physical																								
	\$																								
	%																								
	\$ ²																								
Nuclear Direct	Physical																								
	\$																								
	%																								
	\$ ²																								
Natural Gas Direct	Physical																								
	\$																								
	%																								
	\$ ²																								
Post 2011 SubTotal of Columns ²	\$																					\$ -	\$ -	\$ -	
SubTotal % of Total Procurement Spend	%																								
ALL SubTotal of Columns ⁴	\$																								
SubTotal % of Total Procurement Spend	%																								

Notes:

¹Excludes purchases from the CAISO, other IOUs, utilities, Federal entities, State entities, Municipalities and cooperatives

²Includes only long term power procurement commitments after June 6, 2011 or as a result of RFOs after June 6, 2011

³Total WMDVLGBTBE spend does not include pre-COD subcontracting values

⁴Includes all power procurement commitments

⁵Firms with multi-minority ownership status

⁶Firms classified as 8(a) by the Small Business Administration includes non-WMDVLGBTBE

% - percentages calculated by the Row Category Total Procurement Spend