BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIF

Joint Application of Charter Communications, Inc., Charter Communications Holdings, LLC, and Cox Enterprises, Inc. for Approval Pursuant to Public Utilities Code Section 854 of the Indirect Transfer of Control of Cox California Telcom, LLC (U-5684-C).	**Application 25-07-016** (Filed July 30, 2025)	**FILED** 07/27/26 08:00 AM A2507016

OPENING COMMENTS OF THE NATIONAL INSTITUTE FOR WORKERS' RIGHTS ON THE PROPOSED DECISION AND THE ALTERNATE PROPOSED DECISION

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Pursuant to Rule 14.3(a) of the Commission's Rules of Practice and Procedure, the National Institute for Workers' Rights ("NIWR") respectfully submits these opening comments on the Proposed Decision of Administrative Law Judge Jamie Ormond ("PD") and the Alternate Proposed Decision of Commissioner Matthew Baker ("APD"), both issued July 9, 2026. These comments identify legal and technical errors and make specific reference to the challenged provisions and to applicable law, as Rule 14.3(c) requires; the recommended changes are set out in the Subject Index above and supported by proposed findings of fact, conclusions of law, and redlined ordering-paragraph text in Appendix A.

I. INTRODUCTION AND SUMMARY

NIWR writes on a single subject: the workforce-equity dimension of the public interest under Public Utilities Code Section 854(c)(4) and (c)(6).

Both the Proposed Decision and the Alternate Proposed Decision would approve the Transfer subject to conditions. They take somewhat different approaches, and NIWR takes no position on the many issues that distinguish them. NIWR's request is the same regardless of which decision the Commission adopts as the basis for its final decision: that decision should include enforceable workforce-equity conditions sufficient to support the finding that the Transfer is fair and reasonable to affected employees, consistent with the standard the Commission set earlier this year in the Verizon-Frontier transaction, Decision 26-01-023.[1]

[1] D. 26-01-023, Decision Granting Application Subject to Conditions and Approving Related Settlements (issued Jan. 15, 2026).

The two decisions currently differ in how far they carry the workforce dimension. The Proposed Decision includes two workforce-equity provisions—Ordering Paragraph 16 (a technician apprenticeship and recruitment effort, including outreach to candidates in ESJ and Tribal communities) and Ordering Paragraph 17 (ten years of ESJ hiring-data reporting). These are a constructive start, and NIWR supports retaining them; but as drafted they are written in permissive terms and collect only geographic hiring data, so they stop short of the Verizon-Frontier standard. The Alternate Proposed Decision does not presently include comparable workforce-equity conditions. NIWR respectfully urges that, whichever decision forms the basis for the final decision, the Commission include the conditions described below.

Specifically, NIWR asks that the final decision include (1) a mandatory recruitment pipeline; (2) workforce reporting that captures hiring, compensation and promotion outcomes disaggregated by race, ethnicity, and gender and monitors the workforce effects of Charter's February 2026 letter to the FCC; and (3) employee belonging-and-inclusion questions in surveys. Appendix A sets out redlined ordering-paragraph text drafted so that it can be incorporated into either decision.

Section 854(c)(4) makes fairness to affected employees a required element of the public-interest determination, and administrative law principles suggest that the Commission has a duty to follow its prior precedent in the Verizon-Frontier proceeding or otherwise explain such a departure. The conditions NIWR proposes give the final decision the record basis for the Section 854(c)(4) finding and keep it consistent with Verizon-Frontier, as explained in Part IV below.

