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November 14, 2023

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

RE: Diversity Policy Statement Revision of 52 Pa. Code §§ 69.801—69.809  
Docket No. M-2023-3038267

Dear Secretary Chiavetta:

Enclosed please find Verizon's Comments regarding the August 3, 2023 Policy Statement, in the above captioned matter.

Please do not hesitate to contact me with any questions.

Very truly yours,

Suzan D. Paiva

SDP/sau  
Enclosure

**Via Email**

cc: Joseph P. Cardinale, Jr., Assistant Counsel, Law Bureau ([jcardinale@pa.gov](mailto:jcardinale@pa.gov))  
Rhonda L. Daviston, Assistant Counsel, Law Bureau ([rdaviston@pa.gov](mailto:rdaviston@pa.gov))

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Diversity Policy Statement Revision of  
52 Pa. Code §§ 69.801—69.809

M-2023-3038267

**VERIZON COMMENTS**

By order entered August 3, 2023 and published in the Pennsylvania Bulletin on September 30, 2023, the Commission proposes to update its Diversity Policy Statement at 52 Pa. Code §§ 69.801-69.809, following its promulgation of Diversity Reporting Regulations at 52 Pa. Code §§ 51.11-51.13 that were effective September 17, 2022. The proposal makes two general revisions to the Diversity Policy Statement. First, it would encourage all “major” regulated entities, whether or not they are subject to the reporting regulations, to incorporate diversity into their employment practices and procurement of goods and services, with specific recommendations for program design and accountability. Second, the proposal would encourage the “major telecommunications utilities,” which the Commission determined in its rulemaking could not be subject to the Diversity Reporting Regulations due to Chapter 30’s statutory prohibition of new reporting obligations, to report on a voluntary basis the same information required by those regulations.

Verizon supports the first aspect of the revised policy statement and already has substantial programs in place to ensure diversity in its work-force and procurement, as the Commission encourages.<sup>1</sup> Verizon agrees with the Commission’s observation that “[d]iversity is an economic reality that public utilities should include in their corporate strategies now and in the future and they should associate diversity with their business objectives and strategies.” (8/3/2023 Order at 6 and proposed § 69.801).

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<sup>1</sup> These comments are submitted by Verizon Pennsylvania LLC and Verizon North LLC, which are the only regulated Verizon entities that would be “major telecommunications utilities” under the definitions of the proposed policy statement, but the diversity objectives and programs described in these comments apply to the entire Verizon family of companies.

Verizon is committed not only to fostering an inclusive environment, but also to being open and transparent with information about its own diversity and inclusion efforts. Verizon cares about diversity in both our employees and our suppliers, as our actions demonstrate. By celebrating diversity across all spectrums, including but not limited to race, color, religion, age, sex, national origin, sexual orientation, gender identity, disability and veteran/military service status, we are a stronger company and culture. We take pride in our talented and diverse team of people who focus on our customers, every day.

To make it easier for the public (including this Commission) to obtain information about diversity and inclusion at Verizon, we publish detailed diversity and inclusion information on our website. Highlighted there are the facts that over 59% of our U.S. workforce consists of women or people of color and seven of our ten board members are women or racially or ethnically diverse.<sup>2</sup> With respect to diversity of our work force, we make public Verizon's EEO-1 report filed with the federal Equal Employment Opportunity Commission.<sup>3</sup> In addition, Verizon releases an annual Human Capital Report, outlining the company's commitment under the leadership of our Board of Directors and its Human Resources Committee to attract the best talent including a diverse workforce, develop its employees to their full potential, and inspire employees to build their careers at Verizon. This information is part of Verizon's comprehensive Environmental, Social and Governance (ESG) report (starting at page 33).<sup>4</sup> Verizon publishes in its ESG report detailed information on its plans and programs to recruit and retain a diverse workforce and provides statistics on race, ethnicity, and gender of the workforce by business unit and much more

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<sup>2</sup> These are total company figures, not limited to Pennsylvania or to regulated businesses.  
<https://www.verizon.com/about/our-company/diversity-and-inclusion>

