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March 1, 2021

**VIA ELECTRONIC FILING**

Ms. Rachel Peterson  
Executive Director, Communications Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3288

**Re: Frontier's General Order 156 Compliance Filing - 2020 Annual Report and Annual Plan**

Dear Ms. Peterson:

Pursuant to General Order 156 ("GO 156"), Frontier California Inc. (U-1002-C), Citizens Telecommunications of California Inc. (U-1024-C) and Frontier Communications of the Southwest Inc. (U-1026-C), (collectively "Frontier") hereby electronically files its 2020 Annual Report and Annual Plan in compliance with GO 156, Sections 9 and 10. This report is available to others upon request.

Please contact me with any questions at [charlie.born@ftr.com](mailto:charlie.born@ftr.com) or Dawn Gilbert at [dawn.gilbert@ftr.com](mailto:dawn.gilbert@ftr.com).

Sincerely,

Charlie Born  
Director, Government and External Affairs

cc: [Stephanie.Green@cpuc.ca.gov](mailto:Stephanie.Green@cpuc.ca.gov)  
Dawn Gilbert, Frontier



**2020 ANNUAL REPORT AND ANNUAL PLAN**

**WOMEN, MINORITY, DISABLED VETERAN, AND  
LGBT OWNED BUSINESS ENTERPRISES**

**California Public Utilities Commission  
March 1, 2021**



2020 ANNUAL REPORT AND ANNUAL PLAN

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### INTRODUCTION

Frontier California Inc. (U-1002-C), Citizens Telecommunications of California Inc. (U-1024-C) and Frontier Communications of the Southwest Inc. (U-1026-C), (collectively “Frontier”) submits this consolidated 2020 Annual Report and Annual Plan in compliance with General Order 156 (“GO 156”) of the California Public Utilities Commission (“CPUC”).

This report documents Frontier’s supplier diversity activities and results for 2020, the fifth reporting year since Frontier assumed operation of the landline operations of Verizon California Inc. as approved in D.15-12-005. As Frontier enters its sixth year of reporting, our evolution in growing the WMDVLGBTQE’s spend has returned to a path of renewal in a year that has been a challenging one for the books. In 2020 with the pandemic, protests and global racial unrest, Frontier was a leader in cultivating minority spend and developing WMDVLGBTE supplier relationships for forthcoming procurement with the first virtual series for diverse suppliers in a collaboration with Gas, Energy, and other Joint Utility partners. During this year’s series of expected events, Frontier supported the minority supplier community via weekly Supplier Sessions during Q1 and Q2 to provide insight to opportunity, programs and support not only via our organization but also others collaboratively throughout the state. With consistent progress to achieve the GO 156 goals as well as supplier diversity commitments made in the acquisition, we experienced growth in our 2<sup>nd</sup> tier spend with WMDVLGBTE’s suppliers throughout the supply chain.

Frontier continues to make supplier diversity a priority with senior leadership and throughout the organization as a component of an overall corporate commitment to diversity and inclusion. In 2020, Frontier focused on diversity by taking a deeper dive into the impact of the world events to our supplier community. This report describes Frontier’s specific procurement practices, internal program activities, and significant partnerships with external organizations that are driving Frontier’s continued improvement in achieving GO 156 goals. Frontier’s total 2020 spend with minority business enterprises (“MBE”) and women business enterprises (“WBE”) continues to exceed the GO 156 goals. Frontier has developed targeted initiatives designed to increase procurement opportunities for disabled veteran business enterprises (“DVBE”) and lesbian, gay, bisexual and transgender (“LGBTE”) business enterprises with collaborations targeted at developing relationship for future initiatives. Particularly in 2020, Frontier collaborated in the efforts to support the LGBTE goal setting which is formally with under review CPUC. Gratefully, it’s been a year of collaborations as we look forward for the evolution of the next generation of Supplier Diversity practices and initiatives.

In 2020 with the 360 pivoting of our supply chain, Frontier focused on the goal of achieving over 40 percent spend, which is above last year and well over the commissions aspirational goal of 20 percent. We are on a continuing trend of exceeding the goals, to achieve diversity spend reflective of the communities we serve and maintaining our commitment under the acquisition agreement.

Frontier actively works to support procurement opportunities for WMDVLGBTBEs to increase their capacity and grow our supplier diversity program. As we continue to be impacted by changes in structure, ownership and certification of WMDVLGBTE, we have been able to pivot our supply chain in such a way to cultivate growth. As we know, supplier diversity is a journey not a destination. At Frontier, we realize that supplier diversity requires a focused commitment

## **Frontier Communications**

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for continued improvement and Frontier is committed to providing access, growth and development opportunities for WMDVLGBTBE's. Annually, Frontier forecasts opportunities for WMDVLGBTBE's but many times those evolve and change direction throughout the year based on the needs of the business. At Frontier we strive to reflect the community we serve through our supplier outreach and throughout our supply chain.