II. THE PROPOSED DECISION CORRECTLY TREATS WORKFORCE EQUITY AS PART OF THE SECTION 854 PUBLIC INTEREST, AND ITS TWO WORKFORCE-EQUITY PROVISIONS SHOULD BE RETAINED

Section 854(c)(4) requires the Commission, in determining whether the Transfer is in the public interest, to find the transaction "fair and reasonable to affected public utility employees, including both union and nonunion employees." Section 854(c)(6) requires the Commission to assess effects on "communities in the area served," including minority and low-income communities. The PD correctly reads these criteria to find that the Joint Applicants "failed to demonstrate that the transaction will be fair and reasonable to employees and will not result in a significant adverse impact on the … public interest."[2]

Acting on that finding, the PD adopts two workforce provisions. Ordering Paragraph 16 directs the post-merger company to provide a Broadband Field Technician Apprenticeship Program, to "promote high road career paths and economic opportunities in [ESJ] communities," and to "search for candidates within the ESJ and Tribal communities in its footprint." Ordering Paragraph 17 requires a ten-year "report detailing its success in incorporating candidates from [ESJ] communities, including ESJ hiring data, hiring outreach methods, changes, and updates." Both are sound in principle and responsive to the record, including NIWR's reply comments and the testimony of CforAT's Paul Goodman. If the final decision is based on the Proposed Decision, NIWR urges the Commission to retain both; if it is based on the Alternate Proposed Decision, NIWR urges the Commission to include equivalent conditions. The remainder of these comments explains why, in either case, the conditions should be framed as set forth below.

These conditions rest on the existing record, not on new evidence. The Proposed Decision itself found that the Joint Applicants "failed to demonstrate that the transaction will be fair and reasonable to employees,"[3] and it adopted Ordering Paragraphs 16 and 17 in response; the workforce dimension was raised by TURN and CforAT and developed in the testimony of CforAT's Paul Goodman.[4] The companies' letters to the FCC and Charter's Public Interest Statement are public filings in the parallel federal proceeding, of which the Commission may take official notice,[5] and the standard NIWR asks the Commission to apply is its own Decision 26-01-023. NIWR does not seek to reopen the record or to add a new subject; it asks the Commission to refine conditions the Proposed Decision already adopted and to conform them to its own recent precedent.

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[2] PD at 54 (Section 12.2).

[3] PD at 54 (Section 12.2).

[4] Exh. 81 (Rebuttal Testimony of Paul Goodman) at 7–8, 16.

[5] *See* Letter from Vandana Venkatesh, Verizon, to Chairman Brendan Carr, FCC, WC Docket No. 24-445 (May 15, 2025) ("Verizon FCC Letter"); Letter from Jamal Haughton, Charter, to Chairman Brendan Carr, FCC, WC Docket No. 25-233 (Feb. 26, 2026) ("Charter FCC Letter"); Joint Applicants, Public Interest Statement, WC Docket No. 25-233 (July 14, 2025) ("Public Interest Statement").

III. THE TWO WORKFORCE-EQUITY PROVISIONS SHOULD BE STRENGTHENED—AND ANOTHER ADDED—SO THEY CAN SUPPORT THE REQUIRED SECTION 854(c)(4) FINDING

The two workforce-equity provisions in the PD are an important marker. But a provision that imposes no binding obligation, and a report that omits the data needed to detect unfairness, are far from sufficient to support an affirmative finding that a transaction is "fair and reasonable to affected public utility employees"—particularly where, as here, the acquirer has dismantled the internal infrastructure that ordinarily produces fairness.

A. Ordering Paragraph 16 (recruitment pipeline) should be mandatory and tied to the Commission's ESJ Working Group.

As written, Ordering Paragraph 16 says the company "may consider" partnering with the California State University and community college systems and "should make additional effort" to recruit ESJ and Tribal candidates. Permissive language of this kind is unenforceable; it commits Charter to nothing and gives the Commission nothing to monitor. The Commission made this same pipeline commitment mandatory in Verizon-Frontier, ordering that Verizon and Frontier "shall establish a recruiting pipeline from California State Universities and California community colleges, aiming to recruit from underrepresented populations in consultation with the Commission's ESJ Working Group."[6] NIWR asks the Commission to conform Ordering Paragraph 16 to that precedent, as redlined in Appendix A: mandatory ("shall establish"), developed in consultation with the ESJ Working Group, and with targeted outreach in ESJ communities—including communities like Ontario, California, that have borne a disproportionate share of Charter's recent California layoffs.

