



## Volume 5 Subcontracting

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**Abbreviation and Acronym Definitions List**

COOP	Continuity of Operations
ERP	Enterprise Resource Planning
eSRS	Electronic Subcontracting Reporting System
IT	Information Technology
MPSDC	Mountain Plains Supplier Development Council
NAICS	North American Industry Classification System
PMO	Program Management Office
SAM	System for Award Management
SB	Small Business
SDB	Small Disadvantaged Business
SDVOSB	Service-Disabled Veteran-Owned Small Business
SSR	Summary Subcontract Report
VOSB	Veteran Owned Small Business
WOSB	Women-Owned Small Business

**Assumptions and Conditions**

Lumen has no Assumptions or Conditions for Volume 5 at this time.


**VOLUME 5 SUBCONTRACTING [L.33, M.2.4]**






The Subcontracting Plan represents an INDIVIDUAL PLAN, meaning all elements are developed specifically for this contract and are applicable for the full term of this contract in accordance with FAR 52.219-9, “Small Business Subcontracting Plan.” Total estimated contract price is To Be Negotiated (TBN) at contract award.

Lumen establishes subcontracting goals by looking first at the specific solicitation subcontracting requirements. Lumen then reviews the services and materials to be provided under the solicitation and develops a best-estimate of the potential subcontracting activity for that specific solicitation. The determination of a need to subcontract, or to even set aside specific work or potential subcontracting opportunities, and the actual subcontractor selections are based on the specific requirements of the solicitation. Lumen’s corporate commitment to support the active participation of SB/SDB/WOB/HUBZone/SDV/VO concerns is always part of this process. Lumen reviews the requirements and then determines what activities can or will be subcontracted and what type of business concerns. (SB/SDB/WOB/HUBZone/SDV/VO) are needed to fulfill these requirements. In some instances specific subcontractors are identified, with the use of various source lists; in other instances, competitive analyses and/or procurements are conducted. The above methods were used to develop the goals provided in this Plan.

In keeping with our management approach and commitment to best value to support EIS’ critical business and Government needs, Lumen has assembled an agile, focused, and very capable team with proven experience to partner with GSA and successfully deliver to each customer mission (**Figure 1-1**). Our Team members, encompassing both small and large businesses, supplement our network coverage with terrestrial or wireless/satellite services, equipment, systems, and support solutions.

**Figure 1-1. The Lumen Team’s Capabilities**

TEAMMATE	TEAM CAPABILITIES
	Proven Federal partner with 10 years incumbency supporting GSA’s Network Enterprise, WITS 3, and multiple Local Service Agreements (LSA) Over 300 of Government entities depend on Lumen to design build and manage complex

TEAMMATE	TEAM CAPABILITIES
Prime Contractor	global networks and IT infrastructures. Our low-latency private, public and hybrid connectivity options help securely move voice, video and data around the world Metrics-driven, systematic continuous process improvements
 Subcontractor	Solutions designed to meet the unique needs of the distributed agency Enabling high-capacity access to high-availability networks; from managed security to managed Wi-Fi Cost-effectively serving constituents, employees, streamlining operations, and maintaining continuity of operations (COOP)
 Subcontractor	Providing over 50 years of information technology (IT), systems engineering, professional services and simulation and training to more than 1,000 customers in the DoD and Federal Government. Leading provider of Multi-Channel Contact Center customer support to the Federal Government
 Subcontractor Service-Disabled Veteran-Owned Small Business	Comprehensive systems engineering and management expertise for classified and unclassified Government networks Satellite solutions include strategic and tactical satellite services, including design, integration, installation, operations, maintenance, and training
 Subcontractor	Telephony/Voice Managed Services Cisco Systems Authorized Technology Provider with deep technical expertise in the entire Cisco portfolio
 Subcontractor	Award winning small enterprise Hosted Voice Services Top Hosted VoIP Provider for the last five years (Infonetix Research), and Industry leader in Unified Communications (Gartner)
Cloud Services	Lumen along with select partners delivering Collocation, CDN, IaaS, PaaS, and SaaS capabilities helping to reduce the overall Federal environment footprint Lumen has relationships with companies such as GDIT, Day 1, JHC, and Ciracom

**1.0 SUBCONTRACTING PLAN AND SUBCONTRACTING PARTICIPATION [L.33.1, M.2.4 (1)]**

**1.1 Subcontracting Plan Submission**

As a large business, Lumen is submitting an individual subcontracting plan, specific to the EIS procurement, in accordance with the instructions contained in Section L.33.1 of the EIS solicitation as well as FAR 52.219-9, 19.704. 552.219-72 and 552.219-73. Minimum subcontracting goals are included as required by Table L.33.1.3 of the solicitation. Lumen understands that this plan, part of our proposal submission, is

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subject to negotiation by the GSA Contracting Officer and will be made a part of any resultant contract award.