Frontier is committed to continuous improvement in its supplier diversity program, including significant initiatives for 2020 described in this report, aimed at achieving results to meet or exceed GO 156 goals in all categories.

Frontier discusses each topic required in this report in Sections 9.1.1 through 9.1.11.

**9.0 2020 ANNUAL REPORT**

<b>Frontier Communications</b>	<b>2020</b>	<b>G.O. #156 Sec. 9.1.1</b>
<b>Description of WMDVLGBTBE Program Activities During the Previous Calendar Year</b>		

Frontier is committed to increasing year over year spend with diverse suppliers. In 2020, Frontier continued to focus on total spend improvement to meet its women, minority, disabled veteran, and lesbian, gay, bisexual and transgender business enterprise (“WMDVLGBTBE”) goals. Frontier continues to take a holistic approach to Supplier Diversity offering suppliers in-sight, mentoring, follow ups and guidance in approach. Including diverse suppliers in our sourcing process allows us to provide unsurpassed value to our customers by helping increase the number and types of quality products and services Frontier offers.

**INTERNAL PROGRAM ACTIVITIES**

Below are some of the highlights from 2020:

- In 2020, a specific highlight which will not be reflected in our numbers is the support we have provided suppliers via referrals to other utility and organizations. As an example of our continued support to MWDVLGBTBE suppliers, Frontier connected the supplier to our partner and the supplier was awarded a contract which afforded them the opportunity to provide their employee’s healthcare coverage for the first time ever. Subsequently, due to their performance at such a high level they received an order for quadruple their initial order. The supplier an African American woman owned business will not be reflected in our report, but Frontier made a difference in her business. At a time when we should all want to be the good in the world we want to see in the world, Frontier did just that.
- Frontier was the first utility in California to lead a virtual Supplier Sessions for the first four weeks in April for the African American supplier community to include representatives from the SBA, CBO’s and multiple members of the Joint Utilities. The sessions were attended by over 1,000 suppliers and received recognition from the CPUC and governmental leaders for our immediate action in support of the diverse supplier community.
- Frontier continued its commitment to supplier diversity by communicating the importance of including diverse suppliers in the sourcing process to California employees with operations and purchasing responsibilities. Frontier’s senior leadership issued multiple communications outlining the importance of and our commitment to supplier diversity.
- Frontier co-hosted LaGLCC’s.

## Frontier Communications

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- Professional Services Supplier Sessions in collaboration with SO Cal Gas and California American Water in May and June.
- Construction Services Supplier Sessions in collaboration with SO Cal Gas and California American Water in May and June
- Although 2020 has been a battle and Frontier has been recognized as a battle buddy for its support of the workshops throughout the year and support as a sponsor and facilitator during their 2020 conference.
- Frontier's strategic sourcing team continues to renegotiate grandfathered service agreements in the category of construction and outside plant maintenance to provide additional access for California WMDVLGBTBE's.
- The Frontier sourcing team performs quarterly reviews encompassing detailed evaluation of spend to identify goods and services to ensure that we are focused on areas where we can make the most impact within our Supply Chain.
- Frontier continues to review group and individual diverse spending goals in order to drive focused utilization of diverse suppliers.
- Frontier reviewed detailed spend analytics that categorize vendors, spend, and allows users to identify top areas of opportunity. We have built out a robust calendar of sourcing opportunities that is reviewed at least quarterly by program leadership to ensure diverse suppliers are included in spend opportunities.
- Frontier pivoted from one of our largest Hispanic owned businesses which has become majority owned to transition the spend to other minority suppliers maintaining and diversifying the spend moving forward.

**EXTERNAL PROGRAM ACTIVITIES**

- In 2020 Frontier once again hosted supplier sessions in collaboration with California American Water, SDGE, and the California Water Association with LGBTE Suppliers in Construction and added a session in contingent labor. These collaborations offer suppliers who are most often small businesses an opportunity to connect with multiple utilities seeking similar supply partners. The sessions matched Frontier prime suppliers with pre-vetted MWDVLGBTE suppliers recommended for participation by local chambers and community-based organizations. The sessions included discussions of prime contractor requirements and contracting opportunities for MWDVLGBTE suppliers.
- Frontier continues to encourage its prime suppliers to include WMDVLGBTBE's in their subcontracting activities and report on their results. We encouraged our vendors to report Tier 2 spend on a quarterly basis. The implementation of technology has dramatically increased our visibility and control over the program.
- In 2020 Frontier was a member of the Advisory Council for the following organizations:
  - American Indian Chamber of Commerce
  - Veterans in Business
  - The Asian Business Association
  - The Latin Business Association
- Established a subcommittee to provide informational updates and maintain communications to support the supplier community via our Supplier Sessions.

