ANALYSIS OF COMPENSATION FROM 1999-2001 AT THE DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

Prepared for

Sheppard, Mullin, Richter & Hampton, LLP
Washington, D.C.

Prepared by

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September 15, 2005

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I. Introduction

This analysis was undertaken at the request of Sheppard, Mullin, Richter & Hampton, LLP. ERS Group was asked to review the analysis of the plaintiffs' expert witness and to conduct an analysis of compensation levels at the District of Columbia Water and Sewer Authority (WASA). I am a Director of ERS Group in Washington, D.C. ERS Group is a consulting and research firm whose professionals work with individuals, government agencies, universities, corporations and other businesses to analyze employment decision-making processes. My primary field of research is in the area of employment discrimination. ERS Group charges $325 per hour for my services. A detailed list of my credentials and the list of cases in which I have given testimony are outlined in Exhibit A of this report.

This report is organized as follows: Section II lists the data sources that I have reviewed in preparation of this report. Section III discusses the methodology behind my analyses. Section IV presents the results of the statistical analyses. Section V provides comments on the plaintiffs' expert's analyses. This report concludes with a summary in Section VI.

II. Data Sources

The data and documents I have reviewed for this report are the following:

- Plaintiffs' Second Amended Complaint, dated December 19, 2002.
- Plaintiffs' Brief in Support of Plaintiffs' Amended Motion for Class Certification, dated February 4, 2005 (including exhibits).

- DC Water and Sewer Authority Compensation Policies and Procedures Guidelines (Bates Stamp # D000001-D000168).

- DC Water and Sewer Authority Personnel Policies and Procedures Manual (Bates Stamp # D000853-D001067).

- "Evaluating Whether Employment Practices At District of Columbia Water And Sewer Authority Are Racially Neutral" by Alexander Vekker, Ph.D. Plaintiffs' Expert's Report dated January 21, 2005 (including backup databases and documentation relied upon by the plaintiffs' expert, and the draft transcript of his August 9, 2005 deposition).

- February 6, 2002 Arbitration Transcript, pages 179-345.

- Deposition of Barbara A. Grier, dated November 17, 2004.

- Deposition of Walter F. Bailey, dated October 20, 2004.

- Deposition of Leonard Benson, dated November 12, 2004.

- Collective Bargaining Agreements, dated June 1998 and October 2001.

- Documents related to the WASA performance evaluation process.

- Electronic databases provided by the defendant related to the work histories of WASA employees from 1999 through 2001.

III. Methodology

In this report, I conduct a statistical analysis of the annual compensation rates for the years 1999 through 2001. The goal of this statistical analysis of alleged employment discrimination is to determine whether the observed employment decisions (in this case, compensation) are significantly different than what would be expected in a race-neutral decision-making process. In the context of this case, the question to be answered by my analysis is: once we control for the employee characteristics that determine compensation levels, is there a statistically significant difference in the compensation levels between black and white employees?

The statistical test utilized in my analysis is a multiple regression analysis. Generally speaking, a multiple regression accounts for any systematic differences between the protected and non-protected employees with respect to factors that are used in the compensation decision-making process. After accounting for these systematic differences, we can then determine whether or not the remaining pay differences between black and white employees can be attributed to random chance (i.e., whether or not the pay differences are statistically significant). The 2.0 standard deviation threshold is used to determine whether or not a result is statistically significant.

Compensation Rate Analyses

I was asked to analyze the annual salary levels at WASA during the time period 1999 through 2001. The goal of a statistical analysis of compensation is to construct a statistical model that reflects as closely as possible the decision-making process that was used to establish salary levels. Failure to use a model that reflects the decision-making process may result in misleading conclusions.

Below is an overview of the multiple regression models contained in this report:

1. I examine three snapshots of employees – those who were actively employed at WASA on December 31st of each year (1999, 2000, and 2001).

2. There are different compensation structures for employees within WASA which should be considered in a statistical analysis. The Compensation Policy and Procedures Guidelines provide details about the salary schedules, grades, and steps that are utilized by WASA. For each year-end, I conducted a separate regression analysis for employees in each of the same salary schedules. Based upon the Compensation Policy and Procedures Guidelines, virtually all employees are found in one of the following salary schedules during this time period:[1]

[1] For each year, there are a small number of employees who are not in a pay grade structure. The counts by year are: six in 1999, six in 2000, and one in 2001. The tables in Exhibit B list these individuals.

a. District Service employees (DS)[2]
b. Supervisory Wage (SW)
c. Regular Wage (RW)
d. Leader Wage (LW)
e. "Open" Grades for non-union employees beginning in 2000 and fully implemented in 2001.

3. Consistent with the plaintiffs' expert, this analysis examines only black and white employees.

4. Consistent with the plaintiffs' expert, all Interns are excluded from the analysis.

5. The dependent variable in each regression is the Annual Pay Rate.[3]

6. Each regression controls for the following employee characteristics as of the end of each calendar year:

   a. An indicator for race (black/white). This is the variable at issue. The coefficient associated with this control will tell us whether or not the pay differences between black and white employees are statistically significant after we control for the other factors listed below.

   b. Years of WASA experience (and the squared term). Company seniority is a common control in compensation analyses. The squared term captures the common finding that salary levels increase more quickly at the earlier stages of someone's tenure, and then increase more slowly at the later stages.

   c. A proxy for potential experience prior to working at WASA (and the squared term). Measured as (age-years at WASA – 18). A review of the data indicates that there are multiple instances of employees at the higher levels of the pay grades with relatively fewer years at WASA. Without a control for their prior experience, the regression model would not be able to differentiate between someone highly experienced and someone coming directly from school, potentially providing misleading results.

   d. Job Title. People with different job titles have different pay grades, and thus different salary levels.[4]

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[2] District Service salary schedules are further refined by occupational categories. Service Code A06 covers Clerical DS employees, Service Code A05 covers Engineering and Architecture Professional DS employees, and A01 covers the remaining DS employees. For the DS regressions, I include additional controls for the Service Code category.

