SACRAMENTO METROPOLITAN



ROBERT E. SMITH EXECUTIVE DIRECTOR

August 31, 1983

To:

Members, Sacramento Metropolitan Cable Television Commission

From:

Bob Smith, Executive Director

Subject: FRANCHISE PROPOSAL EVALUATION PROCEDURE

This report outlines the general procedures that staff recommends be followed to evaluate the cable television franchise proposals received in response to the July 19, 1983 Request for Proposals. Adjustments to this procedure may be necessary as the process continues. However, the major thrust of the evaluation procedure is not expected to change. Unless modified by Commission direction, staff will present the Governing Bodies with two reports: (1) A Preliminary Report; and (2) A Final Report which will include a written recommendation for a tentative selectee.

There are several significant differences between the previous franchise evaluation process and the one outlined below. The first is that the evaluation and the recommendation will focus on the degree of contractual commitments contained in each applicant's Draft Resolution. Any offering contained in the application, but not in the Draft resolution will be reviewed but will also be discounted in the overall evaluation.

The second difference is that staff will make a public recommendation of a tentative selectee prior to the Governing Bodies' selection. Lastly, the number of categories to be evaluated has been expanded from three to six to allow for more detailed analysis within each category.

The Executive Director will direct the activities of the Franchise Proposal Review Team, which includes the Senior Cable Coordinator; Cable Coordinator; Special Counsel; Hammett and Edison, engineering consultants; and Touche Ross, financial consultants.

1. Preliminary Report

The proposals will be divided into six major subject matter components, as identified below. Individual team members will be responsible for reporting on specific subject areas. Examples of the major types of information that will be reviewed are attached to this report.

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- Organizational and Financial Resources (Forms A-G) -- Touche Ross, Special Counsel
 - * ownership information
 - * corporate financial liability
 - * feasibility of proposed financing plan
 - * reasonableness of pro-forma projections
 - * validity of key assumptions
- 2. System design and construction practices (Form H, I) -- Hammett
 - & Edison
 - * innovation in design
 - * technical specifications
 - * construction schedule
 - * reliability of operations
- 3. Community commitments (Form K, M,G)--staff
 - * scope of community programming resources
 - * benefits to general community
 - * affirmative action
 - * employee training
- 4. Entertainment/Non-Entertainment Service (Form J, L)--staff
 - * array of entertainment/non-entertainment services
 - * reasonableness of rates
 - * feasibility of interactive services
 - * marketing commitments
- 5. Institutional Services (Form I) -- staff
 - * scope of proposed offerings
 - * feasibility of plans
 - * services to business and government
- 6. Customer Relations (Form G, H)--Touche Ross/Hammett & Edison
 - * adequacy of administration
 - * system maintenance and repair standards
 - * procedures for billing, complaints, and collections

Each Team Member will initially evaluate each proposal to ensure its compliance with the Ordinance and to identify inconsistencies or ambiguities contained with the application. Then, the applications will be compared with the Draft Resolution. Inconsistencies between what is promised in the application and its degree of enforceability as contained in the Draft Resolution will be identified. Also, operators will be able to provide written comment on each other's proposals. Clarifying questions regarding inconsistencies or any other ambiguity identified will be sent to each cable applicant for their written response.

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Each subject area will then be evaluated using criteria established by the Team prior to the submission of bids. In some cases, the criteria are those previously used by our consultants in other franchise evaluations. In addition staff will also collect data, where possible, from comparable cable markets, including large systems that have a history of community programming, to determine the reasonableness of the offerings contained in the proposals.

Subsequent analysis will then compare the bids to each other, identifying the relative strengths and weaknesses of each applicant in the specific subject areas. The Preliminary Report will describe the general results of applying the criteria to the bids.

The performance of the applicants in other jurisdictions will be examined. Travel to other systems will be kept to a minimum; rather, telephone, mail surveys and existing reference sources will be utilized as much as possible. Examples of areas to be studied are regulatory history, system construction and technical performance, customer relations, community programming, and affirmative action.

The data gathered from the initial review of the Application and the Draft Resolution, the clarifying questions, and the review of past performance will be compiled into a Preliminary Report. The Preliminary Report will summarize each application and analyze its strengths and weaknesses. This analysis will center on the degree of the contractual commitments contained within each Draft Resolution. Promises which lack sufficient contractual enforceability will be identified.