### **1.1.1 Requirements Compliance**

Lumen's EIS Subcontracting Plan complies with the requirements of 15 U.S.C 637 d(8) and FAR Subpart 19.7. We have used GSA's model subcontracting plan, RFP Section J.20, as the basis to create our plan that shows our commitment to ensuring that minority and disadvantaged businesses are given every opportunity available to participate in those tasks for which Lumen identifies areas of work that can be performed by a subcontractor.

### **1.1.2 Commitment and Capability Demonstration**

Using GSA's model subcontracting plan as a guide, Lumen has developed this subcontracting plan in consonance with our Corporate Supplier Diversity Program. Suppliers play a critical role in supporting Lumen's efforts to consistently and effectively deliver next-generation, scalable solutions. We seek to purchase goods and services that meet total value, business requirements from small business, veteran-owned small business, service disabled veteran-owned small business, HUBZone small business, small disadvantaged business and women-owned small business concerns. Lumen believes in fair and non-discriminatory treatment of all suppliers. Our supplier diversity program maintains an active page on our company website to encourage new suppliers to join our constantly growing list of qualified vendors that are vetted and available to participate in bid opportunities throughout the company.

### **1.1.3 Strategies Used on Previous Contracts**

The Subcontracting Plan represents an INDIVIDUAL PLAN, meaning all elements are developed specifically for this contract and are applicable for the full term of this contract in accordance with FAR 52.219-9, "Small Business Subcontracting Plan."

The goals identified in this Plan reflect the overall program strategy used on previous contracts and requirements for work during the transition and steady-state phases of the contract. Security services, design and engineering services, field

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services, equipment procurement, and telecommunications services and support provide opportunities for Lumen subcontractor participation. Requirements in network security and enhanced services engineering as well as task order special projects that require level-of-effort support are other targeted areas. The decision to purchase supplies and services purchased from SBs will be based on cost, availability of SB to provide the item, and the ability of an SB to ensure the quality of its service.

Local loop access services will be procured under master agreements with large business network telecom providers. These agreements are not considered as subcontracting under this proposal. Additionally, the intended efforts of Lumen to enhance participation are described in this Plan.

Lumen establishes subcontracting goals by looking first at the specific solicitation subcontracting requirements. Lumen then reviews the services and materials to be provided under the solicitation and develops a best-estimate of the potential subcontracting activity for that specific solicitation. The determination of a need to subcontract, or to even set aside specific work or potential subcontracting opportunities, and the actual subcontractor selections are based on the specific requirements of the solicitation. Lumen's corporate commitment to support the active participation of SB/SDB/WOB/HUBZone/SDV/VO concerns is always part of this process. Lumen reviews the requirements and then determines what activities can or will be subcontracted and what type of business concerns. (SB/SDB/WOB/HUBZone/SDV/VO) are needed to fulfill these requirements. In some instances specific subcontractors are identified, with the use of various source lists; in other instances, competitive analyses and/or procurements are conducted. The above methods were used to develop the goals provided in this Plan.

### **Determination of Capabilities and Fit**

To determine the capability and fit of any potential subcontractor, Lumen reviews the company's corporate qualifications and past performance and examines any prior



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experience of Lumen with the subcontractor. Lumen also runs Dun & Bradstreet reports on potential subcontractors and reviews vendor rating data on hand.

### **Methods Used to Identify Potential Sources**

Lumen has several methods of identifying potential sources of subcontractors. A list of businesses is developed using vendor databases from various Lumen business units, as well as SB/HZSB/SDB/WOSB/SDVOSB/VOSB lists maintained in the Lumen Purchasing Department files. Past performance on and participation in other Lumen programs is examined to identify relevant capabilities plus:

- Lumen personnel participate in and/or attend trade shows and conferences to identify SB/HZSB/SDB/WOSB/SDVOSB/VOSB companies. Lists of contractors are used to identify companies with relevant experience in addition to lists of SBs used by Federal Government agencies over the past five years.
- Lumen will coordinate the utilization of SB/SDB/WOB/HUBZone/SDV/VO companies under this Subcontracting Plan from sources developed through the Small Business Liaison Officer (SBLO) for this Plan, SBLOs for the various Lumen business units, contract managers, buyers, procurement and the Lumen technical community. Further, as part of our commitment to provide subcontracting opportunities for SB/SDB/WOB/HUBZone/SDV/VO concerns, Lumen will take the following steps:
- Request, when appropriate, the assistance of the organizations listed below and access their publicly available databases to establish source lists for:
  - **SB/SDB/WOB/HUBZone/SDV/VO organizations:**
    - American Business Women Association
    - Asian Businessmen's Association
    - Black Business Association
    - Directory of Certified Minority Business Enterprises
    - Latin Business Association