[3] The plaintiffs' expert used log(salary) as the dependent variable. This topic will be addressed later in my report.

[4] Deposition of Barbara A. Grier, page 35.

IV. Results of Statistical Analyses

The table in Exhibit D contains the results of the compensation analyses from 1999 through 2001. The below table summarizes the results:[8]

Table 1
Analysis of WASA Annual Compensation 1999-2001

Year End	Salary Schedule	Number of White Employees	Number of Black Employees	Race Differential (annual $)	Number of Standard Deviations	Significance
1999	DS	75	288	$-638	-1.08	none
1999	RW	74	539	$-327	-2.22	negative
1999	SW	26	60	$432	0.53	none
2000	DS	70	257	$-1,110	-1.95	none
2000	Grade	21	57	$452	0.33	none
2000	RW	65	512	$-211	-1.43	none
2000	SW	15	40	$-960	-1.20	none
2001	DS	37	160	$-1,086	-1.29	none
2001	Grade	61	177	$-3,138	-2.46	negative
2001	RW	63	471	$-264	-1.66	none

As can be seen from the above table, from 1999 through 2001, of the ten regression analyses, eight did not show a statistically significant result adverse to black employees. There were two instances (SW in 1999 and Open Grades in 2000) where black employees had a positive pay differential, albeit not a statistically significant difference.

There are two instances where there was a statistically significant result adverse to black employees. RW employees in 1999 had a negative pay differential of $327 per year, which is statistically significant at -2.22 standard deviations. Open Grade employees in 2001

[8] Whether or not there should be a single regression for each year or a separate regression for each pay plan can be addressed from a statistical standpoint as well as a policy standpoint. In the context of this case, the "Chow test is a commonly-used procedure that tests whether or not there is a significant difference in the regression results for each pay plan. The Chow tests for the WASA compensation structures were statistically significant, indicating that it is appropriate to conduct a separate regression analysis for each pay plan. Exhibit E contains the results of the Chow test.

had a significant negative differential of $3,138 on an annual basis, which is statistically significant at -2.46 standard deviations.

Another feature of the multiple regression analysis is that it allows us to focus on the group of employees that most contribute to the significant differential. For the two groups that are statistically significantly negative, we conducted a separate regression for each pay grade within each group.[9] Exhibit F contains the results of these analyses, which are summarized below:

Table 2
Analysis of WASA Annual Compensation
RW in 1999 and Open Grades in 2001

Year End	Salary Schedule	Grade	Number of White Employees	Number of Black Employees	Race Differential (annual $)	Number of Standard Deviations	Significance
1999	RW	03	0	48	.	.	
1999	RW	05	0	23	.	.	
1999	RW	06	0	22	.	.	
1999	RW	07	2	58	$-718	-0.62	none
1999	RW	08	0	48	.	.	
1999	RW	09	28	145	$-97	-0.43	none
1999	RW	10	24	96	$-553	-1.92	none
1999	RW	11	18	98	$-95	-0.32	none
1999	RW	12	2	1	.	.	
2001	Grade	12	0	8	.	.	
2001	Grade	13	0	9	.	.	
2001	Grade	14	0	14	.	.	
2001	Grade	15	13	54	$-920	-0.72	none
2001	Grade	16	10	42	$-1,952	-0.52	none
2001	Grade	17	14	17	$-7,109	-2.12	negative
2001	Grade	18	14	25	$-5,691	-2.58	negative
2001	Grade	19	6	6	.	.	
2001	Grade	20	2	2	.	.	
2001	Grade	21	2	0	.	.	

[9] Because of the relatively small number of people in these by-grade analyses, I do not include a control for title in the by-grade regressions in Table 2.

As the above table demonstrates, for the RW-07 employees, in grades where there are both black and white employees, none of them have a significant differential by themselves. Grade RW-07 (58 black and 2 white employees) has the largest dollar differential at $717 per year.

When the entire RW regression from Table 1 is run without the 60 RW-07 employees (the grade with the largest dollar differential), the pay differential for all of RW falls to $265 per year and is then not statistically significant at -1.78 standard deviations. This indicates that although the overall RW regression is statistically significant, the significance is a borderline result in that it is caused by a relatively small subset of the RW employees.

For the Open Grades in 2001, there are two grades where the differential is significant and adverse to black employees. Grade 17, with a differential of $7,109 is significant at -2.12 standard deviations. Grade 18, with a differential of $5,691, is significant at -2.58 standard deviations.

When the entire Open Grade regression from Table 1 is run without the 31 black employees in Grade 17 (the grade with the largest differential), the pay differential for all of the Open Grades falls to $2,646 and is then not statistically significant at -1.91 standard deviations. Again, this indicates that although the overall Open Grade regression is statistically significant, the significance is caused by a relatively small subset of the Open Grade employees.

The below table summarizes the regression results for RW-07 in 1999 and the Open grades in 2001, when the black employees in the grades with the largest differentials are not included in the analysis. The full table is found in Exhibit G.

Table 3 Analysis of WASA Annual Compensation RW without RW-07 in 1999 and Open Grades without Open Grade 17 in 2001						
Year End	**Salary Schedule**	**Number of White Employees**	**Number of Black Employees**	**Race Differential (annual $)**	**Number of Standard Deviations**	**Significance**
1999	RW	72	481	$-265	-1.78	None
2001	Grade	47	160	$-2,646	-1.91	None

The multiple regression analyses indicate that, although there are a couple instances where there is a significant differential adverse to black employees, in most instances, there is not a significant difference between the annual pay of black employees and the annual pay of white employees at WASA. For those instances where there is a significant differential, the cause of the differential is limited to a relatively small number of employees. From a statistical standpoint, there is not a pattern of statistically significant differentials adverse to all black employees at WASA.