The Preliminary Report will also provide a basic comparison of the applications in each of the six major subject areas and will include a tabular summary of commitments. However, no recommendations will be made.

Cable applicants and the general public will be able to respond to the Preliminary Report in writing, and at a public hearing scheduled for this purpose.

2. Final Report

After reviewing the comments received from the applicants and the public regarding the Preliminary Report, the Franchise Proposal Evaluation Team will release a Final Report. The Final Report will provide an overall comparison between the applications in the six major subject areas. The contractual commitments identified in each proposal will be compared to the other applicants and a final analysis will be presented.

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Based on the overall comparisons, a staff recommendation of a tentative selectee will be provided for use by the Governing Bodies in making their own determinations. In preparing the final recommendation, a major factor used by staff will be the enforceability of each applicant's offerings as compared to other applicants.

To ensure that the final recommendation accurately reflects the policy concerns of the Governing Bodies, staff believes that the Governing Bodies may need to establish the emphasis to be given to each subject area. Staff recommends that this emphasis be identified after the proposals have been submitted and prior to the completion of the Final Report.

Included with the final recommendation will be justifications of why that particular proposal should be selected, as well as any weaknesses in the application that may need to be addressed during negotiations. Staff will not provide a numerical ranking of the applicants, unless specifically instructed to do so.

A series of public hearings have been built into the schedule for the Governing Bodies to receive applicant and public input on the Final Report and Recommendations.

Following submission of the Final Report, the Governing Bodies will make their selection of the tentative selectee. The selection procedure will be as outlined in the Ordinance and requires a series of secret ballots until a majority of both the City and County agree on a selectee.

RECOMMENDATION

Staff recommends that you receive and file this Proposal Evaluation Procedure, with any modifications or staff directives you desire.

BOB SMITH, Executive Director Sacramento Metropolitan Cable

Television Commission

RES:ab

Attachments

evalreport

SACRAMENTO METROPOLITAN CABLE COMMISSION

PRELIMINARY SPECIFICATION OF EVALUATION CRITERIA

FOR FRANCHISE APPLICATIONS

Evaluation Criteria

Information Relevant to the Criteria

Ownership Qualifications

- Assurance of no conflict of interest, by FCC standards
- Statement of media interests (Form B)

Character Qualifications

- No conflict of interest for public officials
- No criminal proceedings against officials or owners
- Extent of applicant's litigation record as plaintiff against public bodies or a defendent against civil actions charging violation of the public interest
- No revocation or suspension of any . FCC licenses
- Extent of record of franchise violations

- Disclosure statements (Form C)
 - Disclosure statements (Form C) Reports of regulatory authorities in other jurisdictions where the applicant is franchised

Other Cable Holdings

- Number of existing systems owned generally comparable to the proposed system in size and sophistication
- Frequency of dispositions of former franchise interests
- Listing supplied by the applicant (Form D)
- Reports of regulatory authorities in other jurisdictions
- Listing supplied by the applicant (Form D)

Financial Resources

- Financial characteristics of the entity assuming legal liability for the system
- Debt/equity structure of the proposed operator organization Solidity of the proposed
- financing
- Degree to which the Commission's claims to the system's assets will be subordinated
- Relative amount of commitments to build or upgrade systems in other jurisdictions

- Applicant's financial statements
- Proposed financial resources (Form F)
- Evidence to assure availability of financing (Form F)
- Applicant's statements (Form F and draft resolution)
- Information supplied by the applicant
- Reports of regulatory authorities in other jurisdictions

Financial Pro Forma

- Reasonableness of the pro forma projections
 - penetration assumptions
 - capital costs
 - assumed staffing levels and operating costs
 - rates and revenues
 - rate of return
- Sensitivity of projections to changes in key assumptions
- Financial pro formas and supporting documentation (Form G)
- Financial pro formas and supporting documentation (Form G)

FINANCIAL EVALUATION CRITERIA AND STANDARDS

Criteria

Standards

- Reasonableness of the pro forma projections
 - Penetration (basic and pay-to-basic)