[6] D. 26-01-023 at 117 (Ordering Paragraph 6).

B. Ordering Paragraph 17 (reporting) should capture compensation and promotion outcomes and monitor the effects of Charter's FCC letter.

Ordering Paragraph 17 collects only "ESJ hiring data"—the number of hires from designated geographic communities. Geography is a proxy, not a measure of workforce equity. Hiring counts say nothing about whether workers of different backgrounds are paid and promoted on equal terms for substantially similar work—which is precisely what the California Equal Pay Act and FEHA require,[7] and precisely what the Section 854(c)(4) fairness inquiry concerns. In Verizon-Frontier the Commission required both voluntary demographic self-identification in employee surveys—by "gender, race, disability status, veteran status, or [LGBT] identity"[8]—and an annual report "that monitors and reports … the effects of changes/impacts on its supplier and workforce, after Verizon and Frontier have implemented the changes detailed in the May 2025 letter to the Federal Communications Commission," specifying "any changes that have been detrimental to their maintaining a diverse/equitable workforce."[9]

That last requirement is directly on point. The Commission ordered Verizon to monitor and report the workforce effects of the very equal-opportunity rollback Verizon had promised the FCC. Charter made a materially identical promise to the FCC in February 2026.[10] Ordering Paragraph 17 should be conformed, as redlined in Appendix A, to require reporting of hiring, compensation, and promotion outcomes for the California workforce disaggregated by race, ethnicity, and gender, and to require the post-merger company to monitor and report the workforce effects of the changes announced in its February 26, 2026 FCC letter, served on the Public Advocates Office and other parties the Commission designates. These changes strengthen this provision in the PD.

C. *Another key condition – belonging-and-inclusion questions in employee surveys – should be added in order to monitor the state of the workplace environment for Charter employees.*

Establishing a recruitment pipeline (Ordering Paragraph 16) helps ensure that qualified candidates from ESJ communities are not overlooked. Annual disaggregated reporting on hiring, compensation and promotion (Ordering Paragraph 17) provides the data that can surface inequities

[7] Lab. Code § 1197.5; Gov. Code §§ 12900 et seq.
[8] D. 26-01-023 at 118 (Ordering Paragraph 9).
[9] *Id.* at 119 (Ordering Paragraph 10).
[10] *See* Charter FCC Letter; Parts IV.B–IV.C, *infra*.

that may need remediation. Requiring belonging-and-inclusion questions in employee surveys was the third pillar of the workforce-equity conditions imposed by the Commission in Verizon-Frontier for good reason. This kind of qualitative data from Charter employees can surface concerns that, if left unaddressed, can lead to unlawful discrimination (including harassment) that may not show up in the outcomes reported under Ordering Paragraph 17.

In its regular employee surveys, the company should include questions on belonging and inclusion and on "satisfaction with career advancement opportunities, compensation, work-life balance, and company culture," and that allow employees to self-identify by demographic characteristics—mirroring Verizon-Frontier Ordering Paragraph 9. Proposed ordering language appears in Appendix A. Requiring these questions as part of the regular employee surveys that all major companies like Charter do is a form of monitoring and disclosure that imposes minimal burden.

These conditions are lawful and do not require preferential treatment.