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- Local/Regional Economic Development Agencies
  - Minority Business Development Agency
  - National Association of Minority Contractors
  - National Minority Business Associations
  - National Minority Purchasing Council
  - National Minority Supplier Development
  - Professional Services Council
  - Small Business Administration
  - United Indian Development Association
  - US Hispanic Chamber of Commerce
  - US Pan Asian-American Chamber of Commerce
  - Various Federal Offices of Small and Small Disadvantaged Business Utilization
  - Various Minority Chambers of Commerce
  - US and Local Chambers of Commerce
  - Minority Business Development Agency
  - Alaskan Native Business Council
- Collect and disseminate information, brochures, and catalogs received from SB/SDB/WOB/HUBZone/SDV/VO businesses looking for subcontracting opportunities. Any such information is kept on file by the SBLO, individual buyers, and/or the operating units. Maintain an ongoing list of SB/SDB/WOB/HUBZone/SDV/VO concerns that have provided satisfactory services or products to Lumen in the past.

As a continuous effort to meet our Supplier Diversity goals, Lumen analyzes its spending on a quarterly and annual basis to identify trends and potential gaps year over year within each diverse classification. Where gaps develop between prior fiscal year spend and current fiscal year spend goals, Lumen works to identify the appropriate means and methods to drive business to the diverse supplier business subcategory.

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These strategies have been successfully used on previous contracts including GSA Networx Enterprise, GSA WITS3 and GSA Schedule 70.

In accordance with clause 52.219-9(d)(11)(e), in order to effectively implement this plan to the extent consistent with efficient contract performance, and utilizing previously used small business subcontracting strategies, Lumen performs the following functions:

1. Assist SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns. Where the Contractor's lists of potential SB, VOSB, SDVOSB, HUBZone, SDB and WOSB subcontractors are excessively long, reasonable effort shall be made to give all such small business concerns an opportunity to compete over a period of time.
2. Provide adequate and timely consideration of the potentialities of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns in all "make-or-buy" decisions.
3. Counsel and discuss subcontracting opportunities with representatives of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB firms.
4. Confirm that a subcontractor representing itself as a HUBZone small business concern is identified as a certified HUBZone small business concern by accessing the System for Award Management (SAM) database or by contacting SBA.
5. Provide notice to subcontractors concerning penalties and remedies for misrepresentations of business status as SB, VOSB, SDVOSB, HUBZone, SDB and WOSB for the purpose of obtaining a subcontract that is to be included as part or all of a goal contained in the Contractor's subcontracting plan.
6. Develop and promote company/division policy statements that demonstrate the company's/division's support for awarding contracts and subcontracts to SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns.

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7. Develop and maintain bidders' lists of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns from all possible sources.
  8. Ensure periodic rotation of potential subcontractors on bidders' lists.
  9. Ensure that SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns are included on the bidders' list for every subcontract solicitation for products and services they are capable of providing.
  10. Ensure that subcontract procurement "packages" are designed to permit the maximum possible participation of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns.
  11. Review subcontract solicitations to remove statements, clauses, etc., which might tend to restrict or prohibit SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns.
  12. Ensure that the subcontract bid proposal review board documents its reasons for not selecting any low bids submitted by SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns.
  13. Oversee the establishment and maintenance of contract and subcontract award records.
  14. Attend or arrange for the attendance of company counselors at Business Opportunity Workshops, Minority Business Enterprise Seminars, Trade Fairs, etc.
  15. Directly or indirectly counsel SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns on subcontracting opportunities and how to prepare bids to the company.
  16. Conduct or arrange training for purchasing personnel regarding the intent and impact of Section 8(d) of the Small Business Act on purchasing procedures.
  17. Develop and maintain an incentive program for buyers that support the subcontracting program.
  18. Monitor the company's performance and make any adjustments necessary to achieve the subcontract plan goals.

19. Prepare and submit timely reports.
20. Coordinate the company's activities during compliance reviews by Federal agencies.

**2.0 SUBCONTRACTING PLAN [L.33.1]**

**2.1 Identification Data**

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

**2.2 Type Of Plan**

This Subcontracting Plan represents an INDIVIDUAL PLAN, meaning all elements are developed specifically for this contract and are applicable for the full term of this contract.