 - Capital costs

Staff levels and compenstation

- Projections in range of norms for markets similar to Sacramento
- Sound studies and data submitted in support of projection
- Realism of hardware costs in relation to proposed technical design
- Coverter costs supported by manufacturer's information
- Underground and aerial construction costs supported by sound information and consistent with industry norms
- Drop costs supported by sound information and consistent with industry norms
- Proposed organization similar to staffing of existing systems of similar size and complexity
- Ratios for selected variable staff positions (number per subscriber or per plant mile) consistent with industry norms; for example
 - installers
 - customer services representatives
 - etc.
- Proposed salaries and benefits consistent with industry norms
- Staffing plan in pro forams consistent with staffing indicated in other sections of the proposal (for example, community programming)
- Pay program acquisition costs
- Projected costs supported by pricing information from program suppliers
- Parent company overhead allocation or mangaement fees
- Projected proportionate amount consistent with industry norms

FINANCIAL EVALUATION CRITERIA AND STANDARDS (continued)

Criteria

- Non-entertainment revenue items (for example, home security, advertising, etc.)
- Rate of return
- Rates
- Sensitivity of projections to changes in key assumptions

3. Financial characteristics of the entity assuming legal liability for the system

- 4. Relative amount of commitments to build or upgrade systems in other jurisdictions
- 5. Solidity of proposed financing

Standards

- Projections supported by industry experience or sound marketing studies, and not merely speculative
- Projected rate of return consistent with stated company objectives and industry norms
- Rates used in projections consistent with rates charged for similar services in similar systems
- Rates attractive to the consumer, but sufficient to produce a reasonable rate of return
- Amount rates would have to change to produce the same projected rate of return if selected "soft" assumptions materialized unfavorably for the operator (for example, if institutional revenues were significantly less than projected)
- Comparitive financial strength of the proposing firms, as measured by:
 - Long-term debt to equity
 - Total liabilities to total capital
 - Net income to revenue
 - Return on assets
 - Interest coverage before federal income tax
- Sufficient coverage (as measured by capital expenditures to net worth ratio) to meet all planned commitments
- Documentation of firm lender's commitment
- Comparitive equity commitment and strength of assurance of equity availablity

FINANCIAL EVALUATION CRITERIA AND STANDARDS (continued)

Criteria

6. Degree of which the Commission's claims to the system's assets will be subordinated

Standards

 Assurance that Commission's claims will not be subordinated to other parties, consistent with reasonable assurances to lenders required to obtain financing

Criteria for Evaluation of Proposals

- System capacity
 - initial channel capacity
 - expansion capability
 - flexibility for accommodating other services
- System configuration
 - innovation in design
 - use of state-of-the-art equipment and design
 - engineering quality of design
- Equipment selection
 - manufacturer history
 - quality level
 - compatibility
 - availability
- Technical specifications
 - central facilities
 - distribution system
 - subscriber premises equipment
- Construction schedule
 - general adequacy of planning
 - details of undergrounding policies
 - period and order of construction
- Reliability of operations
 - redundancy or backup in design
 - selection of components
 - maintenance program
 - complaint procedures

Hammett & Edison, Inc. Consulting Engineers July 29, 1983

General Procedure for Technical Review of Sacramento Cable Proposals

- 1. A brief review will be done of each entire Proposal and Draft Resolution to obtain an overview of what has been proposed and to look for gross inconsistencies or incompatibilities.
- 2. Those specific portions of the Proposals for which our firm is responsible will be divided among those reviewing the applications and reviewed in detail. During this review, a list of questions or points of confusion or ambiguity will be collected. Copies of certain key pages that summarize the essence of technical content of each Proposal will be collected.
- 3. Based upon the understanding and references collected from the review of the Proposal, the Draft Resolution will be reviewed. A check will be made of those items appearing in the Proposal versus those contained in the Resolution; any consistencies or ambiguities will be tabulated.
- 4. Based upon the contents of the Proposal and the Resolution, a check will be made to verify that the requirements of the Ordinance and the mandatory provision of the Resolution have all been met. Any inconsistencies will be noted.
- 5. As appropriate, other systems owned by the operators will be contacted to obtain information on the quality of operation and also to resolve some of the questions regarding specific services or equipment proposed.
- 6. As appropriate, FCC records will be checked to determine whether substantial violations of FCC Rules have occurred, and to obtain copies of the results of any FCC inspections.
- 7. As appropriate, equipment vendors and other sources will be contacted to assist in resolving all possible issues.
- 8. All remaining unanswered questions will be organized for inclusion in the interrogatories to the bidders.
- 9. Based upon the actual set of applications received, the series of comparative evaluation criteria will be finalized to permit comparison of technical provisions.
- 10. A report will be prepared summarizing the technical provisions of each application, stating all unresolved questions, stating any points of technical deficiency or failures to meet requirements, and comparing the applications using the comparative criteria established.