V. Plaintiffs' Expert's Analyses

I have three general concerns with the analysis of the plaintiffs' expert, as set forth in his January 21, 2005 report. First, the regression analysis he constructs inappropriately compares employees who are not similarly-situated (i.e., his analysis fails to account for the fact that these employees are on different pay plans and in different pay grades). A review of the salary schedules clearly shows that the pay levels are determined by the pay plan, grade, and step (and Service Code in the case of DS employees). The plaintiffs' expert's analysis disregards these differences in salary schedules and combines all employees into a single regression analysis per year.

Second, the plaintiffs' expert did not control for other factors that are significant determinants of compensation levels, namely pre-WASA experience, department, and union status. Failure to account for these other factors leads to a statistical model that does not reflect the decision-making process, thus resulting in misleading conclusions.

My third concern is based upon the methodology used in the plaintiffs' expert's analysis of starting pay rates. In his analysis of starting pay, the plaintiffs' expert controlled for race, job title at hire, year of hire, and WASA experience (to the extent that someone had any WASA experience at the time of hire). The plaintiffs' expert's analysis of starting salary did not account for the factors that reflect the employees' qualifications and market value at the time of hire, namely, education, prior experience, pay rate at the previous job, plus any other factors WASA considers to be important when setting initial salary levels.

The plaintiffs' expert uses the natural log of the annual pay rate as his dependent variable, whereas my analysis uses the annual pay rate itself. Since both approaches are common and acceptable, I have no concerns with the plaintiffs' expert's use of the natural log transformation for this case. For comparison purposes, I have run my models using the natural log of the annual pay rate. Exhibit H contains the results of that analysis. A review of the tables in Exhibit H shows that there is less statistical significance with the natural log analysis. The RW employees in 1999 are still statistically significant, but with a smaller number of standard deviations (now at -2.05 s.d., compared to -2.22 s.d. in the annual rate analysis). The Open Grade employees in 2001 now have a borderline result with -2.00 standard deviations (compared to the -2.46 s.d. in the annual rate analysis).[10]

[10] The other tables in Exhibit H show that, similar to the annual pay rate analysis, the significance of these two groups disappears when RW-07 employees in 1999 and Open Grade 17 employees in 2001 are excluded.

VI. Summary and Conclusions

My analysis of the data from 1999 through 2001 shows that, although there are two areas where there is a significant differential between black and white employees' annual compensation, the remaining eight areas show no statistically significant difference between black and white employees' annual compensation.

The two areas where there is a significant differential are both borderline results in that the significance for both groups is generated by a relatively small subset of employees (60 people in 1999 and 31 people in 2001). When these subsets of employees are not in the regressions, there is no statistical significance in any of the analyses.

The plaintiffs' expert's analysis of annual salary produces misleading results for two primary reasons. First, his analysis does not take into account the fact that the compensation levels are set under different pay plans. There are five different pay plans during this time period, yet the plaintiffs' expert's analysis lumps all employees into a single group without consideration for the salary schedule of each employee. Second, the plaintiffs' expert's analyses do not take into account other factors that have been shown to significantly determine compensation levels, namely union status, department, and experience prior to working at WASA. Both of these oversights lead to the plaintiffs' expert's results that appear statistically significantly adverse to all black employees, when in fact most of the black employees are in salary schedules where there is not a significant differential. The analyses contained in my report show that there is no pattern of statistical evidence to suggest that black employees were compensated at a rate that is significantly lower than their white similarly-situated co-workers.

This report is based upon the sources cited herein. If additional information becomes available that substantially changes my conclusions, this analysis is subject to update and revision.

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CERTIFICATION

I hereby certify that the above listed report was written by Paul F. White, Ph.D., on this 15th day of September, 2005.

I certify that I have no interest, present or contemplated, in the above matter and that neither the employment to produce the report, not the compensation, is contingent on the conclusions of the report.

I certify that according to my belief and knowledge, all statements and information in the report are true and correct, subject to the underlying assumptions.

_____

Paul F. White, Ph.D.

Exhibit A

Resume and Testimony
Of
Paul F. White, Ph.D.

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PROFESSIONAL EXPERIENCE:

ERS GROUP
- Director (2002 - present)

Design and conduct statistical analyses of alleged employment discrimination and the valuation of economic losses with emphasis in the area of labor economics. Present expert testimony regarding statistical analysis of employment practices and estimates of economic losses before federal and state courts and in other judicial settings. Develop and implement systems to monitor employment practices. Plan, organize and present seminars on the use of economics and statistics in employment discrimination cases.

- Vice-President ERS Group (1998 - present)

- Research Economist (1993-1998)

Florida State University
- Adjunct Professor (1996-2002)

Member of the graduate faculty for the Executive Management program. Taught courses in Economics and Analytic Research Methods.

National Institute of Health
- Research Fellow (1990-1993)

Awarded fellowship to study the economics of aging.

Womble, Carlyle, Sandridge, and Rice, Winston-Salem, NC
- Consultant (1992)

Researched and analyzed health insurance statistics to be used as evidence in a medical malpractice case.

North Carolina State University
- Research Assistant (1990)

Provided computer programming assistance on several research projects for the Department of Economics and Business.

North Carolina State University
- Teaching Assistant (1989-1990)

Taught "Principles of Economics" labs; prepared lectures, assignments, and examinations for the Department of Economics and Business.

EDUCATION:

Ph.D., North Carolina State University, Labor/Health Economics, 1993

M.E., North Carolina State University, Economics, 1992

B.S., James Madison University, Economics, 1989

HONORS AND AWARDS:

National Institute of Health Fellowship, 1990 to 1993

SPECIALIZATION:

Labor Economics, Health Economics, Economics of Aging

PUBLICATIONS AND RESEARCH PAPERS:

"The Use of Attrition Rates for Economic Loss Calculations in Employment Discrimination Cases - A Hypothetical Case Study," (with Josefina Tranfa and Fredrick Holt) Journal of Forensic Economics, Vol. XVI, No. 2, Spring/Summer 2003 (Published September 2004).

"The Numbers Game: Statistics offered to show discrimination may promise more than they prove," (with Leslie Turner), Legal Times, Volume XXVII, No. 16, April 2004.

