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Elk Grove, CA 95624

March 1, 2016

Mr. Timothy Sullivan Executive Director
California Public Utilities Commission
Telecommunications Division
505 Van Ness Avenue,
San Francisco, CA 94102

RE: Annual 851 Annual Report Filing

Dear Mr. Sullivan:

Enclosed is Frontier Communications (Citizens Telecommunications Company of California Inc. and Frontier Communications of the Southwest Inc.) annual General Order No. 156 report for 2015.

If you have any questions, please contact Mr. Charlie Born at 916-686-3570, via email at Charlie.born@ftr.com or me at (916) 686-3588, via email at joe.chicoine@ftr.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Chicoine". The signature is stylized and fluid, with the first and last letters being particularly prominent.

Joe Chicoine
Senior Manager, Regulatory Affairs

cc: Stephanie Green, CPUC
Charlie Born, Frontier



2015 ANNUAL REPORT

TABLE OF CONTENTS

Section No.		Page No.
9.0	2015 Annual Report	2
9.1.1	W/M/DVBE Program Activities	2
9.1.2	W/M/DVBE Purchases (included in attached workbook)	4
9.1.3	W/M/DVBE Program Expenses	5
9.1.4	Progress In Meeting Or Exceeding Set Goals	5
9.1.5	Prime contractors utilization Of W/M/DVBE Subcontractors	6
9.1.6	W/M/DVBE Complaints Received And Current Status	6
9.1.7	Purchases/Contracts In Excluded Categories	6
9.1.8	Efforts To Recruit W/M/DVBE Suppliers	7
9.1.9	Document Retention	7
9.1.10	Fuel Procurement Plan	7
9.1.11	Revenue and Payment Data	7
10.0	2016 Annual Plan	8
10.1.1	Short-Term, Mid-Term, and Long Term Goals (included in attached workbook)	8
10.1.2	W/M/DVBE Planned Program Activities	8
10.1.3	W/M/DVBE Recruiting In Low Utilization Areas	9
10.1.4	W/M/DVBE Recruiting In Excluded Areas	9
10.1.5	Plans For Subcontracting	10
10.1.6	Plans For Complying With W/M/DVBE Program Guidelines	10

Attachments: 2015 Diversity Metric Workbook

9.0 2015 ANNUAL REPORT

9.1.1 A DESCRIPTION OF W/M/DVBE PROGRAM ACTIVITIES ENGAGED IN DURING THE PREVIOUS CALENDAR YEAR:

INTERNAL PROGRAM ACTIVITIES

Frontier Communications (Citizens Telecommunications Company of California Inc. along with Frontier Communications of the Southwest Inc.) has had a transformational development year in pursuing additional strategic opportunities in its business operations during 2015 to increase diversity opportunities and customer satisfaction. The 2015 report includes both legal entities above.

In 2015, Frontier, in alignment with the advancement of our strategic sourcing program, has enacted significant steps to improve its diverse sourcing program, including both infrastructure and availability, and has invested company and program resources to improve our diverse sourcing and spend. In summary:

- We have made a significant investment in technology to create an online portal and supplier tracking database to register new partners, actively track their diversity status and allow us to electronically invite businesses to participate in our sourcing events.
- Frontier has established an internal Supplier Diversity Council consisting of team members from Procurement, Regulatory, and Operations and the team is tasked with making improvements to our overall diversity program.
- Frontier's Strategic Sourcing organization will have a resource dedicated to registering suppliers, tracking tier 2 spend, emphasizing its importance to suppliers, and assisting with finding diverse suppliers to participate in our sourcing events.
- In Q4 2015 and continuing in Q1 2016, we are partnering with Verizon's diversity leaders to learn best practices and to include them in the Frontier program.
- Training sessions have been held with our Strategic Sourcing team to ensure they understand both that it is a formal part of our sourcing program and the benefits of involving diverse suppliers in our supply chain. And we have discussed how to identify qualified diverse candidates through better utilization of our supplier portal and the Clearinghouse database.
- In 2015 we also implemented a program to identify and track suppliers with tier 2 diversity spend. This will deliver immediate, as well as long term, improvements to our program while simultaneously emphasizing to suppliers the importance of diverse spend to Frontier.
- The Frontier sourcing team has performed a detailed evaluation of spend to identify goods and services that are sourced by diverse providers to ensure that we are focused on areas where we can make an impact.