Hammett & Edison, Inc. Consulting Engineers August 22, 1983

Parameters of an Evaluation Matrix

The evaluation matrix consists of two sets of elements: the first one is a list of primary system components or sub-components, somewhat paralleling those listed in the equivalency categories of Section II.b.10.g of the Resolution; the second is a list of questions which will be applied, as appropriate, to the facilities in each of the equipment categories.

System Components

- 1. Off-air reception and headend processing equipment.
- 2. Satellite reception facilities.
- 3. Studios and mobile vans.
- 4. Distribution system hubs.
- 5. Microwave interconnect facilities.
- 6. Cable interconnect facilities.
- 7. Microwave distribution facilities to hubs.
- 8. Subscriber network distribution facilities.
- 9. Institutional network distribution facilities.
- 10. Subscriber premises equipment.
- 11. Institutional user equipment.
- 12. Any other key equipment proposed.

Questions regarding each component:

- 1. Is the overall engineering quality acceptable?
- 2. Is a particularly innovative design used; is state-of-the-art design used?
- 3. Is flexibility included that will permit future expansion of services or capacity?
- 4. Is equipment of a respectable and reliable vendor proposed?
- 5. Is equipment currently available; will it be available in the time frame required?
- 6. What are the appropriate measures of capacity, and how do they compare to other bids?
- 7. Do facilities or functions proposed meet the requirements of the RFP?
- 8. Do the specifications proposed meet those stated in or required by the RFP?
- 9. Do the proposed specifications fall within reasonable industry standards?
- 10. Will state-of-the-art quality be provided for signals and services?
- 11. Is each component compatible with other elements of the system?
- 12. Does the design include adequate reliability or redundancy, if applicable?
- 13. Are there any inconsistencies in the various descriptions of each component?
- 14. Will any element of the proposal likely cause degradation in signals or services?
- 15. Are there any apparent technial deficiencies?
- 16. Are sufficient equipment, personnel, and procedures provided for adequate maintenance?
- 17. Has reasonable planning been done for construction?
- 18. Are any difficulties anticipated in constructing or activating the facility?

Questions Regarding Technical Performance (for Inclusion in "Survey of Other Systems" Questionnaire)

Please supply a copy of each of the last two proofs of performance done in accordance with the FCC Rules.

What major items of test equipment are available for use by system personnel?

Describe the system monitoring done on an ongoing basis:

Are a fixed set of test points used? What is the number of test points? What is the frequency of visits to the test points? What parameters are observed or measured at each visit? What procedure is used for monitoring and reporting results?

Is standby power included for central facilities?

Is standby power included on the distribution system?

How many different manufacturers and models of converters are in use?

What is the approximate current number of total subscribers?

Estimate the churn rate if known.

Estimate the number of service calls per week or per month.

Describe the system maps maintained:

When were the maps last fully updated? How are ongoing changes entered? Are copies provided to technicians, or is there a single copy?

What is the total number of system personnel?

What is the number of engineering and technical personnel?

Hammett & Edison, Inc. Consulting Engineers August 22, 1983

Services and Rates (Forms J,L) Evaluation Checklist Dollars in (000)

I. Array, Variety and Cost of Services:

Industry Comparisons

Bidder 1

Bidder2

Bidder3

- a. How many Tiers? How many channels per Tier? What is the cost per Tier?
- c. What is the Installation cost per Tier?
- d. What is the total channel capacity?
- e. How many channels used by Year 5?
- f. How many Pay Services by Tier?
 List/Cost

Tier 1

--list--

Tier 2

-list-

Tier 3

-List-

h. Audio Services:

How many audio channels?

What are the costs for installation/monthly services?

When are the services scheduled to be offered?

Are there any conditions?

Services and Rates (Forms J,L) Evaluation Checklist Dollars in (000)

Industry Comparisons

Bidder 1

Bidder2

Bidder3

II. Interactive Services & Cost:

How many Interactive Subs?

What is the % to Basic?

a. Home Security Installation and Monthly Cost: Describe hardware and software

What is the installation Cost? Monthly cost?

What verification procedures are followed prior to notifying authorities?

What are standards for response time between alert activation and initiating verification or notifying authorities?

When is the system scheduled to be operational?

Are their any other conditions?

b. Telebanking Services:

How many banking institutions participating?