"Cost-Efficient Use of Your Expert Witness – From the Expert Witness' Point of View," Bar Bulletin, Maryland State Bar Association, October 2002.

"The Use of an Economist in Labor and Employment Disputes: Legal and Practical Considerations," (with James Garrity), The Florida Bar Journal, Vol. LXXIV, No. 11, December 2000.

"Approaches for Dealing With Small Sample Sizes in Employment Discrimination Litigation," (with Michael J. Piette), Journal of Forensic Economics, Vol. XII, No. 1, Winter 1999.

"Use of 'Reverse Regression' in Employment Discrimination Analysis," (with Michael J. Piette), Journal of Forensic Economics, Vol. XI, No. 2, Spring/Summer 1998.

Review of "Tenure, Discrimination, and the Courts" by Terry L. Leap, Journal of Forensic Economics, Vol. IX, No. 2, Spring/Summer 1996.

"Allocating Time to Caring and Working: Evidence from the National Long-Term Care Survey," working paper with Dr. Ann A. McDermed and Dr. Alvin E. Headen.

Long-Term Care of the Disabled Elderly, "Working vs. Helping - A Caregiver's Dilemma," Ph.D. Dissertation, Department of Economics, North Carolina State University, August, 1993.

"The Proposed Virginia Coal Slurry Pipeline and Its Employment Effects on the Railroad Industry," (with Ehsan Ahmed), Journal of Applied Business Research, Fall, 1990.

PRESENTATIONS/PROFESSIONAL MEETINGS:

"Employment Discrimination: Economic and Statistical Evidence," ERS Group seminar, various dates and locations.

"Crafting Effective and OFCCP Compliant Affirmative Action Plans," ERS Group seminar, various dates and locations.

"Use of Statistics in Employment Litigation," presented as part of a seminar entitled "Federal Aviation Administration Personnel and Labor Law Conference," Atlanta, GA, 2005.

"Economic Damages: The Effects of Explicit and Implicit Methodological Decisions," paper presented as part of a seminar entitled "Current Developments in Labor & Employment Law," The Center of Continuing Professional Development, Louisiana State University, Baton Rouge, LA, 2005.

"Employment Class Actions: Case Law Developments, Statistical Issues and Practical Suggestions," (with Alison B. Marshall). Sponsored by the Bar Association of the District of Columbia, Washington, D.C., 2004.

"The Use of Statistics in Employment Litigation: The Importance of Assumptions," Employment Law Seminar, Sponsored by: Federal Bar Association, Broward County Chapter, Broward County Bar Association - Employment Law Section, Broward County Women Lawyers Association, Fort Lauderdale, Florida, 2003.

"What Happens When We Assume: Don't Let It Happen to Your Economic and Statistical Expert," paper presented as part of a seminar entitled "Current Developments in Labor & Employment Law," The Center of Continuing Professional Development, Louisiana State University, Baton Rouge, LA, 2003.

"The Use (and Misuse) of Economics and Statistics in Employment Litigation," paper presented as part of a seminar entitled "Employment Law 2000: The Right Mix," Louisiana State Bar Association, New Orleans, LA, 2000.

"Analyzing Allegations of Discrimination in Termination Cases," paper presented as part of a seminar entitled "Employee Discharge and Documentation," Tallahassee, Florida, 1995-2000.

"Private Sector Employment Opportunities for Economics Majors," presentation for Omicron Delta Epsilon, Florida State University's economics honor society, Tallahassee, FL, 1998.

"Approaches for Dealing With Small Sample Sizes in Employment Discrimination Litigation," (with Michael J. Piette) paper presented at the Southern Economic Association Annual Meetings, Atlanta, GA, 1997.

"The Use of 'Reverse Regression' in Employment Discrimination Analysis" (with Michael J. Piette), paper presented at the Allied Social Science Association Annual Meetings, New Orleans, Louisiana, 1997.

"Employment Discrimination," presentation for Alpha Kappa Psi, Florida State University's professional business fraternity, Tallahassee, FL, 1996.

"Informal Caregivers of the Disabled: Applications for the Forensic Economist," paper presented at the Southern Economic Association Annual Meetings, New Orleans, Louisiana, 1995.

"Allocating Time to Caring and Working: Evidence from the National Long-Term Care Survey," paper presented at the Southern Economic Association Annual Meetings, Orlando, Florida, 1994.

"Estimating the Shadow Price of Informal Care," paper presented at the Allied Social Science Association Annual Meetings, Boston, Massachusetts, 1994.

"What President Clinton's Health Care Plan Will Mean to You," lecture presented as part of the Valencia Community College Notable Speaker Series, Orlando, Florida, 1994.

PROFESSIONAL ASSOCIATION AND MEMBERSHIPS:

American Economics Association

National Association of Forensic Economics

PROFESSIONAL JOURNAL REFEREE:

Contemporary Economic Policy, Western Economic Association

Journal of Forensic Economics, National Association of Forensic Economics

Litigation Economics Review, National Association of Forensic Economics

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TESTIMONY

Everette Prince v. Barnes Group, Inc. and Bowman Distribution; No. 5:94-CV-483-F(3), U.S. District Court, Eastern District of North Carolina, Western Division. (Declaration)

Kenneth Causey v. City of Gretna, Florida, et al.; No. 94-40586-WS, U.S. District Court, Northern District of Florida, Tallahassee Division. (Deposition)

Joseph C. Mulé, et al. v. Larry Alton Carr, et al.; No. 93-7395 Division "O" Civil Division, Circuit Court, 13th Judicial Circuit, in and for Hillsborough County, Florida. (Deposition)

Stuart N. Robins v. Flagship Airlines and AMR Corporation; No. 94-C3589, Circuit Court, Davidson County, Tennessee. (Declaration)

Louise L. Wilson, Beowulf L. Snell, et al. v. Macon Telegraph Publishing Company, Inc.; No. 5:95-CV-522-2 (DF), U.S. District Court, Middle District of Georgia, Macon Division. (Affidavit)