**2.3 Goals**

The goals identified in this Plan reflect the overall program strategy used on requirements for work during the transition and steady-state phases of the contract. Security services, design and engineering services, field services, equipment procurement, and telecommunications services and support provide opportunities for Lumen subcontractor participation. Requirements in network security and enhanced services engineering as well as task order special projects that require level-of-effort support are other targeted areas. The decision to purchase supplies and services from small businesses will be based on cost, availability of small business to provide the item, and the ability of a small business to ensure the quality of its service.

Lumen’s goals for the Subcontracting Plan are in compliance with requirements of FAR Subparts 52.219-9 and 19.704. 52.219-9(d) (1) and 19.704(a) (1) which requires separate goals be expressed in terms of total planned subcontracting dollars. The goals are provided in total planned subcontracting dollars for the base or for any of the

options. We acknowledge and comply with the EIS target goals found in solicitation table L.33.1.3.

Lumen provides the following separate dollar and percentage goals, which are a percentage of the total subcontracting dollars for each business category as shown in the tables below in Figures 2.3-1 through 2.3-3 for the base period and all option periods:

**Figure 2.3-1 Base Award Period**

[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**Figure 2.3-2 Option Period One**

[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**Figure 2.3-3 Option Period Two**

[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

The principal types of supplies and/or services that Lumen anticipates to be subcontracted and the identification of the type of business concern planned are as follows:

BUSINESS CATEGORY OR SIZE							
Source							
Supplies/Services	Large	Small	VOSB	SDVOSB	HUBZone	SDB	WOSB
Telecommunication Services	†						†
Design & Engineering Services	†	†	†	†		†	†
Professional Services	†	†	†	†		†	†
Field Services	†	†	†	†	†	†	†
Equipment	†	†			†	†	†

**METHODS USED TO DEVELOP SUBCONTRACTING GOALS AND ESTABLISH SUBCONTRACTORS**

Lumen establishes subcontracting goals by looking first at the specific solicitation subcontracting requirements. Lumen then reviews the services and materials to be provided under the solicitation and develops a best-estimate of the potential subcontracting activity for that specific solicitation. The determination of a need to subcontract, or to even set aside specific work or potential subcontracting opportunities, and the actual subcontractor selections are based on the specific requirements of the solicitation. Lumen’s corporate commitment to support the active participation of SB/ SDB/ WOB/ HUBZone/ SDV/ VO concerns is always part of this process. Lumen reviews the requirements and then determines what activities can or will be subcontracted and what type of business concerns (SB/ SDB/ WOB/ HUBZone/ SDV/



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VO) are needed to fulfill these requirements. In some instances specific subcontractors are identified, with the use of various source lists; in other instances, competitive analyses and/or procurements are conducted. The above methods were used to develop the goals provided in this Plan.

The goals identified in this Plan reflect the overall program strategy and requirements for work during the transition and steady-state phases of the contract. The decision to purchase supplies and services purchased from SBs will be based on cost, availability of SB to provide the item, and the ability of an SB to ensure the quality of its service.

Local loop access services will be procured under master agreements with large business network telecom providers. These agreements are not considered as subcontracting under this plan.

To determine the capability and fit of any potential subcontractor, Lumen reviews the company's corporate qualifications and past performance and examines any prior experience of Lumen with the subcontractor. Lumen also runs Dun & Bradstreet reports on potential subcontractors and reviews vendor rating data on hand.

Lumen identifies potential subcontractors using the following source lists and organizations:

- a) Alaskan Native Business Council
- b) American Business Women Association
- c) Asian Businessmen's Association
- d) Black Business Association
- e) Directory of Certified Minority Business Enterprises
- f) Latin Business Association
- g) Local/Regional Economic Development Agencies
- h) Minority Business Development Agency
- i) National Association of Minority Contractors
- j) National Minority Business Associations
- k) National Minority Purchasing Council

- l) National Minority Supplier Development
- m) Professional Services Council
- n) Small Business Administration
- o) United Indian Development Association
- p) US Hispanic Chamber of Commerce
- q) US Pan Asian-American Chamber of Commerce
- r) Various Federal Offices of Small and Small Disadvantaged Business Utilization
- s) Various Minority Chambers of Commerce
- t) US and Local Chambers of Commerce

### **Indirect Costs**

Indirect costs HAVE NOT BEEN included in the dollar and percentage subcontracting goals stated above.