Nothing NIWR proposes would require Charter to make a hiring, promotion, or compensation decision on the basis of race, sex, or any other protected characteristic. Collecting and reporting workforce data, surveying employees, and recruiting through public colleges and universities are established compliance practices. The same EEOC and Department of Justice guidance the Joint Applicants cite in their FCC letters distinguishes unlawful preferences from lawful equal-opportunity compliance, and NIWR's conditions fall on the lawful side of that line.[11] They likewise do not conflict with California Proposition 209, which bars the State from granting preferential treatment on the basis of race or sex:[12] NIWR's conditions call for data collection, monitoring, and outreach, not preferences. In that respect the conditions are in the same spirit as the Commission's own General Order 156, which advances equal opportunity in procurement in significant part through outreach and reporting.[13]

[11] *See* Verizon FCC Letter n.1; Charter FCC Letter n.1 (both citing EEOC and Department of Justice guidance).

[12] Cal. Const., art. I, § 31.

[13] These conditions involve even less risk than GO 156 as there are no hiring targets in these conditions.

IV. THE COMMISSION SHOULD FOLLOW VERIZON-FRONTIER OR EXPLAIN WHY CHARTER'S WORKERS ARE ENTITLED TO LESS

A. Verizon-Frontier is the controlling benchmark.

Six months ago, in Decision 26-01-023, the Commission approved Verizon's acquisition of Frontier and imposed the very workforce-equity conditions at issue here—a recruitment pipeline (OP 6), employee belonging-and-inclusion surveys (OP 9), and an annual workforce-impact report tied to the company's FCC letter (OP 10).[14] Both transactions arise under the same statute, are measured against the same ESJ Action Plan, and present the same question: what the public interest requires of a telecommunications acquirer that is curtailing its equal-opportunity infrastructure at the very moment it seeks approval of a major transaction. The Commission answered that question in Verizon-Frontier. Nothing in this record warrants a different answer.

Charter may seek to distinguish Verizon-Frontier on the ground that the record was developed differently or that the settlement postures differ. Any such differences go to other issues; they do not bear on the Section 854(c)(4) fairness question, which is governed by the same statute and measured against the same ESJ Action Plan in both proceedings. And if the Commission believes some difference justifies a different workforce standard for Charter's employees, Section 1705 requires it to identify that difference and support it with findings.

B. Charter's and Verizon's letters to the FCC are strikingly similar.

The clearest indicator of the similarity of these companies' approach to equal opportunity is the companies' own words. To obtain FCC approval, each company wrote to Chairman Brendan Carr renouncing its diversity, equity, and inclusion practices—Verizon's Chief Legal Officer on May 15, 2025, and Charter's General Counsel on February 26, 2026. The two letters track one another point for point:

Equal-opportunity practice	Verizon — Letter to FCC (May 15, 2025)	Charter — Letter to FCC (Feb. 26, 2026)
Diversity leadership & dedicated roles	Eliminated its DEI team and all DEI-focused roles; affected staff reassigned to general "HR talent objectives."	Has "no roles dedicated to diversity and inclusion efforts"; the former Chief Diversity Officer was reassigned; ended the External

[14] D. 26-01-023 at 117–119 (Ordering Paragraphs 6, 9, and 10).

Equal-opportunity practice	Verizon — Letter to FCC (May 15, 2025)	Charter — Letter to FCC (Feb. 26, 2026)
		Diversity Council and Executive Steering Committee.
Workforce-diversity / representation goals	Removed the women-and-minority representation metric from the management bonus plan; "will no longer maintain any workforce diversity goals."	"Does not maintain workforce diversity targets."
Recruitment & advancement programs	No "hiring, training, leadership or development programs that are limited by race, gender or other demographic characteristics."	Does not "utilize recruitment or retention programs focused on particular demographic groups"; advancement based on "skills, qualifications, and experience."
Employee training materials	Removed references to "diversity, equity and inclusion" from employee training materials.	Eliminated optional inclusive-leadership training and references to diversity and inclusion in messaging.
Employee / business resource groups	ERGs remain open to all; no distinctions by protected characteristic; membership not a factor in advancement.	BRGs remain open to all; no distinctions by protected characteristic; membership not a factor in employment decisions.
Recognition surveys	"Ceasing participation in recognition surveys focused on protected characteristics."	"No longer participates in recognition surveys based on protected characteristics."
Public-facing messaging & websites	Removed its "Diversity and Inclusion" website and DEI references from company websites and recruitment materials.	Eliminated references to diversity and inclusion in internal and external messaging; the Public Interest Statement does not mention "diversity" once.
Stated legal rationale	Cited the Supreme Court, the President's Executive Orders, and the March 2025 EEOC/DOJ guidance.	Cited recent Supreme Court decisions and the same March 2025 EEOC/DOJ guidance.