In connection with Frontier's acquisition of Verizon California (Decision 15-12-005/Application 15-03-005) that is expected to close by April 1, 2016, Frontier's senior and executive management at the corporate, regional and local levels have made this program a top priority. Frontier is committed to continuing the high level of expertise, community engagement and the performance that this commission experienced with Verizon California. In preparation for the transition of the program from Verizon California to Frontier, employees with both Frontier and Verizon involved with the

program have been working together for Frontier to gain a solid understanding of best practices and processes currently followed by Verizon. Frontier will rely on a combination of national (centralized) and local (West region) team members to staff this initiative and Frontier has also met with Commission staff to discuss best practices and procedures for the program. To better understand and to build relationships with vendors, Frontier met with several of Verizon's longstanding diversity vendors to express our commitment to the program. This sharing and increased level of commitment benefits all of Frontier's operating entities in California. Frontier's senior level management has embraced the programmatic goals and participation at the local and corporate level, including panel participation by Frontier's West Region President, Melinda White, at the Commission's 13th Annual Supplier Diversity En Banc on October 8, 2015. Frontier further committed to insuring that all employees understand and embrace the program and our public-facing website will include a message from CEO Dan McCarthy regarding the importance of Supplier diversity.

Frontier's 2016 Annual Report filed in 2017 will combine Frontier's affiliate companies, including the acquired Verizon company which will be Frontier California Inc., in order to reflect Frontier's total California performance in the program. Frontier fully anticipates the contribution to the overall state effort will continue to improve and be reflective of the best practices and involvement in the program that is being embraced with the addition of the acquired Verizon property in California. Frontier anticipates a 2016 report of robust spending and results for California.

In 2015, Frontier continued its commitment to the W/M/DVBE program and its employees, with operations and purchasing responsibilities by encouraging them to utilize W/M/DVBEs. The Supply Chain group encourages diverse suppliers to register at our online portal that launched in 2015. The portal allows us to track supplier registrations and diversely owned companies for inclusion of diverse suppliers in future bidding opportunities.

Also in 2015, the Frontier Communications Diversity Counsel was formed. This is a cross-functional team supporting the company's diversity program. The group will meet on a regular basis to track key program activities, discuss best practices, and develop action plans to implement them.

As in prior years, copies of Frontier's 2015 annual W/M/DVBE report and plans were distributed to Citizens' executive management employees.

Inquiries from W/M/DVBEs continue to be routed to Regulatory, Operations, Engineering, & Supply Chain or other applicable departments to investigate the possibility of qualifying a potential W/M/DVBE supplier for a specific procurement opportunity. In addition, the role of publicizing available W/M/DVBE vendors and reporting on utilization continues to be a responsibility of a staff member in the Supply Chain Department.

Frontier continued to encourage its main suppliers to include W/M/DVBEs in their subcontracting activities and to report on the results.

EXTERNAL PROGRAM ACTIVITIES

As in past years, Frontier continues to use the Supplier Clearinghouse database as the primary data source of information on qualified W/M/DVBE vendors in the state of California, along with information from news publications and group associations.

With this data available in the supplier portal, we have started working with diverse suppliers not yet aware of the Supplier Clearinghouse to get them registered and verified. This year we also began reaching out to our vendors with tier 2 diverse spend to track their expenditures on a quarterly basis. The implementation of new tracking and monitoring technology has dramatically increase our visibility and control over the program.

In 2016 we will take a more active approach to community outreach, increase our involvement in events that facilitate connections with diverse businesses and identify other opportunities to increase our work with qualified suppliers.