<sup>3</sup> <https://www.verizon.com/about/investors/EEO-1-reports>

<sup>4</sup> <https://www.verizon.com/about/sites/default/files/Verizon-2022-ESG-Report.pdf>

information. To embed diversity, equity and inclusion across the employee experience, Verizon also recently created the new position of Senior Vice President - Talent & Diversity in 2022.<sup>5</sup>

Verizon is also committed to diversity and inclusion in its procurement. Verizon maintains a robust supplier diversity program and our website contains information and instructions for diverse suppliers to join the team.<sup>6</sup> In 2022 alone, we spent directly and indirectly \$6.8 billion in goods and services with diverse suppliers, including minority, women, veteran, service-disabled veteran, LGBT, and disability owned businesses. We spent \$55 billion with diverse suppliers in the last ten years. Verizon is a charter member of the Billion Dollar Roundtable, a coalition of companies that each spends more than \$1 billion every year with diverse suppliers.

As a result of these efforts, Verizon is proud to rank 7<sup>th</sup> out of the Fortune 500 on a list of the most progressive companies in diversity and inclusion,<sup>7</sup> and to be one of Black Enterprise's 2023 best companies for diversity.<sup>8</sup> Verizon has been recognized five years in a row for its dedication to the recruitment, retention and advancement of veterans and service members and is the number three 2023 Military Friendly Company.<sup>9</sup> For several consecutive years Verizon has received a 100% score for the Human Rights Campaign (HRC) Foundation's Corporate Equality Index (CEI), recognizing companies that take thoughtful and deliberate steps to establish comprehensive policies, benefits, and business practices providing an equitable experience every day for LGBTQ employees.<sup>10</sup> We have been named one of the best places to work for disability

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<sup>5</sup> <https://www.verizon.com/about/news/verizon-appoints-christina-schelling-leader-talent-and-diversity>

<sup>6</sup> <https://www.verizon.com/about/our-company/supplier-diversity>

<sup>7</sup> <https://fortune.com/2021/06/02/fortune-500-companies-diversity-inclusion-numbers-refinitiv-measure-up/>

<sup>8</sup> <https://www.blackenterprise.com/2023bestcompaniesfordiversity/#articles>

<sup>9</sup> [https://mycareer.verizon.com/life-at-verizon/military/?source=ro-military&CMP=OOH\\_CON\\_OTH\\_22222\\_NA\\_20200529\\_NA\\_NM20200156\\_00001;](https://mycareer.verizon.com/life-at-verizon/military/?source=ro-military&CMP=OOH_CON_OTH_22222_NA_20200529_NA_NM20200156_00001;)  
<https://www.militaryfriendly.com/2023mfc/>

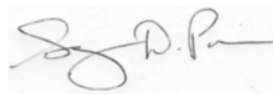
<sup>10</sup> <https://reports.hrc.org/corporate-equality-index-2022>

inclusion, earning a perfect score on the Disability Equality Index for consecutive years.<sup>11</sup> Verizon has received many other awards and recognition for its diversity and inclusion practices.<sup>12</sup>

However, for the same reason that the legislature determined through its enactment of the Chapter 30 provisions at 66 Pa. C.S. § 3015(e) and (f) that new reports should not be required from local exchange telecommunications companies absent a stringent showing of benefits, Verizon is not likely to take up the Commission's encouragement to file voluntarily the detailed and labor-intensive report that the Commission determined in its rulemaking it could not require Verizon to file due to the restrictions of Chapter 30. Nonetheless, Verizon would like to assure the Commission that it intends to continue its commitment to diversity and inclusion, both for its workforce and its suppliers, and to make this information public through its website and publicly issued reports, and that it strongly supports the other aspects of the proposed policy statement.

Dated: November 14, 2023

Respectfully submitted,



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<sup>11</sup> <https://www.verizon.com/about/news/weve-achieved-100-score-again-best-place-work-people-disabilities>

<sup>12</sup> See also <https://www.verizon.com/about/our-company/awards-recognition> (click "Diversity & Inclusion").