The letters are strikingly similar. Both companies eliminated the internal function responsible for equal opportunity, abandoned workforce-diversity and representation goals, ended demographic-focused recruitment, and stripped diversity content from training and public-facing materials. In places the two letters are close to verbatim: Verizon committed to "ceasing participation in recognition surveys focused on protected characteristics," and Charter stated that it "no longer participates in recognition surveys based on protected characteristics."[15] The predicate fact that led

[15] Verizon FCC Letter; Charter FCC Letter.

the Commission to impose conditions in Verizon-Frontier—an acquirer dismantling its equal-opportunity infrastructure under federal pressure—is therefore present here in the same form.

C. Charter cannot claim a stronger equal-opportunity record, because it has disclaimed that record.

Charter might be expected to argue that, whatever Verizon did, Charter's own record is strong enough to make conditions unnecessary. That argument is not available to Charter, because Charter has affirmatively disowned the record that would support it. Charter once maintained one of the more developed equal-opportunity programs in the industry—a decade-long commitment, a Chief Diversity Officer with genuine authority, an External Diversity Council and an Executive Steering Committee, workforce-diversity targets, and the binding diversity commitments it made to this Commission as conditions of its 2016 acquisition of Time Warner Cable and Bright House Networks.[16] Charter has now repudiated all of it. Its letter to the FCC states that its former Chief Diversity Officer "no longer advances diversity and inclusion priorities," that it "does not maintain workforce diversity targets" and does not use "recruitment or retention programs focused on particular demographic groups," and that it has ended its External Diversity Council and Executive Steering Committee.[17] Its Public Interest Statement to the FCC does not mention "diversity" once, and its public diversity-and-inclusion webpages have been emptied of content.[18]

Charter may respond that it reaffirmed its commitment to "equal employment opportunity" and continues to invest in its workforce through apprenticeships and education benefits.[19] But reaffirming equal opportunity in name, while removing the roles, audits, and monitoring that give the commitment operational effect, is precisely the gap these conditions address. The conditions NIWR proposes are the mechanisms by which an employer detects and corrects discrimination; they are the substance behind the very equal-opportunity commitment Charter says it retains.

The consequence is that Charter has foreclosed the very distinction it might otherwise draw. A company cannot tell the FCC that it has dismantled its equal-opportunity infrastructure and, in the

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[16] *See* Commission decision approving Charter's 2016 acquisition of Time Warner Cable and Bright House Networks (D.16-05-007).
[17] Charter FCC Letter at 2.
[18] *See* Public Interest Statement (containing no reference to "diversity").
[19] *See* Charter FCC Letter at 2 (describing the Broadband Field Tech Apprenticeship, self-progression, and education-benefit programs).

same season, tell this Commission that its equal-opportunity infrastructure is robust enough to make conditions unnecessary. Whatever daylight might once have separated Charter's record from Verizon's, Charter has erased it by its own hand. There is thus no principled basis on which to treat the workers employed by Charter and Cox as entitled to less protection than the Commission afforded Verizon's workers.

D. The Commission should follow Verizon-Frontier or explain its departure.

The principle is the same throughout administrative law: an agency has a "duty to explain its departure from prior norms," and the ground for departure "must be clearly set forth so that the reviewing court may understand the basis of the agency's action."[20] Section 1705 supplies the enforcement mechanism: findings must let a reviewing court "determine whether [the Commission] acted arbitrarily" and "assist others planning activities involving similar questions."[21] Parties and the public are entitled to know whether the workforce-equity standard announced in Verizon-Frontier is the Commission's standard, or was unique to Verizon and why.