David Hipp, Harry W. McKown, Jr., et al. v. Liberty National Life Insurance Company; No. 95-1332-CIV-T-17A, U.S. District Court, Middle District of Florida, Tampa Division. (Deposition)

Margaret H. Daniel v. University of Southwestern Louisiana; No. 95-2170, U.S. District Court, Western District of Louisiana, Lafayette-Opelousas Division. (Trial)

Lois Gordon, et al. v. Columbia Gas & Electric, et al., No. 95-CI-0095, Court of Common Pleas, Civil Division, Marion County, Ohio. (Deposition)

Connie Yon and Delores Bryant v. Department of Corrections and Steve Comeford; No. 93-4635, Second Judicial Circuit, Leon County, Florida. (Hearing)

Sergio Bonich, et al. v. Herman Miller, Inc., No. 95-3455/CA21, Circuit, Court, 11th Judicial Circuit, Dade County, Florida. (Deposition)

Caroline Burney v. Rheem Manufacturing Company, Inc., No. CV-97-D-1300-N, U.S. District Court, Middle District of Alabama, Northern Division. (Affidavit)

Pamela L. Biggs v. State of Florida, Board of Regents, No. 1:96-CV-185-MMP, U.S. District Court, Northern District of Florida, Gainesville Division. (Deposition)

Faith D. McKnight v. State of Florida, Department of Health and Rehabilitative Services, et al., No. 96-1167-CIV-J99(S), U.S. District Court, Middle District of Florida, Jacksonville Division. (Deposition)

Grant H. Danskine, et al. v. Metro Dade County, No. 97-2068-CIV-HIGHSMITH, U.S. District Court, Southern District of Florida, Miami Division. (Affidavit & Deposition)

Michael Corlett v. Fine Air Services, Inc., No. 97-3906-CIV-UNGARO-BENAGES, U.S. District Court, Southern District of Florida, Miami Division. (Affidavit)

Gina Edwards v. University of Central Florida, Florida Board of Regents, et. al, No. CI 97-3420(32), Circuit Court, 9th Judicial Circuit, Orange County, Florida. (Deposition)

Garry Joe Tawney v. The Bolles School, No. 97-03038 CA, Circuit Court, 4th Judicial Circuit, Duval County, Florida. (Deposition)

Waymond Pollocks, et al., v. Sunland Training Center at Marianna, Florida, et al., No. TCA 87-40103-RH, U.S. District Court, Northern District of Florida, Tallahassee Division. (Trial)

Jeanette Robinson Ward v. Florida State Hospital, Department of Labor and Employment Security, Division of Workers' Compensation, District "A East". (Affidavit)

Craig H. Hull v. Cash America International, Inc., No.98-607-CIV-ORL-19A, U.S. District Court, Middle District of Florida, Orlando Division. (Deposition)

Robert Schanzer, and Robert R. Madison v. United Technologies Corporation, Pratt & Whitney Aircraft Division, No. 3:98CV00834, U.S. District Court, District of Connecticut. (Deposition and Trial)

Donna Aldret v. State of Florida Department of Labor and Employment Security Division of Workers' Compensation, Claim No. 261-92-1891. (Deposition and Hearing)

Wilma Nicole Stout v. Baxter Healthcare Corporation, No. 4:99 CV 129-EMB, U.S. District Court, Northern District of Mississippi, Greenville Division. (Affidavit)

Theodore R. Perin v. County of Nassau, Nassau County Department of General Services and R.A. Augisiewicz, No. 95-024094, Supreme Court of the State of New York, County of Nassau. (Affidavit)

National Association for the Advancement of Colored People, et al. v. State of Florida Department of Corrections, et al., No. 5:00-CV-100-OC-10, U.S. District Court, Middle District of Florida, Ocala Division. (Affidavits, Hearings, Depositions and Trial Testimony)

Kenneth Epperson, et al. v. Pennzoil Products Company, No. CV97-1797, U.S. District Court, Western District of Louisiana, Shreveport Division. (Affidavits)

American Federation of Government Employees, Local 1617, Kelly Air Force Base, San Antonio, Texas v. San Antonio Air Logistics Center, Kelly Air Force Base, San Antonio, Texas, FMCS No. 990929-17655-3. (Arbitration Testimony)

Birmingham Airport Authority v. Alabama State Licensing Board for General Contractors, No. CV-99-G-1504-S, U.S. District Court, Northern District of Alabama, Southern Division. (Deposition)

Linda Rice Chapman v. Florida Department of Health and Rehabilitative Services, No. 96-23274-CA-09, Circuit Court for the Eleventh Judicial Circuit, Dade County, Florida. (Trial)

Dunkin' Donuts/Third Dunkin' Donuts Realty, Inc. v. Al-Karim Kassam, et al., No. CIV00-1428 LH, U.S. District Court, District of New Mexico. (Affidavit)

Jerry R. Pike and Patrick A. Thomas v. Lucent Technologies, Inc., No. 1 00-CV-1406 RWS, U.S. District Court, District of Georgia, Atlanta Division. (Deposition)

Mary E. O'Shea v. Summit Bancorp, Jill Christians, Antoinette Foti, Kevin Gillen, and Mary Przybyla, No. L-9865-98, Superior Court of New Jersey, Law Division: Bergen County. (Affidavit)

Michelle Iliadis and Angela Nelson-Croxton v. Wal-Mart Stores, Inc., et al., No. L-5498-02, Superior Court of New Jersey, Middlesex County. (Deposition)

John Kohlbek, William Schrack, and Michael Pritchard v. The City of Omaha, Nebraska, a Municipal Corporation, No. 8:03CV68, U.S. District Court, District of Nebraska. (Deposition)

Shelley Hnot, et al. v. Willis Group Holdings Ltd., et al., No. 01-CV-6558 (GEL), U.S. District Court, Southern District of New York. (Declaration)