9.1.2 A SUMMARY OF W/M/DVBE PURCHASES:

The attached workbook includes:*

- TAB 1 - 9.1.5 A SUMMARY OF PRIME CONTRACTOR UTILIZATION OF WMDVBE SUBCONTRACTORS
- TAB 2 – 9.1.2 WMDVBE ANNUAL RESULTS BY ETHNICITY
- TAB 3 – PROCUREMENT SPEND - WMDVBE PROCUREMENT BY DIRECT PRODUCT & SERVICE CATEGORY AND SUBCONTRACOR PRODUCT & SERVICE CATEGORY
- TAB 4 – PROGRAM GOALS (SHORT TERM,MID TERM, LONG TERM)
- TAB 5 – REVENUE & PAYMENT DATA
- TAB 6 – TABLE 1A WMDVBE Procurement Results for Large Utilities
- TAB 7 – TABLE 2A WMDVBE Procurement Results for Small Utilities
- TAB 8 – TABLE 4A Summary of Large Utility Ethnic Procurement
- TAB 9 – TABLE 6A Summary of Procurement from Women: 2015 Minority and Caucasian Women (in Dollars and as a Percentage of Large Utilities' Total Corporate Expenditures)
- TAB 10 – TABLE 7A DVBE Procurement for Large and Small Utilities
- TAB 11 – TABLE 9A FUEL PROGRAM
- TAB 12 – TABLE 10A POWER (UTILITY PROGRAM)

*** Tabs are enumerated in workbook.**

9.1.3 W/M/DVBE PROGRAM EXPENSES:

The following is a summary of Frontier’s W/M/DVBE Program expenses incurred in 2015.

Citizens Telecommunications Company of CA	1. March 1, 2015	2. G.O. #156 Sec. 9.1.3

No.	1. Expense Category	(Actual)
1	Wages	\$22,500
2	Other Employee Expenses	
3	Program Expenses	\$1,380
4	Reporting Expenses	
5	Training	\$1,800
6	Consultants	
7	Other – Technology	\$87,000
8	TOTAL	\$112,680

9.1.4 A DESCRIPTION OF PROGRESS IN MEETING OR EXCEEDING SET GOALS AND AN EXPLANATION OF ANY CIRCUMSTANCES THAT MAY HAVE CAUSED THE UTILITY TO FALL SHORT OF ITS GOALS:

The reported direct W/M/DVBE overall expenditures for Frontier increased by \$15,291 over gross procurement in 2014 (\$711,231 versus \$695,940), or +2.76% year over year. This increase is attributed to including tier 2 spending with Staff Management and Anixter and the addition of other direct supplier spend. Frontier reported spending for 2015 totaling \$12,990,005 versus 2014 of \$25,576,420 for an overall decrease of \$12,586,415. The significant decrease in spend is due to improving our processes and defining direct and addressable spend. Regulatory, Utility, Government, Charity, and Benefit expenses are no longer considered to be addressable spend areas going forward.

The telecommunications industry is highly competitive, which requires Frontier’s California companies and Frontier as a whole to continually review costs. Frontier continues to focus on competitive sourcing to reduce expenses and deliver the best value to our shareholders and our customers while ensuring increased spend with diverse businesses.

Frontier continues to make progress toward its participation goals (again, with some differences in the projected distribution amongst qualifying groups), as evidenced in our latest report.

9.1.5 A SUMMARY OF PRIME CONTRACTOR UTILIZATION OF W/M/DVBE SUBCONTRACTORS:

A. EACH UTILITY SHALL ENCOURAGE AND ASSIST ITS PRIME CONTRACTORS TO DEVELOP PLANS TO INCREASE THE UTILIZATION OF W/M/DVBE AS SUBCONTRACTORS

Frontier's Supply Chain / Strategic Sourcing Department will continue its on-going goal of ensuring W/M/DVBE clauses are included in applicable supplier agreements that are executed in 2016 and requesting that new suppliers certify W/M/DVBE status during initial registration via our online portal. Frontier will be including W/M/DVBE activity by suppliers in its ongoing updating of selected vendor lists in 2016.

B. PRIME CONTRACTORS SHALL BE ENCOURAGED TO SUBMIT TO THE UTILITY, PLANS THAT INCLUDE GOALS FOR THE UTILIZATION OF W/M/DVBES AS SUBCONTRACTORS

Frontier's Supply Chain / Strategic Sourcing Department will continue its on-going goal of ensuring W/M/DVBE clauses are included in applicable supplier agreements that are executed in 2016 and requesting that new suppliers certify W/M/DVBE status during initial registration via our online portal. Frontier will be including W/M/DVBE activity by suppliers in its ongoing updating of selected vendor lists in 2016.