NIWR does not contend the Commission is powerless to distinguish Verizon-Frontier. It contends only that, if the Commission intends to hold Charter's prospective and current workers to a lesser standard, it must identify the distinction and support it with findings. On this record—two transactions governed by the same statute, measured against the same ESJ Action Plan, and documented by two nearly identical letters renouncing equal opportunity—we believe no such distinction is available. The straightforward course, and the one that avoids any question of an unexplained departure, is to include the strengthened and added conditions in the final decision.

V. CONCLUSION

WHEREFORE, NIWR respectfully requests that the Commission amend the final decision—whether based on the Proposed Decision or the Alternate Proposed Decision—to include a mandatory recruitment pipeline, disaggregated compensation-and-promotion reporting, and belonging-and-inclusion employee survey questions as set forth in Part III and Appendix A, or explain why the Verizon-Frontier standard does not apply. NIWR's requested changes will not delay the schedule or broaden the scope of the proceeding.

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[20] *Atchison, T. & S.F. Ry. Co. v. Wichita Bd. of Trade*, 412 U.S. 800, 808 (1973).
[21] *Cal. Mfrs. Ass'n v. Pub. Utils. Comm'n*, 24 Cal.3d 251, 258–259 (1979) (citing Public Utilities Code §1705).

Respectfully submitted,

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APPENDIX A

PROPOSED REVISIONS TO THE FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDERING PARAGRAPHS[22]

(Underline indicates addition; strikethrough indicates removal.)

Proposed Findings of Fact (additions)

1. Charter and Cox together employ thousands of workers in California, including significant numbers of Latino and other workers of color.

2. The Joint Applicants did not demonstrate that the Transfer will be fair and reasonable to affected employees within the meaning of Section 854(c)(4).

3. Charter has reassigned its Chief Diversity Officer and disbanded the internal bodies previously responsible for promoting equal opportunity, reducing its organizational capacity to detect and correct practices that lead to employment discrimination.

4. Charter's recent California layoffs, including 452 positions in Ontario, fell disproportionately on ESJ communities.

5. In Decision 26-01-023, the Commission imposed workforce-equity conditions on a similarly situated acquirer (Verizon), including a recruitment pipeline (OP 6), employee belonging-and-inclusion surveys (OP 9), and an annual report monitoring the workforce effects of the changes described in the acquirer's letter to the FCC (OP 10).

6. Charter made strikingly similar representations to FCC Chair Brendan Carr as Verizon did about changes to their approach to equal opportunity.

Proposed Conclusions of Law (additions)

1. Section 854(c)(4) requires an affirmative finding that the Transfer is fair and reasonable to affected employees as a condition of the public-interest determination.

2. Consistent with Decision 26-01-023 and in light of the similar letters to the FCC by Verizon and Charter, the Commission should follow the workforce-equity standard established in Verizon-Frontier.

[22] These proposed revisions are written to be applied to the Proposed Decision, but they could just as easily be incorporated into the Alternate Proposed Decision.

3. The conditions set forth below are consistent with the EEOC and Department of Justice guidance the Joint Applicants cite and California law; they do not require preferential treatment on the basis of any protected characteristic.

Proposed Revised and Additional Conclusions of Law:

Conclusion of Law 17 (recruitment pipeline), as revised:

17. It is reasonable to require the post-merger company to provide a Broadband Field Technician Apprenticeship Program for hiring California technicians to promote high road career paths and economic opportunities. The post-merger company shall submit an update, detailing its program and progress via its March 1, 2027, Annual Report to the Commission, and annually thereafter. The post-merger company ~~may~~ shall ~~consider~~ partner~~ship~~ with the California State University System or the California Communication Colleges. To promote high road career paths and economic opportunities in ESJ communities, the post-merger company shall~~ould~~ make additional effort to search for candidates within the ESJ and Tribal communities in its footprint. Additionally, the post-merger company will provide opportunity to participate in workforce development programs via University of California Native American Opportunity Plan.