International Association of Machinists and Aerospace Workers, et al. v. U-Haul International, Inc., et al., No. 28-CA-18783, National Labor Relations Board, Region 28. (Hearing)

Rosa Scott v. Eastman Chemical Company, No. 2:03-CV-311, U.S. District Court, Eastern District of Tennessee, Greenville Division. (Deposition and Affidavit)

Exhibit B

Employees Not On Pay Grade Structure

Exhibit B

Pay Grade "Not Applicable" Employees

1999-2001

Year-End	Clock Number	Grade/Step	Annual	Race	Department	Title	DC Hire Date	WASA Tenure	Pre WASA
1999	1054	NA	$136,000.18	Black (not of Hispanic origin)	General Manager	General Manager	6/23/1997	2.5	31.5
1999	1076	NA	$120,253.12	White (not of Hispanic origin)	Finance & Budget	Financial Manager	7/21/1997	2.4	26.5
1999	1078	NA	$120,253.12	White (not of Hispanic origin)	General Manager	Executive Engineering Manager	9/2/1997	2.3	28.6
1999	1123	NA	$112,766.99	Black (not of Hispanic origin)	General Counsel	Supvy General Attorney	10/23/1998	1.2	28.5
1999	425	NA	$99,823.15	Black (not of Hispanic origin)	Administrative Services	Assistant General Manager	8/8/1983	16.4	24.7
1999	1114	NA	$94,570.11	Black (not of Hispanic origin)	Human Resources	Human Resources Manager	7/20/1998	1.4	29.9
2000	1054	NA	$172,000.19	Black (not of Hispanic origin)	General Manager	General Manager	6/23/1997	3.5	31.5
2000	1076	NA	$122,658.22	White (not of Hispanic origin)	Finance & Budget	Financial Manager	7/21/1997	3.4	26.5
2000	1078	NA	$122,658.22	White (not of Hispanic origin)	General Manager	Executive Engineering Manager	9/2/1997	3.3	28.6
2000	1123	NA	$115,022.34	Black (not of Hispanic origin)	General Counsel	Supvy General Attorney	10/23/1998	2.2	28.5
2000	1114	NA	$96,461.66	Black (not of Hispanic origin)	Human Resources	Human Resources Manager	7/20/1998	2.4	29.9
2000	1596	NA	$35,000.16	Black (not of Hispanic origin)	Information Technologies	Help Desk Support	10/30/2000	0.2	13.9
2001	1054	NA	$172,000.19	Black (not of Hispanic origin)	General Manager	General Manager	6/23/1997	4.5	31.5

Exhibit C

Leader Wage (LW) Employees

1999-2001

Year-End	Clock Number	Grade/Step	Annual	Race	Department	Title	DC Hire Date	WASA Tenure	Pre WASA
1999	125	LW-10/05	$42,660.80	Black (not of Hispanic origin)	Water Services, Distribution	Water Services Worker Leader	11/23/1967	32.1	0.0
1999	218	LW-10/05	$42,660.80	Black (not of Hispanic origin)	Water Services, Distribution	Water Services Worker Leader	3/6/1978	21.8	13.2
1999	389	LW-10/04	$41,121.60	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	3/16/1981	18.8	20.0
1999	705	LW-10/04	$41,121.60	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	12/29/1986	13.0	2.8
1999	39	LW-09/05	$40,518.40	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	6/3/1968	31.6	18.0
1999	61	LW-09/05	$40,518.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	3/15/1966	33.8	2.7
1999	85	LW-09/05	$40,518.40	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	9/18/1968	31.3	3.5
1999	298	LW-09/05	$40,518.40	Black (not of Hispanic origin)	Wastewater Treatment	WWT Plant Operator Leader	1/23/1978	21.9	12.2
1999	586	LW-09/05	$40,518.40	White (not of Hispanic origin)	Facilities, Mgmnt & Security	Painter Leader	11/5/1984	15.2	12.7
1999	279	LW-10/03	$39,603.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	2/8/1982	17.9	16.5
1999	290	LW-10/03	$39,603.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	6/17/1974	25.5	0.2
1999	616	LW-10/03	$39,603.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	4/29/1985	14.7	13.7
1999	531	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	1/22/1985	14.9	4.6
1999	554	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	1/9/1984	16.0	6.5
1999	555	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	1/9/1984	16.0	13.8
1999	666	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	4/2/1986	13.7	2.5
1999	728	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	4/27/1987	12.7	20.4
1999	65	LW-08/05	$38,604.80	Black (not of Hispanic origin)	Material Management	Rigging Leader	3/14/1966	33.8	3.6
1999	92	LW-08/05	$38,604.80	Black (not of Hispanic origin)	Material Management	Rigging Leader	11/28/1966	33.1	2.9
1999	164	LW-08/05	$38,604.80	Black (not of Hispanic origin)	Water Services, Distribution	Water Systems Repairer Leader	5/19/1969	30.6	2.5
1999	562	LW-10/02	$38,084.80	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	1/5/1987	13.0	6.9
1999	293	LW-09/03	$37,627.20	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	7/1/1974	25.5	0.4
1999	746	LW-09/02	$36,171.20	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	7/18/1988	11.5	3.7
1999	747	LW-09/02	$36,171.20	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	10/7/1990	9.2	6.6
1999	547	LW-06/05	$34,340.80	Black (not of Hispanic origin)	Material Management	Materials Handler Leader	7/5/1988	11.5	21.4
1999	761	LW-06/04	$33,113.60	Black (not of Hispanic origin)	Material Management	Materials Handler Leader	9/28/1987	12.3	1.7
2000	125	LW-10/05	$42,660.80	Black (not of Hispanic origin)	Water Services, Distribution	Water Services Worker Leader	11/23/1967	33.1	0.0
2000	218	LW-10/05	$42,660.80	Black (not of Hispanic origin)	Water Services, Distribution	Water Services Worker Leader	3/6/1978	22.8	13.2
2000	389	LW-10/04	$41,121.60	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	3/16/1981	19.8	20.0
2000	705	LW-10/04	$41,121.60	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	12/29/1986	14.0	2.8
2000	298	LW-09/05	$40,518.40	Black (not of Hispanic origin)	Wastewater Treatment	WWT Plant Operator Leader	1/23/1978	22.9	12.2
2000	359	LW-09/05	$40,518.40	Black (not of Hispanic origin)	Wastewater Treatment	WWT Plant Operator Leader	10/1/1977	23.2	8.3
2000	555	LW-09/05	$40,518.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	1/9/1984	17.0	13.8
2000	586	LW-09/05	$40,518.40	White (not of Hispanic origin)	Facilities, Mgmnt & Security	Painter Leader	11/5/1984	16.2	12.7
2000	279	LW-10/03	$39,603.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	2/8/1982	18.9	16.5
2000	290	LW-10/03	$39,603.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	6/17/1974	26.5	0.2
2000	616	LW-10/03	$39,603.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	4/29/1985	15.7	13.7
2000	293	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	7/1/1974	26.5	0.4
2000	531	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	1/22/1985	15.9	4.6
2000	666	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	4/2/1986	14.7	2.5
2000	728	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	4/27/1987	13.7	20.4
2000	736	LW-09/04	$39,062.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	5/26/1987	13.6	5.8
2000	92	LW-08/05	$38,604.80	Black (not of Hispanic origin)	Material Management	Rigging Leader	11/28/1966	34.1	2.9
2000	164	LW-08/05	$38,604.80	Black (not of Hispanic origin)	Water Services, Distribution	Water Systems Repairer Leader	5/19/1969	31.6	2.5