9.1.6 A LIST OF W/M/DVBE COMPLAINTS RECEIVED DURING THE PAST YEAR, ACCOMPANIED BY A BRIEF DESCRIPTION OF THE NATURE OF EACH COMPLAINT AND ITS RESOLUTION OR CURRENT STATUS:

Frontier did not receive any formal complaints filed with the Commission in connection with its W/M/DVBE program during the 2015 reporting period.

Frontier maintained an internal appeals process as outlined in GO 156, Section 7, to accept, review and resolve complaints relating to Frontier's California W/M/DVBE program.

9.1.7 A SUMMARY OF PURCHASES AND/OR CONTRACTS FOR PRODUCTS AND SERVICES IN EXCLUDED CATEGORIES:

Not applicable according to Decision 03-11-024.

9.1.8 A DESCRIPTION OF ANY EFFORTS MADE TO RECRUIT W/M/DVBE SUPPLIERS OF PRODUCTS OR SERVICES IN PURCHASING CATEGORIES WHERE W/M/DVBE UTILIZATION HAS BEEN LOW, SUCH AS LEGAL AND FINANCIAL SERVICES, FUEL PROCUREMENT, AND AREAS THAT ARE CONSIDERED HIGHLY TECHNICAL IN NATURE:

The Procurement Department ensured that inquiries from vendors were answered individually and in a timely fashion. In addition, any and all materials/brochures from W/M/DVBEs were routed to the appropriate personnel for review to determine if there were purchasing opportunities for the supplies/services offered. The tasking of a staff member in the Supply Chain Department with co-coordinating the identification and reporting of potential W/M/DVBE suppliers continues to bring consistency and structure to these efforts. We have made changes to internal sourcing processes that will require that W/M/DVBEs are included in such events. Furthermore, we have begun working with a diverse supplier not registered with the clearing house to ensure that the necessary documentation is filed. These process and policy changes will help to enhance our inclusion and make lasting improvements to our program into the future.

9.1.9 UTILITIES SHALL RETAIN ALL DOCUMENTS AND DATA THEY RELY ON IN PREPARING THEIR WMDVBE ANNUAL REPORT FOR THE LONGER OF EITHER THREE YEARS OR IN CONFORMANCE WITH THE UTILITIES' INDIVIDUAL DOCUMENT RETENTION POLICIES, AND SHALL PROVIDE THESE DOCUMENTS AND DATA TO THE COMMISSION UPON REQUEST:

Frontier will comply with the requirements specified in General Order No. 156.

9.1.10 EACH UTILITY WHICH ELECTS TO REPORT FUEL PROCUREMENT SEPARATELY MUST FILE WITH THE EXECUTIVE DIRECTOR BY MARCH 1 OF EACH YEAR, BEGINNING IN 1991, A SEPARATE DETAILED AND VERIFIABLE REPORT ON WMDVBE PARTICIPATION IN FUEL MARKETS:

Not applicable

9.1.11 REVENUE AND PAYMENT DATA:

In compliance with ordering paragraph 1 of D: 06-11-028, THE ATTACHED WORKBOOK provides, Frontier's "Data on the Number of Vendors" and "Revenue and Payment Data".

10.0 2016 ANNUAL PLAN

10.1.1 SHORT, MID-TERM AND LONG-TERM GOALS:

It is the goal of Frontier and Frontier's Corporate Supply Chain Organization to continue to develop and implement programs that maximize opportunities for vendor applicants regardless of race, creed, color, religion, gender or economic status. In 2016 Frontier's acquisition of Verizon California will greatly increase our presence in the state, particularly in more densely populated areas of California, and this increased presence will allow us to accelerate diverse vendor participation. We will also work with several California based advocacy groups to help expand our portfolio of diverse vendors competing to provide goods and services to Frontier. Finally, as noted previously, we are partnering with Verizon to share best practices and ensure that we build upon their expertise and increase our momentum in this area.