Do the services include?

Account balancing/balance Transfer between established accounts Bill paying/scheduling/

Are the services operational (o) or developmental (d)?

When are the services scheduled to be offered?

Are their any other conditions?

What are the costs?

c. Home shopping services:

Do the services include:

Catalog display

Selection of a item and description

Services and Rates (Forms J,L) Evaluation Checklist Dollars in (000)

Industry Comparisons

Bidder 1

Bidder2

Bidder3

Automatic code and ordering
What are the costs?
Are their any conditions?
When are the services scheduled to be offered?
Are the services operational or developmental?

d. Electronic Mail Services:

Are their any conditions?

Do the services include:
Letter, card, mail transmittal
Storage and notification
What are the costs for service?
When are the services scheduled to be offered?
Are their any conditions?
e. Pay-per-view:
Describe any services offered:
What types of programs are planned for ppv?
Are contracts identified?
When is the services to begin?

f. Are their any other interactive services? Premium channels for Financial, news, information and data?

What are their costs?
Are their any conditions?

DATA COMPANY 1 COMPANY 2 COMPANY 3 INDUSTRY REFERENCE POINTS

A. FACILITIES

- 1. What is the total number of facilities?
 - a. How many households are served per facility?
- 2. How large is each facility?
 - a. Is there enough space for the proposed uses?
- 3. Where are the facilities proposed to be located?
 - a. Are they dispersed throughout the franchise area?
 - b. Are they served by public transportation?
 - c. Are they accessible to the handicapped?
- 4. What is the total cost of all facilities?
 - a. What is the cost per facility?
 - b. What is the cost per square foot?
 - c. Is this cost documented in Form G.?
- 5. What will each facility be used for? (access, IO, etc)
 - a. How will use time be apportioned?

B. EQUIPMENT

- 1. What equipment is contained in each facility?
 - a. Is this an appropriate amount for the proposed uses?
- 2. What are the specifications for the access studio equipment?
 - a. Do they have automatic controls?
 - b. Are they easy to use?
 - c. Are they durable?
 - d. Are they current models?
- 3. How much portable equipment is proposed for access?
- 4. What are the specifications for proposed access equipment?
 - a. Is it easy to use?
 - b. Is it lightweight?

Where appropriate, bids will be

compared to actual operations of selected cable markets

COMPANY 1

- c. Is it durable?
- d. Is it current equipment?
- 5. Are there any live origination capabilities for either LO or access?
 - a. microwave vans
 - b. modulators
 - c. drops
- 6. What equipment is proposed for Local Origination?
 - a. What are actual specifications
 - b. What are quality comparisons?
 - c. Is it current?
- 6. What is the total cost for access equipment?
- 7. What is the total cost for Local Origination equipment?
- 8. How much is budgeted for maintenance over the live of the franchise?
- 9. How much is budgeted for replacement of equipment over the live of the franchise?
- 10. What is the engineering back-up provided for access and LO production?
 - a. Cost of master control playback?
 - b. Are there waveform monitors and test equipment available?
- 11. Are all equipment costs verified in Form G?

C. COMMUNITY PROGRAMMING PERSONNEL

- 1. How many full-time staff are proposed for access?
- 2. How many full-time staff are proposed for LO?
- 3. Are there sufficient staff to cover the number of facilities proposed?
- 4. Are there sufficient staff to cover the number of hours proposed for productions?
- 5. What are the job descriptions for the LO/access positions?
- 6. What kind of staff training is proposed?

INDUSTRY REFERENCE POINTS

COMPANY 1

- 7. Are there staff shared between LO and access?
- 8. What are the salary ranges of production personnel?
 - a. How does that compare with the industry standards?
- 9. Are there any volunteer/intern programs?
 - a. Do volunteers/interns take the place of staff?
- 10. Is the cost of personnel accurately reflected in Form G, q. 18?

D. TRAINING OF COMMUNITY USERS

- 1. How many staff people are devoted to training?
- 2. Are there certification procedures for use of equipment?
- 3. How often does training occur?
- 4. What curriculum areas are included in training?
- 5. Is training provided throughout the franchise?

E. PROGRAMMING

- 1. How many channels are devoted to community programming?
 - a. Public access?
 - b. Educational Access?
 - c. Government access?
 - d. other community access?
 - e. Local Origination?
 - f. Leased access?
- 2. What tiers are the channels located on?
- 3. How many hours are projected for LO production?
- 4. How many hours are guaranteed by the Operator under .338 community Programming?
- 5. What percentage of community programming hours will be locally produced?