Exhibit C

Leader Wage (LW) Employees

1999-2001

Year-End	Clock Number	Grade/Step	Annual	Race	Department	Title	DC Hire Date	WASA Tenure	Pre WASA
2000	562	LW-10/02	$38,084.80	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	1/5/1987	14.0	6.9
2000	760	LW-10/02	$38,084.80	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	9/28/1987	13.3	7.4
2000	93	LW-09/03	$37,627.20	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	12/5/1966	34.1	7.4
2000	595	LW-09/03	$37,627.20	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	1/14/1985	16.0	3.2
2000	746	LW-09/03	$37,627.20	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	7/18/1988	12.5	3.7
2000	747	LW-09/03	$37,627.20	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	10/7/1990	10.2	6.6
2000	1037	LW-09/02	$36,171.20	Black (not of Hispanic origin)	Sewer Services, Inspection	Small Craft Operator Leader	7/10/1995	5.5	24.9
2000	547	LW-06/05	$34,340.80	Black (not of Hispanic origin)	Material Management	Materials Handler Leader	7/5/1988	12.5	21.4
2000	761	LW-06/05	$34,340.80	Black (not of Hispanic origin)	Material Management	Materials Handler Leader	9/28/1987	13.3	1.7
2001	125	LW-10/05	$49,691.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Services Worker Leader	11/23/1967	34.1	0.0
2001	218	LW-10/05	$49,691.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Services Worker Leader	3/6/1978	23.8	13.2
2001	705	LW-10/05	$49,691.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	12/29/1986	15.0	2.8
2001	279	LW-10/04	$47,923.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	2/8/1982	19.9	16.5
2001	290	LW-10/04	$47,923.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	6/17/1974	27.5	0.2
2001	590	LW-10/04	$47,923.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	12/10/1984	17.1	3.1
2001	616	LW-10/04	$47,923.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	4/29/1985	16.7	13.7
2001	298	LW-09/05	$47,320.00	Black (not of Hispanic origin)	Wastewater Treatment	WWT Plant Operator Leader	1/23/1978	23.9	12.2
2001	359	LW-09/05	$47,320.00	Black (not of Hispanic origin)	Wastewater Treatment	WWT Plant Operator Leader	10/1/1977	24.2	8.3
2001	421	LW-09/05	$47,320.00	Black (not of Hispanic origin)	Wastewater Treatment	WWT Plant Operator Leader	10/10/1978	23.2	1.2
2001	531	LW-09/05	$47,320.00	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	1/22/1985	16.9	4.6
2001	555	LW-09/05	$47,320.00	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	1/9/1984	18.0	13.8
2001	586	LW-09/05	$47,320.00	White (not of Hispanic origin)	Facilities, Mgmnt & Security	Painter Leader	11/5/1984	17.2	12.7
2001	728	LW-09/05	$47,320.00	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	4/27/1987	14.7	20.4
2001	562	LW-10/03	$46,134.40	Black (not of Hispanic origin)	Water Services, Distribution	Water Const Repair Wrkr Leader	1/5/1987	15.0	6.9
2001	293	LW-09/04	$45,614.40	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	7/1/1974	27.5	0.4
2001	666	LW-09/04	$45,614.40	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	4/2/1986	15.7	2.5
2001	736	LW-09/04	$45,614.40	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	5/26/1987	14.6	5.8
2001	164	LW-08/05	$45,219.20	Black (not of Hispanic origin)	Water Services, Distribution	Water Systems Repairer Leader	5/19/1969	32.6	2.5
2001	93	LW-09/03	$43,929.60	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	12/5/1966	35.1	7.4
2001	595	LW-09/03	$43,929.60	Black (not of Hispanic origin)	Sewer Services, Inspection	Sewer Services Worker Leader	1/14/1985	17.0	3.2
2001	746	LW-09/03	$43,929.60	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	7/18/1988	13.5	3.7
2001	747	LW-09/03	$43,929.60	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	10/7/1990	11.2	6.6
2001	826	LW-09/03	$43,929.60	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	8/1/1988	13.4	0.8
2001	760	LW-10/02	$42,244.80	Black (not of Hispanic origin)	Sewer Services, Repair	Sewer Constr Repairer Wrkr Ldr	9/28/1987	14.3	7.4
2001	1037	LW-09/02	$42,244.80	Black (not of Hispanic origin)	Sewer Services, Inspection	Small Craft Operator Leader	7/10/1995	6.5	24.9
2001	547	LW-06/06	$40,518.40	Black (not of Hispanic origin)	Material Management	Materials Handler Leader	7/5/1988	13.5	21.4
2001	761	LW-06/05	$40,518.40	Black (not of Hispanic origin)	Material Management	Materials Handler Leader	9/28/1987	14.3	1.7