The attached spreadsheet (see attached workbook) provides Frontier's short term, mid-term and long-term goals, with a breakdown by Standard Industrial Classification (SIC) Major Group, and Product category, for the utilization of W/M/DVBE vendors. Our short-, mid- and long-term goals recognize our continued commitment to W/M/DVBE opportunities. The short-term (2016), mid-term (2018) and long-term (2020) goals of W/M/DVBE participation against gross procurement are expected to follow the existing trend based on the expectation that reduced spend over the period will provide for a fixed percentage of W/M/DVBE spend. Frontier continues to research new product and service offerings for introduction to customers. At this time, however, it is unclear when new product offerings may be made available to Frontier's customers, and it is unknown whether qualifying W/M/DVBE suppliers are, or will be, active in the supply and servicing of these products. The goals provided in the attached tables will be adjusted at the time of Verizon California's integration into our business. Verizon currently has a much larger spend, supply base, and diverse supplier utilization as compared to Frontier. We will take their 2015 goals and achievement into account when we complete our 2016 report and generate our 2017 targets.

Frontier will continue to increase our focus and our efforts to meet the W/M/DVBE purchases at the goals set forth in GO 156, the PUC D.95-12-045, and to improve upon these goals whenever opportunities arise.

10.1.2 A DESCRIPTION OF W/M/DVBE PROGRAM INTERNAL AND EXTERNAL ACTIVITIES PLANNED FOR THE NEXT CALENDAR YEAR:

- Suppliers are encouraged to register at our online portal and include their diversity status and classification. Currently there aren't goals set for LGBTBE suppliers but our registration includes that as a selection and we can track progress with these suppliers today.
- Continue to encourage and work with staff responsible for purchasing and sourcing decisions to ensure inclusion of W/M/DVBEs in all purchasing and contracting activities.
- Process and Policy changes made in 2015 now require each sourcing event to include diverse suppliers where applicable.

- A newly developed Tier 2 spend tracking process implemented in 2015 will allow us to report Tier 2 spend with our suppliers. We have identified several opportunities in 2016 where we can make improvements such as: Contingent Labor Staffing Programs, Outside Plant Construction, Technology Providers, Supply Chain and Distribution Partners, Marketing Firms, Alternate Channel Suppliers, Call Center Vendors, and other various goods and services suppliers.
- Make lists of W/M/DVBEs available to personnel with buying duties, coordinated through Corporate Procurement.
- Increase Company awareness of the program and accomplish the objectives of CTC-California's annual W/M/DVBE Plan through enhanced coordination with Corporate Procurement.
- Improve local contact with W/M/DVBE organizations, community agencies and community leaders to further promote the Company's program. As part of Frontier's inclusion of the acquired Verizon California operation and program and commitments made with the Commission, Frontier will be very engaged with community organizations such as Greenlining, as well as others, to participate in supplier diversity outreach programs and engage in active and robust dialogue with potential vendors. Frontier has brought in house the necessary skills and talent to insure that its diversity and supplier programs are successful. This process is fully supported by Frontier senior management and communicated to all levels.

10.1.3 PLANS FOR RECRUITING W/M/DVBE VENDORS OF LOW UTILIZED AREAS:

Frontier will continue to:

- Urge all potential uncertified W/M/DVBEs to apply for and maintain clearinghouse or reciprocal agency certification;
- Search the listings of verified vendors within the low utilization categories to make contact and develop relationships that will lead to greater utilization;
- Work actively with other utilities to share ideas on how to identify and solicit new W/M/DVBE vendors; and
- Work with community organizations to drive diverse participation in Frontier Sourcing and participate in various events to publicize the Frontier program.

10.1.4 PLANS FOR SEEKING AND/OR RECRUITING W/M/DVBE VENDORS IN ANY EXCLUDED CATEGORY AND AREAS WHERE SUPPLIERS ARE CURRENTLY UNAVAILABLE:

Frontier will continue to seek opportunities in the purchase of significant products and services, and will encourage local management to expand opportunities for W/M/DVBE vendors in the product and services categories in which they are available.