COMPANY 1

INDUSTRY REFERENCE POINTS

- 6. Who will be primarily responsible for local production?
- 7. Who will determine program policies such as content control, scheduling, etc?

OPERATING SUPPORT

- 1. What is the total support for access?
 - a. What is the cost per hour of programming?
 - b. What is the cost per subscriber?
 - c. Is is verified in Form G pro-formas?
- 2. What is the total support for Local Origination?
 - a. cost per hour?
 - b. cost per subscriber?
 - c. How much of the cost of LO is off-set by advertising revenues and program sales?
 - d. verified in form G?

INDEPENDENT BODY

- 1. What is proposed structure of the Independent Body?
 - a. membership criteria?
 - b. Board representation and replacement
 - c. Accountability to Commission and Company?
- What are the propsed duties of the Independent Body?
- 3. How much is proposed for administrative support of the Independent Body?
 - a. 20-year projection?
 - b. verified in form G?
- 4. Is there any money for grant distribution?
 - a. verified in Form G.

H. GRANIS TO OTHER ENTITIES

- 1. Is there any support proposed for City government?
 - a. What kind of resources
 - b. Purposes?
 - Verified in Form G?

- 2. Is there any support proposed for County government?
 - a. What kind of resources
 - b. What purposes?
 - c. Verified in Form G
- 3. Is there any other .342 support?
 - a. What kind of resources?
 - b. what purposes?
 - c. Verified in Form G?
- 4. Is there any support proposed for .344 entities?
 - a. Who is recipient?
 - b. What kind of resources?
 - c. What purposes?
 - d. Verified in Form G?
- 5. Are there other community committments not listed elsewhere?
 - a. Who is recipient?
 - b. What kind of resources?
 - c. What purposes?
 - d. Form G verification?

I. LOCAL PROGRAMMING PHILOSOPHY

- 1. How often will community ascertainments be done?
- 2. Is there a budget for ascertainment?
 - a. Verified in Form G?
- 3. Who will be responsible for ascertainments?
- 4. What are the local programming goals as articulated in the philosophy?

J. PROMOTION

- 1. What activities are proposed for promotion of access programming?
 - a. What is the proposed budget?
 - b. Is this verified in Form G?
 - c. Which staff persons are responsible for promotion?

INDUSTRY REFERENCE POINTS

COMPANY 1

2. What activities are proposed for promotion of Local Origination programming?

TRACK RECORD IN OTHER SYSTEMS

- 1. How many system in operation currently have access/LO? a. What percentage of total households does this represent?
- What is the size of the LO/access budgets?
- 3. How many channels are devoted to LO/access programming? a. How many hours per week are channels used?
- 4. What is the size of LO/access staff?
- 5. Has the operator won any awards for local programming?
- 6. Is the city satisfied with the Operator's performance in community programming?

(catv056)

AFFIRMATIVE ACTION EVALUATION CRITERIA

FORM M

These are initial criteria only. Specific criteria will be developed in conjunction with the County Affirmative Action Officer.

- 1. Employment Practices (Q. M-1)
 - a. Statement of goals
 - --Population parity comparison (compared to EDD figures)
 - --horizontal parity (% employed in all job categories)
 - --vertical parity (% employed in different job categories)
 - b. Proposed enforcement measures of stated goals:
 - --internal monitoring and reporting procedures
 - --evaluation criteria and frequency of updating of goals
 - --recruitment, selection, promotion, and other personnel procedures
 - --relationship to external agencies: SMCTC, Fair Employment and Housing Department, etc.
- 2. Minority and Female Businesses Participation (Q. M-2)
 - a. Percentage of contracts (prime, general, or subcontractor) set aside for MBE, breakdown between women and minority businesses
 - b. Definition of MBE, if defined by company (ownership %)
 - c. Description of recruitment procedures, advertising, etc.
 - d. Monitoring, evaluation and enforcement procedures, frequency and effectiveness
 - e. Are contractors required to have AA plans?
- 3. Training and Certification (Q. G.19)
 - a. Proposed training programs:
 - --entry level
 - --promotional
 - b. Source of training:
 - --in-house
 - --outside
 - --sub-contract
 - c. Total dollar commitment to training personnel