#### **2.4 Program Administrator**

Name: Tammy Hamdy

Position: Senior Procurement Manager

Address: 10475 Park Meadows Drive, PR1 Littleton, CO 80124-5414

Telephone: 720-387-3483

Email Address: tammy.hamdy@Level3.com

#### **Alternate POC**

Name: Seana Gilliland

Position: Vice President, Program Management Office

Address: 8281 Greensboro Drive, Suite 700, McLean, VA 22102

Telephone: 571-730-6577

Fax Number: 571-730-6550

Email Address: Seana.Gilliland@Level3.com

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**Duties**

In order to effectively implement this plan to the extent consistent with efficient contract performance, Lumen's Program Administrator will perform the following functions:

1. Assist SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns. Where the Contractor's lists of potential SB, VOSB, SDVOSB, HUBZone, SDB and WOSB subcontractors are excessively long, reasonable effort shall be made to give all such small business concerns an opportunity to compete over a period of time.
2. Provide adequate and timely consideration of the potentialities of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns in all "make-or-buy" decisions.
3. Counsel and discuss subcontracting opportunities with representatives of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB firms.
4. Confirm that a subcontractor representing itself as a HUBZone small business concern is identified as a certified HUBZone small business concern by accessing the System For Award Management (SAM) database or by contacting SBA.
5. Provide notice to subcontractors concerning penalties and remedies for misrepresentations of business status as SB, VOSB, SDVOSB, HUBZone, SDB and WOSB for the purpose of obtaining a subcontract that is to be included as part or all of a goal contained in the Contractor's subcontracting plan.
6. Develop and promote company/division policy statements that demonstrate the company's/division's support for awarding contracts and subcontracts to SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns
7. Develop and maintain bidders' lists of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns from all possible sources
8. Ensure periodic rotation of potential subcontractors on bidders' lists

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9. Ensure that SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns are included on the bidders' list for every subcontract solicitation for products and services they are capable of providing
  10. Ensure that subcontract procurement "packages" are designed to permit the maximum possible participation of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns
  11. Review subcontract solicitations to remove statements, clauses, etc., which might tend to restrict or prohibit SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns
  12. Ensure that the subcontract bid proposal review board documents its reasons for not selecting any low bids submitted by SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns
  13. Oversee the establishment and maintenance of contract and subcontract award records
  14. Attend or arrange for the attendance of company counselors at Business Opportunity Workshops, Minority Business Enterprise Seminars, Trade Fairs, etc.
  15. Directly or indirectly counsel SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns on subcontracting opportunities and how to prepare bids to the company
  16. Conduct or arrange training for purchasing personnel regarding the intent and impact of Section 8(d) of the Small Business Act on purchasing procedures
  17. Develop and maintain an incentive program for buyers that support the subcontracting program
  18. Monitor the company's performance and make any adjustments necessary to achieve the subcontract plan goals
  19. Prepare and submit timely reports
  20. Coordinate the company's activities during compliance reviews by Federal agencies

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## **2.5 Equitable Opportunity**

Lumen will make every effort to ensure that all small business concerns have an equitable opportunity to compete for subcontracts. These efforts may include one or more of the following activities:

- The Oracle system (ERP) allows us to capture Supplier Diversity spend for each vendor and the categories they list themselves as. Therefore, we can keep track of our spending with small businesses in order to meet our Federal goals.
- Lumen utilizes several source lists in determining which vendors to use, including (but not limited to): Lumen's internal database of embedded (existing) diverse subcontractors, direct solicitations from small, HUB Zone small, small disadvantaged, veteran-owned small, service-disabled veteran-owned small, and women-owned small business concerns; local chambers of commerce, business opportunity fairs and workshops, minority business enterprise seminars, trade fairs, SBA database of small businesses, DOE database of minority institutions, state databases of registered minority businesses, the North American Industry Classification System (NAICS) database, and the Women Business Enterprise National Council list.
- Assist Small/Diverse Businesses with preparations of bids, Quantities, specifications and delivery schedules so as to facilitate the participation by such concerns.
- Counsel and discuss subcontracting opportunities with representatives of small/diverse businesses. Directly and indirectly counsel small/divers concerns on subcontracting opportunities and how to prepare bids to the company.
- Develop and promote company policy statements that demonstrate the company's support for awarding contracts and subcontracts to small/diverse businesses.
- Review subcontract solicitations to remove statements, clauses, etc. which might restrict or prohibit Small/diverse concerns.

- Conduct and/or arrange training for procurement/purchasing team regarding the intent and impact of small business act on purchasing procedures.
- Monitor the company’s performance and make any adjustments necessary to achieve the subcontract plan goals.
- Pull supplier diversity spend numbers to prepare and submit timely reports.
- Require that small and diverse business concerns are included on the bidders’ list for every subcontract solicitation in excess of \$100,000 for products and services they are capable of providing.
- Outreach efforts include:
  - Corporate member of Mountain Plains Supplier Development Council (MPSDC), with ability to gain access to their comprehensive online directory of certified minority vendors listed by industry.
  - Teamed with California Public Utilities Commission to have full access to their supplier clearinghouse database to search certified diverse suppliers.