10.1.5 PLANS FOR ENCOURAGING BOTH PRIME CONTRACTORS AND GRANTEES TO ENGAGE W/M/DVBEs IN SUBCONTRACTS IN ALL CATEGORIES WHICH PROVIDE SUBCONTRACTING OPPORTUNITIES:

Frontier will continue to encourage its prime suppliers to measure and report on their utilization of W/M/DVBE vendors as subcontractors, and provide reliable detailed reporting of such activity for inclusion on this report.

Frontier will continue to refer prime contractors to listings of verified W/M/DVBE vendors published on the Internet by the WMBE Clearinghouse for their use. In addition, the company's Procurement Department will make efforts to ensure that a W/M/DVBE clause asking suppliers to include W/M/DVBE sub-contractors, as appropriate, and report on resulting W/M/DVBE activity is part of future agreements.

10.1.6 PLANS FOR COMPLYING WITH THE W/M/DVBE PROGRAM GUIDELINES ESTABLISHED BY PU CODE 8283:

Frontier will continue its efforts to identify and include as many W/M/DVBEs as possible in its procurement activities and to follow the program guidelines established by the Commission. Frontier's senior Procurement Department management will continue to actively communicate to their direct reports, on a routine basis, the need to positively influence W/M/DVBE activity and meet Frontier's goals.

Frontier Communications	2015 Annual Report	G.O. #156 Sec. 9.1.5
A SUMMARY OF PRIME CONTRACTOR UTILIZATION OF WMDVBE SUBCONTRACTORS		

	Minority Male	Minority Female	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Women Minority Business Enterprise (WMBE)	Service Disabled Veterans Business Enterprise (DVBE)	Other*	TOTAL WMDVBE
Direct \$	\$17,503	\$0	\$17,503	\$583,935	\$601,438	\$2,436		\$603,874
Subcontracting \$	\$0	\$0	\$0	\$107,357	\$107,357	\$0		\$107,357
Total	\$17,503	\$0	\$17,503	\$691,292	\$708,795	\$2,436		\$711,231

Direct %	0.1%	0.0%	0.1%	4.5%	4.6%	0.0%		4.6%
Subcontracting %	0.0%	0.0%	0.0%	0.8%	0.8%	0.0%		0.8%
Total %	0.1%	0.0%	0.1%	5.3%	5.5%	0.0%		5.5%

Net Procurement	\$12,990,005
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NOTE: *FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVBE

Final - GO 156 Report

WMDVBE ANNUAL RESULTS BY ETHNICITY

	2015			Total \$	%
	Direct	Sub	Total		
1	Asian Pacific American	\$17,470	\$0	\$17,470	0.1%
2	African American	\$12	\$0	\$12	0.0%
3	Hispanic American	\$21	\$0	\$21	0.0%
4	Native American	\$0	\$0	\$0	0.0%
5	Total Minority Male	\$17,503	\$0	\$17,503	0.1%
6	Asian Pacific American	\$0	\$0	\$0	0.0%
7	African American	\$0	\$0	\$0	0.0%
8	Hispanic American	\$0	\$0	\$0	0.0%
9	Native American	\$0	\$0	\$0	0.0%
10	Total Minority Female	\$0	\$0	\$0	0.0%

11	Total Minority Business Enterprise (MBE)	\$17,503	\$0	\$17,503	0.1%
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12	Total Women Business Enterprise (WBE)	\$583,935	\$107,357	\$691,292	5.3%
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13	Subtotal Women, Minority Business Enterprise (MWBE)	\$601,438	\$107,357	\$708,795	5.5%
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14	Total Service Disabled Veteran Business Enterprise (DVBE)	\$2,436		\$2,436	0.0%
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15	Total Other*			\$0	0.0%
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16	TOTAL WMDVBE	\$603,874	\$107,357	\$711,231	5.5%
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17	Net Procurement**	\$12,990,005			
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NOTE: *FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVBE
 **NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS.