Conclusion of Law 18 (workforce reporting), as revised:

18. It is reasonable to require the post-merger company to include an annual report detailing its success in incorporating candidates from ESJ communities, including ESJ hiring data, hiring outreach methods, changes, and updates, for ten (10) years starting with the March 1, 2027, Annual Compliance Report to the Commission. It is reasonable to require that the report include hiring, compensation, and promotion outcomes for its California workforce, disaggregated by race, ethnicity, and gender, including median pay by role level, promotion rates, and year-over-year trends. The report shall also monitor and describe the effects on the workforce of the changes the post-merger company announced in its February 26, 2026 letter to the Federal Communications Commission, and shall be served on the Public Advocates Office, and any other party the Commission designates.

New Conclusion of Law (Belonging and Inclusion Surveys):

It is reasonable to require the post-merger company to include in employee satisfaction surveys questions on employees' experiences and satisfaction in regard to belonging and inclusion, in addition to satisfaction with career advancement opportunities, compensation, work-life balance, and company culture. The surveys shall allow employees to self-identify based on characteristics including gender, race, disability status, veteran status, and Lesbian, Gay, Bisexual, and Transgender identity, and the results shall be reported to the Commission in the post-merger company's Annual Compliance Report.

Proposed Revised and Additional Ordering Paragraphs

Ordering Paragraph 16 (recruitment pipeline), as revised:

16. The post-merger company shall provide a Broadband Field Technician Apprenticeship Program for hiring California technicians to promote high road career paths and economic opportunities. The post-merger company shall submit an update, detailing its program and progress via its March 1, 2027, Annual Report to the Commission, and annually thereafter. The post-merger company ~~may consider partnership with~~ shall establish a recruiting pipeline from the California State University System ~~or~~and the California Community Colleges, aiming to recruit from underrepresented populations in consultation with the Commission's ESJ Working Group. To promote high road career paths and economic opportunities in Environmental and Social Justice (ESJ) communities, the post-merger company ~~should make additional effort to search for~~shall conduct targeted outreach to recruit candidates within the ESJ and Tribal communities in its footprint, including communities disproportionately affected by the post-merger company's recent California layoffs. Additionally, the post-merger company shall provide opportunity to participate in workforce development programs via University of California Native American Opportunity Plan.

Ordering Paragraph 17 (workforce reporting), as revised:

17. The post-merger company shall include an annual report detailing its success in incorporating candidates from Environmental and Social Justice (ESJ) communities, including ESJ hiring data, hiring outreach methods, changes, and updates. The report shall include hiring, compensation, and promotion outcomes for its California workforce,

disaggregated by race, ethnicity, and gender, including median pay by role level, promotion rates, and year-over-year trends. The report shall also monitor and describe the effects on the workforce of the changes the post-merger company announced in its February 26, 2026 letter to the Federal Communications Commission, and shall be served on the Public Advocates Office, and any other party the Commission designates. This report shall be provided for ten (10) years starting with the March 1, 2027, Annual Compliance Report to the Commission.

New Ordering Paragraph (Belonging and Inclusion Surveys):

For a period of five years after the effective date of this decision, the post-merger company shall conduct employee satisfaction surveys that include questions on employees' experiences and satisfaction in regard to belonging and inclusion, in addition to satisfaction with career advancement opportunities, compensation, work-life balance, and company culture. The surveys shall allow employees to self-identify based on characteristics including gender, race, disability status, veteran status, and Lesbian, Gay, Bisexual, and Transgender identity, and the results shall be reported to the Commission in the post-merger company's Annual Compliance Report.