CALENDAR PERIOD	REPORT DUE	DATE DUE	SUBMIT REPORTS TO ESRS WITH EMAIL ADDRESS FOR:
10-01/03-31	SF294	4-30	Contracting Officer /SBTA
04-01/09-30	SF294	10-30	Contracting Officer
10-01/09-30	SF295	10-30	Contracting Officer/Director, Office of Small Business Development

**2.6 Assurances of Clause Inclusion and Flow Down**

Lumen agrees to include the FAR Clause 52.219-8, “Utilization of Small Business Concerns” in all subcontracts that offer further subcontracting opportunities, and will require all subcontractors (except small business concerns) that receive subcontracts in excess of \$700,000 (\$1,500,000 for construction) to adopt a plan that complies with the requirements of the clause at 52.219-9, Small Business Subcontracting Plan.

**2.7 Reporting and Cooperation**

Lumen agrees to:

1. Cooperate in any studies or surveys as may be required
2. Submit periodic reports so that the Government can determine the extent of compliance by the offeror with the subcontracting plan

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3. Submit the Individual Subcontract Report (ISR), and the Summary Subcontract Report (SSR) using the Electronic Subcontracting Reporting System (eSRS) (<http://www.esrs.gov>), following the instructions in the eSRS
  4. Ensure that its subcontractors with subcontracting plans agree to submit the ISR and/or the SSR using the eSRS
  5. Provide its prime contract number and its DUNS number and the e-mail address of the Government or Contractor official responsible for acknowledging or rejecting the reports, to all first-tier subcontractors with subcontracting plans so they can enter this information into the eSRS when submitting their reports;
  6. Require that each subcontractor with a subcontracting plan provide the prime contract number and its own DUNS number, and the e-mail address of the Government or Contractor official responsible for acknowledging or rejecting the reports, to its subcontractors with subcontracting plans

Reports are to be submitted within 30 days after the close of each calendar period.

## **2.8 Recordkeeping**

Lumen will maintain records concerning procedures that have been adopted to comply with the requirements and goals in the plan, including establishing source lists; and a description of efforts to locate SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns and award subcontracts to them. The records shall include at least the following (on a plant-wide or company-wide basis, unless otherwise indicated):

1. Source lists (e.g., SAM), guides, and other data that identify SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns.
2. Organizations contacted in an attempt to locate sources that are SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns.

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3. Records on each subcontract solicitation resulting in an award of more than \$150,000, indicating:
    - a) Whether small business concerns were solicited and, if not, why not
    - b) Whether veteran-owned small business concerns were solicited and, if not, why not
    - c) Whether service-disabled veteran-owned small business concerns were solicited and, if not, why not
    - d) Whether HUBZone small business concerns were solicited and, if not, why not
    - e) Whether small disadvantaged business concerns were solicited and, if not, why not
    - f) Whether women-owned small business concerns were solicited and, if not, why not
    - g) If applicable, the reason award was not made to a small business concern
  4. Records of any outreach efforts to contact:
    - a) Trade associations
    - b) Business development organizations
    - c) Conferences and trade fairs to locate small, HUBZone small, small disadvantaged, and women-owned small business sources
    - d) Veterans service organizations
  5. Records of internal guidance and encouragement provided to buyers through
    - a) Workshops, seminars, training, etc.
    - b) Monitoring performance to evaluate compliance with the program's requirements
  6. On a contract-by-contract basis, records to support award data submitted to the Government, including the name, address, and business size of each subcontractor
  7. Other records to support your compliance with the subcontracting plan: None



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## **2.9 Statutory Requirements**

- Any contractor receiving a contract for more than the simplified acquisition threshold must agree in the contract that SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns will have the maximum practicable opportunity to participate in contract performance consistent with its efficient performance.
- It is further the policy of the United States that its prime contractors establish procedures to ensure the timely payment of amounts due pursuant to the terms of their subcontracts with SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns.
- See 19.702(a)(1) for requirements that are imposed in negotiated acquisitions, and (a)(2) for requirements that are imposed in sealed bidding acquisitions.

As stated in [15 U.S.C. 637\(d\)\(8\)](#), any contractor or subcontractor failing to comply in good faith with the requirements of the subcontracting plan is in **material breach of its contract**. Further, [15 U.S.C. 637\(d\)\(4\)\(F\)](#) directs that a contractor's **failure to make a good faith effort** to comply with the requirements of the subcontracting plan shall result in the imposition of liquidated damages (see 19.702(c) and 19.705-7).