Exhibit D

Analysis of WASA Annual Compensation 1999-2001

Exhibit D

Analysis of WASA Annual Compensation
1999-2001

Year End	Salary Schedule	Total Number of Employees	Number of White Employees	Number of Black Employees	Percentage of Black Employees	Race Differential (annual $)	Number of Standard Deviations	Probt	Significance	AdjRsq	ProbF
1999	DS	363	75	288	79.34%	$-638	-1.08	28.31%	none	98.57%	0.00%
1999	RW	613	74	539	87.93%	$-327	-2.22	2.67%	negative	95.67%	0.00%
1999	SW	86	26	60	69.77%	$432	0.53	59.91%	none	80.71%	0.00%
2000	DS	327	70	257	78.59%	$-1,110	-1.95	5.38%	none	98.82%	0.00%
2000	Grade	78	21	57	73.08%	$452	0.33	75.30%	none	99.73%	0.00%
2000	RW	577	65	512	88.73%	$-211	-1.43	15.34%	none	95.87%	0.00%
2000	SW	55	15	40	72.73%	$-960	-1.20	24.96%	none	87.62%	0.00%
2001	DS	197	37	160	81.22%	$-1,086	-1.29	20.05%	none	96.11%	0.00%
2001	Grade	238	61	177	74.37%	$-3,138	-2.46	1.80%	negative	97.12%	0.00%
2001	RW	534	63	471	88.20%	$-264	-1.66	9.85%	none	96.10%	0.00%

Exhibit E

Chow Test Results
1999-2001

Exhibit E		
Analysis of WASA Annual Compensation Chow Test 1999-2001		
Year End	**FValue**	**ProbF**
1999	20.62	0.00%
2000	22.70	0.00%
2001	7.04	0.00%

Exhibit F

Analysis of WASA Annual Compensation
RW in 1999 and Open Grades in 2001
By Grade Level

Exhibit F

Analysis of WASA Annual Compensation
RW in 1999 and Open Grades in 2001

Year End	Salary Schedule	Grade	Total Number of Employees	Number of White Employees	Number of Black Employees	Percentage of Black Employees	Race Differential (annual $)	Number of Standard Deviations	Probt	Significance	AdjRsq	ProbF
1999	RW	03	48	0	48	100.0%	.	.	.		85.74%	0.00%
1999	RW	05	23	0	23	100.0%	.	.	.		76.02%	0.13%
1999	RW	06	22	0	22	100.0%	.	.	.		76.29%	0.03%
1999	RW	07	60	2	58	96.67%	$-718	-0.62	54.04%	none	56.64%	0.00%
1999	RW	08	48	0	48	100.0%	.	.	.		55.27%	0.00%
1999	RW	09	173	28	145	83.82%	$-97	-0.43	66.91%	none	65.54%	0.00%
1999	RW	10	120	24	96	80.00%	$-553	-1.92	5.70%	none	38.56%	0.00%
1999	RW	11	116	18	98	84.48%	$-95	-0.32	74.75%	none	44.48%	0.00%
1999	RW	12	3	2	1	33.33%	.	.	.		.	.
2001	Grade	12	8	0	8	100.0%	.	.	.		.	.
2001	Grade	13	9	0	9	100.0%	.	.	.		20.08%	59.27%
2001	Grade	14	14	0	14	100.0%	.	.	.		.	.
2001	Grade	15	67	13	54	80.60%	$-920	-0.72	47.41%	none	54.70%	0.01%
2001	Grade	16	52	10	42	80.77%	$-1,952	-0.52	61.03%	none	11.38%	33.17%
2001	Grade	17	31	14	17	54.84%	$-7,109	-2.12	5.76%	negative	65.02%	1.20%
2001	Grade	18	39	14	25	64.10%	$-5,691	-2.58	3.24%	negative	87.09%	0.12%
2001	Grade	19	12	6	6	50.00%	.	.	.		.	.
2001	Grade	20	4	2	2	50.00%	.	.	.		.	.
2001	Grade	21	2	2	0	0.00%	.	.	.		.	.

Exhibit G

Analysis of WASA Annual Compensation
RW in 1999 (excluding RW-07)
Open Grades in 2001 (excluding Grade 17)

Exhibit G

Analysis of WASA Annual Compensation
RW w/o RW-7 in 1999 and Open Grades w/o Open Grade 17 in 2001

Year End	Salary Schedule	Total Number of Employees	Number of White Employees	Number of Black Employees	Percentage of Black Employees	Race Differential (annual $)	Number of Standard Deviations	Probt	Significance	AdjRsq	ProbF
1999	RW	553	72	481	86.98%	$-265	-1.78	7.58%	none	95.92%	0.00%
2001	Grade	207	47	160	77.29%	$-2,646	-1.91	6.44%	none	97.46%	0.00%

Exhibit H

Analysis of WASA Annual Compensation
1999-2001
Dependent Variable: log(Annual Compensation)

Exhibit H											
Analysis of WASA Annual Compensation Dependent Variable-Natural Logarithm of Annual Salaries RW w/o RW-7 in 1999 and Open Grades w/o Open Grade 17 in 2001											
Year End	**Salary Schedule**	**Total Number of Employees**	**Number of White Employees**	**Number of Black Employees**	**Percentage of Black Employees**	**Percentage of Annual $ Difference**	**Number of Standard Deviations**	**Probt**	**Significance**	**AdjRsq**	**ProbF**
1999	RW	553	72	481	86.98%	-0.69%	-1.62	10.61%	none	96.57%	0.00%
2001	Grade	207	47	160	77.29%	-4.64%	-1.63	11.11%	none	94.95%	0.00%