

FIELD CONTACTS WITH LOCAL, STATE OR FEDERAL GOVERNMENTAL AGENCIES OR BODIES

1. GENERAL

1.01 This section outlines the procedures to follow in connection with visits to our premises by representatives of local, state or federal governmental agencies or bodies, such as the Federal Communications Commission, the state Board of Equalization, the Public Utilities Commission, The California Highway Patrol, the California Bureau of Consumer Affairs, the Air Resources Board, the U.S. Dept. of Labor (Occupational Safety and Health Act (OSHA) Compliance officers), and others.

1.02 It is reissued to change titles and to conform with the Company reorganization plan.

1.03 Representatives may wish to talk to either management or non-management employees. They may want to:

- (a) Obtain information by questioning employees.
- (b) Investigate or review records.
- (c) Inspect or test equipment.
- (d) Conduct safety inspections.

Note: If the information requested concerns the name, telephone number, or address of a non-published service, tell the representative and refer him to the Chief Special Agent's office (giving him the number to call).

2. PROPER IDENTIFICATION

2.01 Anyone representing himself as an official of any of the above bodies and requesting information or permission to review records must identify himself.

2.02 If any such person does not have satisfactory identification, have a supervisor contact the

General Department Supervisor for instructions. All special security measures which are in effect must be observed.

3. INFORMATION TO BE FURNISHED

3.01 After obtaining the representative's identification, courteously furnish whatever assistance is required.

3.02 Unless there is a conflict with the "Secrecy of Communications" instructions (See S.I. 24) the employee should answer pertinent questions and permit an inspection of records and/or equipment related to the government representative's area of authority. If the representative requests information outside his area of authority which may be contrary to the Company's proprietary interests, the responsible supervisor or staff person should be consulted for assistance or advice. (See S.I. 178.)

3.03 Except for the above, no information requested should be withheld, and employees should be perfectly frank; however, information not specifically requested should not be volunteered, and no definite replies should be made if the employee is not certain that the information he furnishes is correct and complete.

3.04 If the representative requests copies of written material, such as a practice, report, a study or service results data, refer him to the office of the Assistance Vice President, Area Operations. That office is responsible for furnishing all written material to the various agencies.

4. REPORT OF VISITS BY PUC OR OTHER GOVERNMENT AGENCIES, EXCEPT FCC AND OSHA COMPLIANCE OFFICERS

4.01 Management must know of all such visits. As soon as possible, during the visit or immediately thereafter, notify the appropriate Division

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Manager by telephone through lines of organization, giving the following information:

- (a) The name of the individual. (If accompanied by Company management representatives, give this information also.)
- (b) The name of the organization he represents.
- (c) The information requested.
- (d) The date, time, and duration of visit.
- (e) Any other pertinent information.

4.02 As soon as possible, prepare a memorandum to confirm the verbal report. Include the information given in the telephone call, as well as any subsequent information available. Have the memorandum signed by the employee who was contacted. Make six copies.

4.03 Send three copies directly to the General Department Supervisor, who forwards two copies to the Assistant Vice President, Area Operations. The Assistant Vice President will notify General Administration in San Francisco if the nature of the visit and information given warrants this action.

4.04 Send one copy each to the appropriate Division and District Managers involved and retain one copy for file.

5. REPORTS OF VISIT BY THE FCC

5.01 Visit by FCC personnel to inspect equipment or records must be made to our radio stations at any reasonable hour. They are authorized to monitor radio circuits or check our records. Our radio station records must be made available to them upon request.

5.02 When an FCC visit is made to any location, the immediate supervisor shall notify the FCC Compliance Coordinator by telephone as soon as possible (during the visit or immediately thereafter), who in turn notifies the FCC Compliance Specialist. If the Compliance Coordinator or his supervisor is not available, notify the FCC Compliance Specialist. Include in this report:

- (a) The name and title of the FCC inspector.

- (b) The equipment or service inspected.
- (c) Any discrepancies noted or suggestions made by the inspector.
- (d) Other pertinent information.

5.03 The FCC Compliance Coordinator and the Compliance Specialist will notify the appropriate coordinate in General Administration and give the details of the report.

5.04 The supervisor making the report must immediately prepare a letter to his Division Manager confirming the report. He will send copies of this letter to the FCC Compliance Specialist and the FCC Compliance Coordinator.

5.05 The Division Manager (Plant Manager, Nevada) will send copies of the letter to each of the following:

- (a) Department Manager, Network Operations (Engineering Manager — Nevada)
- (b) Director — Network Operations Methods — G.A., San Francisco.
- (c) Engineering Staff Director, — Program Administration — G.A., San Francisco.

6. OSHA INSPECTIONS

6.01 At any time, OSHA Compliance Officers may make inspections of building, facility or job locations and usually arrive without prior notification. Visits are generated by an employee complaint, OSHA inspection schedules, or by an incident involving a serious injury or fatality.

6.02 The Compliance Officer will present his credentials and then ask to see the person in charge. He will also ask to see representatives of any union-represented groups involved, and offer them the opportunity to participate in the "walk around" inspection

6.03 The building or departmental district Log of Occupational Injuries and Illnesses (OSHA Form 100) shall be made readily available for the Compliance Officer's inspection.

6.04 Visits by OSHA Compliance Officers must be reported immediately by telephone, to the

Regional OSHA Coordinator who will inform the Staff Manager — Safety, General Administration, San Francisco.

6.05 Immediately following the visit, the management person who accompanied the Compliance Officer during the walk around inspection and

participated in the closing conference shall prepare a memorandum outlining these events and forward the memorandum to the Regional OSHA Coordinator. The Regional OSHA Coordinator shall forward a copy of the memorandum to the Staff Manager — Safety, General Administration, San Francisco.