## **2.10 Description of Good Faith Effort**

Lumen will take the following steps to demonstrate compliance with the good faith effort in achieving small business subcontracting goals:

- Continue to meet with and identify additional SB/ SDB/ WOB/ HUBZone/ SDV/ VO businesses for potential subcontracting with Lumen
- Commit to holding quarterly meetings with our Program Team in the Program Management Office (PMO) to review our compliance with subcontracting goals and establish any corrective action plans if the goals are not being met
- Identify technical areas that can be subcontracted to SB/ SDB/ WOB/ HUBZone/ SDV/ VO concerns

- Review each task order for possibilities of subcontracting to SB/ SDB/ WOB/ HUBZone/ SDV/ VO concerns
- Actively encourage our SB/ SDB/ WOB/ HUBZone/ SDV/ VO teaming partners to seek work and tasks under other active Lumen contract vehicles
- Provide assistance to our SB/ SDB/ WOB/ HUBZone/ SDV/ VO subcontractors in responding to task order requests, proposal preparation, marketing and meeting with Government representatives
- Track the achievements of our Subcontracting Plans to determine compliance across all contracts
- Track and report the addition of any new SB/ SDB/ WOB/ HUBZone/ SDV/ VO companies to our subcontractor base

**Signatures Required**

**This Subcontracting Plan is submitted by:**

Signature: 

Typed Name: Tammy Hamdy

Company Title: Senior Procurement Manager

Date Signed: 22FEB2016

**Government Contracting Officer APPROVAL:**

Signature: \_\_\_\_\_

Typed Name: \_\_\_\_\_

Company Title: \_\_\_\_\_

Date Signed: \_\_\_\_\_

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### **3.0 SUBCONTRACTING HISTORY [L.33.2, M.2.4 (2)]**

Lumen demonstrates its ability to meet small business subcontracting goals based on the previous Government contracts. Lumen is providing its five (5) most recent ratings in PPIRS associated with meeting small business subcontracting goals, along with a description of the small business outreach efforts made towards achieving those goals. Additionally, Lumen is providing the PPIRS/CPARS reports associated with the five ratings provided. These reports are attached to this volume as Attachments 1 through 5.

#### **3.1 Program 1**

##### **PROGRAM INFORMATION**

Program Name: NETWORKX ENTERPRISE

Contract Number: GS00T07NSD0037

Prime Contract Holder: Level 3 Communications, LLC

Customer: GSA

Period of Performance Being Assessed: 2014-06-01 to 2015-05-30

Small Business Subcontracting Rating: Satisfactory (Performance meets contractual requirements)

##### **SMALL BUSINESS OUTREACH EFFORTS**

Level 3's small business outreach efforts utilizes several source lists in determining which vendors to use, including (but not limited to): Level 3's internal database of embedded (existing) diverse subcontractors, direct solicitations from small, HUB Zone small, small disadvantaged, veteran-owned small, service-disabled veteran-owned small, and women-owned small business concerns; local chambers of commerce, business opportunity fairs and workshops, minority business enterprise seminars, trade fairs, SBA database of small businesses, DOE database of minority institutions, state databases of registered minority businesses, the North American Industry Classification System (NAICS) database, and the Women Business Enterprise National Council list.

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Level 3 continued to make progress this reporting period increasing our participation for WOSB as well as VOSB and SDVOSB activities. We continue our educational activities with our procurement team, program management and sales staff on their obligation to ensure that the small business community is well represented in our bid process. Further work identifying HUBZone companies continues. By centralizing our procurement activities, we hope to grow our pool of available small businesses that can compete for work and receive awards to support Networkx taskings. We continue to push our project managers and sales to coordinate with the plan's administrator to include under-represented and under-utilized disadvantaged vendors for further progress.

### **3.2 Program 2**

#### **PROGRAM INFORMATION**

Program Name: US GENERAL SERVICES ADMINISTRATION FEDERAL SUPPLY SCHEDULE

Contract Number: GS35F0177J

Prime Contract Holder: Level 3 Communications, LLC

Customer: GSA

Period of Performance Being Assessed: 2014-01-11 to 2015-01-10

Small Business Subcontracting Rating: Satisfactory (Performance meets contractual requirements)

#### **SMALL BUSINESS OUTREACH EFFORTS**

Level 3's small business outreach efforts utilizes several source lists in determining which vendors to use, including (but not limited to): Level 3's internal database of embedded (existing) diverse subcontractors, direct solicitations from small, HUB Zone small, small disadvantaged, veteran-owned small, service-disabled veteran-owned small, and women-owned small business concerns; local chambers of commerce, business opportunity fairs and workshops, minority business enterprise seminars, trade fairs, SBA database of small businesses, DOE database of minority

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institutions, state databases of registered minority businesses, the NAICS database, and the Women Business Enterprise National Council list.