Attachment #1: Procurement Spend

Frontier Communications		WMDVBE PROCUREMENT BY DIRECT PRODUCT & SERVICE CATEGORY - DETAIL												2015		G.O. #156 Sec. 9.1.2				
Major Group	Description	Asian		Black		Hispanic		Native-Amer.		Other		Total Minority		Total Minority Women	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Subtotal Minority Business Enterprise (WMBE)	Service Disabled Business Enterprise (DWBE)	Total WMDVBE	
		Men	Women	Men	Women	Men	Women	Men	Women	Men	Women									
13	Oil & Gas Extraction	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
17	Construction Special Trade Contractors	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
34	Fabricated Metal Products, Except Machinery & Transportation Equipment	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
36	Electronic & Other Electrical Equipment & Components, Except Computer Equipment	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
50	Wholesale Trade-durable Goods	\$ 17,470	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
51	Wholesale Trade non-durable Goods	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
73	Business Services	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
82	Educational Services	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
	Total	\$ 17,470	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
	Gross Product & Service Procurement	\$ 803,874																		
	Gross California Procurement	\$ 12,890,008																		

Percentages are WMDVBE expenditures compared to total spend for Frontier Communications

Frontier Communications		WMDVBE PROCUREMENT BY SUBCONTRACTOR PRODUCT & SERVICE CATEGORY - DETAIL												2015		G.O. #156 Sec. 9.1.2			
Major Group	Description	Asian		Black		Hispanic		Native-Amer.		Other		Total Minority		Total Minority Women	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Subtotal Minority Business Enterprise (WMBE)	Service Disabled Business Enterprise (DWBE)	Total WMDVBE
		Men	Women	Men	Women	Men	Women	Men	Women	Men	Women								
13	Oil & Gas Extraction	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
17	Construction Special Trade Contractors	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
34	Fabricated Metal Products, Except Machinery & Transportation Equipment	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
36	Electronic & Other Electrical Equipment & Components, Except Computer Equipment	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
50	Wholesale Trade-durable Goods	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
51	Wholesale Trade non-durable Goods	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
73	Business Services	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
82	Educational Services	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
	Total	\$ 0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
	Gross Product & Service Procurement	\$ 107,357																	
	Gross California Procurement	\$ 12,890,008																	

Percentages are WMDVBE expenditures compared to total spend for Frontier Communications

Attachment #3: Revenue and Payment Data

Frontier Communications

# MWDVBes	Data on Number of Vendors							
	Revenue Reported to CHS			Utility-Specific 2015 Summary				
	DVBE	MBE	WBE	Grand Total	DVBE	MBE	WBE	Grand Total
Under \$1 million	1	0	1	2	1	3	12	16
Under \$5 million	0	1	2	3	0	0	0	0
Under \$10 million	0	0	1	1	0	0	0	0
Above \$10 million	0	0	0	0	0	0	0	0
Total	1	1	4	6	1	3	12	16

MWDVBE \$M	Revenue and Payment Data							
	Revenue Reported to CHS			Utility-Specific 2015 Summary				
	DVBE	MBE	WBE	Grand Total	DVBE	MBE	WBE	Grand Total
Under \$1 million	\$ -	\$ -	\$ 79,247.00	\$ 79,247.00	\$ 2,436.00	\$ 17,503.00	\$ 691,292.42	\$ 711,231.42
Under \$5 million	\$ -	\$ 1,375,689.00	\$ 3,026,514.00	\$ 4,402,203.00	\$ -	\$ -	\$ -	\$ -
Under \$10 million	\$ -	\$ -	\$ 7,353,860.00	\$ 7,353,860.00	\$ -	\$ -	\$ -	\$ -
Above \$10 million	\$ -	\$ 126,245,500.00	\$ 802,130,301.00	\$ 928,375,801.00	\$ -	\$ -	\$ -	\$ -
Total	\$ -	\$ 127,621,189.00	\$ 812,589,922.00	\$ 940,211,111.00	\$ 2,436.00	\$ 17,503.00	\$ 691,292.42	\$ 711,231.42

**Table 1A
2015 WMDVBE Procurement Results for Large Utilities**

	2015 Total Procurement	MBE	WBE	DVBE	Total WMDVBE
Frontier Communications					
Direct	\$12,990,005	\$17,503 0.13%	\$583,935 4.50%	\$2,436 0.02%	\$603,874 4.65%
Subcontracting					
Combined	\$12,990,005 100.00%	\$0 0.00%	\$107,357 0.83%	\$0 0.00%	\$107,357 0.83%
		\$17,503 0.13%	\$583,935 4.50%	\$2,436 0.02%	\$711,231 5.48%

