

III. HISTORY OF NOW'S EFFORTS TO SECURE ENFORCEMENT

A. Office of Federal Contract Compliance

1. After it was organized in 1966, N.O.W. pressed for amendment of Order 11246 to include sex.
2. August, 1969:
N.O.W. testified at OFCC hearings on proposed guidelines on sex discrimination.
3. N.O.W. pressed for the release of the proposed sex discrimination guidelines, issued Jan. 17, 1969.
4. June 1970
When the guidelines were released June, 1970, N.O.W. protested their weakened form and succeeded in getting the EEOC's definition of bona fide occupational qualification to apply. N.O.W. also protested the elimination of a requirement for goals and timetables in affirmative action programs for women. N.O.W. launched a campaign to bring Congressional pressure on the Labor Department to secure goals and timetables. Support came from Sen. Margaret Chase Smith, Rep. Edith Green, Rep. Patsy Mink, Rep. Florence Dwyer, Sen. Jacob Javits, Sen. Marlow Cook, Sen. Charles Goodell, Rep. Donald Frazier, Rep. Abner Mikva, Rep. Edward Koch and others.
5. July 25, 1970
N.O.W. forced a meeting with Secretary of Labor Hodgson to demand that goals and timetables be applied to women.
6. July 30, 1970
N.O.W. conducted demonstrations at the 14-city National Association of Manufacturers teleconference on equal enforcement to protest the elimination of goals and timetables.
7. July 31, 1970
The next day, Secy. Hodgson issued a statement declaring that goals and timetables would apply to women but that women's availability could not be determined by the methods used for other minorities. He promised to set up a committee to work out procedures for determining availability.
8. October 1970
N.O.W. made recommendations for the members of the Committee and pressed for months for, first, appointment of the Committee, and then for meetings. It took months to get the appointments made and the meeting still had not taken place.

24. (III-A)

9. May, 1970

N.O.W.-Boston filed a complaint against Harvard University charging discrimination in the hiring of faculty.

10. June 20, 1970

N.O.W. filed a complaint against the State University of New York, the largest university in the world. Compliance review is now under way.

11. N.O.W. protested the absence of women in key jobs within the OFCC itself. It demanded that "The top staffs of compliance agencies and all compliance teams must include women in numbers equal to their representation in the population. The OFCC is opening 11 Agency Technical Compliance Offices around the country. Six of the Directors, Deputy-Directors and Community Relations officers of those offices should be women. The Defense Department's Office of Contract Compliance has only one woman among 110 compliance officers and the other departments show similar discrimination. At least half the compliance officers in the country should be women."

12. May 14, 1970

N.O.W. published the first model affirmative action program for universities.

13. May 2, 1970

N.O.W. established a Federal Compliance Committee to press for enforcement of federal equal opportunity requirements for women. The Committee was specifically charged to develop a program and procedures for filing complaints on sex discrimination with OFCC and EEOC.

14. March 20-22, 1970, the N.O.W. national conference passed resolutions calling for N.O.W. officers to develop a program to assist women in filing complaints on sex discrimination and called for N.O.W. action "to insure that enforcement agencies take affirmative action to carry out the law."

15. June 25, 1970

N.O.W. filed a complaint against 1300 major U.S. corporations charging that federal contractors in the list had not filed affirmative action programs with goals and timetables for women's employment. To this date, July 1971, N.O.W. has never even received a letter of acknowledgement or any response to that complaint.

26. (III-A)

23. July 27, 1971:

NOW went to the Department of Labor to demand immediate issuance of regulations applying Order #4 to women.

24. May 10, 1971:

NOW filed a class action against all public school systems in the country that are Federal contractors on the grounds of discrimination against women teachers in salaries, promotions, maternity policies, opportunities for supplementals, and fringe benefits.

25. August, 1971

NOW issued a model affirmative action plan to be sold directly to industry, or by chapters for a percentage. NOW's AAP would put industry in compliance with all government agencies on all bases.

C. Other Agencies

1. Federal Communications Commission (FCC)

NOW discovered that in September, 1970, FCC had issued a ruling calling for affirmative action hiring programs by broadcast licensees. This ruling applied to racial and ethnic minorities, but not to women, even though women were included in the groups against which discrimination was banned. In effect, FCC had decided not to enforce its own order where women were concerned.

NOW officers and members throughout the country sent letters of protest to FCC Commissioner Dean Burch protesting the exclusion of women from broadcasters' affirmative action requirements, and marshalled congressional support.

In January, 1971, NOW filed a legal petition with the FCC asking that its regulations be changed to include women. NOW's petition has been supported by over 30 other organizations, including NAACP, ACLU, the Mexican American Legal Defense Fund, the United Church of Christ, the EEOC, and others.

In July, the FCC issued an amended order in the Federal Register for thirty days to comment.