Our training continues for our sales staff and procurement team on the requirement to utilize socio-economically disadvantaged businesses on a regular basis. Additional outreach efforts to the SBA seeking help in finding HUBZone qualified companies continues. We have taken steps to move all procurement/subcontracting activity to a centralized organization and anticipate finding additional vendors who can successfully compete for work under this contract as new opportunities arise.

### **3.3 Program 3**

#### **PROGRAM INFORMATION**

Program Name: CONUS DARK FIBER COMMERCIAL FACILITIES AND OLA INSTALLATION

Contract Number: HC104712D0002

Prime Contract Holder: Level 3 Communications, LLC

Customer: DISA

Period of Performance Being Assessed: 2013-12-31 to 2014-12-30

Small Business Subcontracting Rating: Satisfactory (Performance meets contractual requirements)

#### **SMALL BUSINESS OUTREACH EFFORTS**

Level 3's small business outreach efforts utilizes several source lists in determining which vendors to use, including (but not limited to): Level 3's internal database of embedded (existing) diverse subcontractors, direct solicitations from small, HUB Zone small, small disadvantaged, veteran-owned small, service-disabled veteran-owned small, and women-owned small business concerns; local chambers of commerce, business opportunity fairs and workshops, minority business enterprise seminars, trade fairs, SBA database of small businesses, DOE database of minority institutions, state databases of registered minority businesses, the NAICS database, and the Women Business Enterprise National Council list.

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Our training continues for our sales staff and procurement team on the requirement to utilize socio-economically disadvantaged businesses on a regular basis. Additional outreach efforts to the SBA seeking help in finding HUBZone qualified companies continues. We have taken steps to move all procurement/subcontracting activity to a centralized organization and anticipate finding additional vendors who can successfully compete for work under this contract as new opportunities arise.

### **3.4 Program 4**

#### **PROGRAM INFORMATION**

Program Name: WITS 3

Contract Number: GS11T08BJD6002

Prime Contract Holder: Level 3 Communications, LLC

Customer: GSA

Period of Performance Being Assessed: 2014-11-08 to 2015-11-07

Small Business Subcontracting Rating: Very Good (Performance meets contractual requirements and exceeds some to the Government's benefit)

#### **SMALL BUSINESS OUTREACH EFFORTS**

Level 3's small business outreach efforts utilizes several source lists in determining which vendors to use, including (but not limited to): Level 3's internal database of embedded (existing) diverse subcontractors, direct solicitations from small, HUB Zone small, small disadvantaged, veteran-owned small, service-disabled veteran-owned small, and women-owned small business concerns; local chambers of commerce, business opportunity fairs and workshops, minority business enterprise seminars, trade fairs, SBA database of small businesses, DOE database of minority institutions, state databases of registered minority businesses, the NAICS database, and the Women Business Enterprise National Council list.

Our training continues for our sales staff and procurement team on the requirement to utilize socio-economically disadvantaged businesses on a regular basis. Additional outreach efforts to the SBA seeking help in finding HUBZone qualified companies continues. We have taken steps to move all procurement/subcontracting

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activity to a centralized organization and anticipate finding additional vendors who can successfully compete for work under the WITS 3 contract as new opportunities arise.

### **3.5 Program 5**

#### **PROGRAM INFORMATION**

Program Name: WITS 3

Contract Number: GSA11T08BJD6002

Prime Contract Holder: Level 3 Communications, LLC

Customer: GSA/FAS/ITC

Period of Performance Being Assessed: 2015-11-08 to 2016-11-07

Small Business Subcontracting Rating: Exceptional (Performance meets and exceeded some of GSA's subcontracting goals)

#### **SMALL BUSINESS OUTREACH EFFORTS**

Level 3's small business outreach efforts utilizes several source lists in determining which vendors to use, including (but not limited to): Level 3's internal database of embedded (existing) diverse subcontractors, direct solicitations from small, HUB Zone small, small disadvantaged, veteran-owned small, service-disabled veteran-owned small, and women-owned small business concerns; local chambers of commerce, business opportunity fairs and workshops, minority business enterprise seminars, trade fairs, SBA database of small businesses, DOE database of minority institutions, state databases of registered minority businesses, the NAICS database, and the Women Business Enterprise National Council list.

Our training continues for our sales staff and procurement team on the requirement to utilize socio-economically disadvantaged businesses on a regular basis. Additional outreach efforts to the SBA seeking help in finding HUBZone qualified companies continues. We have taken steps to move all procurement/subcontracting activity to a centralized organization and anticipate finding additional vendors who can successfully compete for work under this contract as new opportunities arise.