Table 2 A
2015 WMDVBE Procurement Results for Small Utilities

	2015 Total Procurement	MBE	WBE	DVBE	Total WMDVBE
Frontier Communications					
Direct		\$ %	\$ %	\$ %	\$ %
Subcontracting		\$ %	\$ %	\$ %	\$ %
Combined	\$ 100.00%	\$ %	\$ %	\$ %	\$ %

Table 4a
2015 Summary of Large Utility Ethnic Procurement
(in Dollars and as a Percentage of Total MBE Procurement)

Frontier Communications	
Black	
direct	\$12 0.07%
sub	\$0 %
combined	\$12 0.07%
Hispanic	
direct	\$21 0.12%
sub	\$0 %
combined	\$21 0.12%
Asian-Pacific	
direct	\$17,470 99.81%
sub	\$0 %
combined	\$17,470 99.81%
Native American	
direct	\$0 %
sub	\$0 %
combined	\$0 %
Other	
direct	\$0 0.00%
sub	\$0 %
combined	\$0 0.00%
Total	\$17,503
MBE Procurement	100.00%

Table 6a

**Summary of Procurement from Women: 2015
Minority and Caucasian Women (in Dollars and as a Percentage of
Large Utilities' Total Corporate Expenditures)**

	Minority Women	Caucasian Women	Combined Women	Total Procurement
Frontier Communications				
direct	\$0 0.00%	\$583,935 4.50%	\$583,935 4.50%	\$12,990,005
subcontracting	\$0 0.00%	\$107,357 0.00%	\$107,357 0.00%	\$12,990,005
combined	\$0 %	\$691,292 2.66%	\$691,292 2.66%	\$25,980,010 100.00%

Table 7a

**2015 DVBE Procurement for Large and Small Utilities
(in Dollars and as Percentage of Total Corporate Procurement)**

	2015 DVBE Procurement	2015 Total Procurement
Frontier Communications	\$2,436	\$12,990,005
	0.02%	

Table 9a ANNUAL FUELS FOR NON-GENERATION: PRODUCT RESULTS BY ETHNICITY

Product ¹	Unit	Asian-Pacific		African-American		Latino		Native American		Other		Minority Business Enterprise	Women Business Enterprise	Disabled Veteran Business	TOTAL WIDWBE	TOTAL PROCUREMENT
		Male	Female	Male	Female	Male	Female	Male	Female	Male	Female					
		Subtotal	Subtotal	Subtotal	Subtotal	Subtotal	Subtotal	Subtotal	Subtotal							
NATURAL GAS	\$															
	%															
	\$															
LPG	\$															
	%															
	\$															
Grand Total	TOTAL \$															
	TOTAL %															100.00%

¹ Excludes purchases from the CAISO, other IOUs, utilities, Federal entities, State entities, Municipalities and renewables.

Frontier does not have this level of detail available

Table 10a
ANNUAL POWER PRODUCT RESULTS BY ETHNICITY

Product ¹	Unit	Asian-Pacific		African-American		Latino		Native American		Other		Minority Business Enterprise	Women Business Enterprise	Service Disabled Veteran	Sub Contracting	TOTAL WMDVBE	TOTAL PROCUREMENT
		Male	Female	Male	Female	Male	Female	Male	Female	Male	Female						
		Subtotal	Subtotal	Subtotal	Subtotal	Subtotal	Subtotal	Subtotal	Subtotal	Subtotal	Subtotal						
Renewable Power Products Direct	\$																
Non-Renewable Power Products Direct	\$																
Diesel Direct	\$																
Nuclear Direct	\$																
Natural Gas Direct	\$																
Subtotal \$	\$																
Subtotal %	%																
Total	\$																100.00%

¹Excludes purchases from the CMSO, other IOU, utilities, Federal entities, State entities, Municipalities and cooperatives

²Includes only long term power procurement commitments after 2011 or as a result of RFPs after 2011

³This report for 2012 is on a cash basis and includes only transactions with payments made to WMDVBE in 2012

Figures does not have the level of detail available