The following are some of the virtual sessions Frontier sponsored or participated in across the state.

- Frontier partnered with the Asian Business Association – Los Angeles on its “Women Business Pioneers Symposium” designed to celebrate the achievements of Asian American women, and to provide an opportunity to learn from successful female businesswomen.
- California CA-Asian Chamber Small Biz workshop.
- CPUC/ Joint Utilities Small Business EXPO.
- Frontier participated in the American Indian Chamber of Commerce of California's Annual conference.
- Frontier was the premier sponsor of the Black Business Association's Procurement Summit Series, Salute to Black Women, Celebration of Black History as well as monthly COvid-19 supplier updates.



- Joint Utilities and All Community Based Public Comment Meeting.
- CPUC Annual EnBanc public hearings
- CPUC/Joint utilities/LGBTQ+ CBO goal creation workshop Part 1 & Part 2.
- In 2020, for the 2<sup>nd</sup> year Frontier partnered with the Latin Business Association (“LBA”) on its “Supplier Diversity Procurement Boot Camp.” The boot camp offers hands on training on the key elements of what it takes to develop and sustain a high-performance business.
- Frontier partnered with the National Asian American Coalition on its “16th Annual Economic Development & Empowerment Conference.” The conference focused on small business innovations and growth challenges.
- Frontier partnered with Veterans in Business on its Annual National Convention. Over 800 veteran businesses, corporations, and government agencies were in attendance virtually. This two-day conference featured motivational speakers, exhibitors, workshops and networking. Frontier was recognized as a leader and supporter of the Veterans in Business and presented one of the Battle Buddy award for support to the organization throughout 2020.

9.1.2 WMDVLGBTBE Annual Results by Ethnicity

		ATTACHMENT C			Page 2	
Name of Utility		2020 of Report			G.O. #156 Sec. 9.1.2	
WMDVLGBTBE Annual Results by Ethnicity						
		2020 of Report				
		Direct	Sub	Total \$	%	
1	Minority Male	Asian Pacific American	\$4,560,114	\$64,050	\$4,624,164	2.54%
2		African American	\$1,501,021	\$1,565,176	\$3,066,197	1.68%
3		Hispanic American	\$14,247,468	\$11,083	\$14,258,551	7.84%
4		Native American	\$8,073	\$0	\$0	0.00%
5		Total Minority Male	\$20,316,676	\$1,640,309	\$21,956,985	12.06%
6	Minority Female	Asian Pacific American	\$101,245	\$554,547	\$655,792	0.36%
7		African American	\$0	\$0	\$0	0.00%
8		Hispanic American	\$6,331,337	\$4,526,058	\$10,857,395	5.96%
9		Native American	\$0	\$0	\$0	0.00%
10		Total Minority Female	\$6,432,582	\$5,080,605	\$11,513,187	6.32%
11	Total Minority Business Enterprise (MBE)		\$26,749,258	\$6,720,914	\$33,470,172	18.40%
12	Women Business Enterprise (WBE)		\$25,842,496	\$13,242,447	\$39,084,943	21.48%
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		\$0	\$0	\$0	0.00%
14	Disabled Veteran Business Enterprise (DVBE)		\$1,720,285	\$1,638,009	\$3,358,294	1.84%
15	Other 8(a)*		\$0	\$106,164	\$106,164	0.05%
16	<b>TOTAL WMDVLGBTBE</b>		<b>\$54,312,039</b>	<b>\$21,707,534</b>	<b>76,019,573</b>	<b>41.78%</b>
17	<b>Net Procurement**</b>		<b>\$ 181,920,464</b>			
NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE ** NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS Direct - DIRECT PROCUREMENT Sub - SUBCONTRACTOR PROCUREMENT % - PERCENTAGE OF NET PROCUREMENT						

# Frontier Communications

Name of Utility		2020 of Report				G.O. #156 Sec. 9.1.2			
WMDVLGBTBE Direct Procurement by Product and Service Categories									
				Products		Services		Total	
				\$	%	\$	%	\$	%
1	Minority Male	Asian Pacific American	Direct	4,398,392	2.40%	\$161,722	0.08%	4,560,114	2.48%
2		African American	Direct	787,231	0.43%	\$713,790	0.39%	1,501,021	0.82%
3		Hispanic American	Direct	0	0.00%	\$14,247,468	7.83%	14,247,468	7.83%
4		Native American	Direct	8,073	0.00%	\$0	0.00%	8,073	0.00%
5		Total Minority Male	Direct	5,193,696	2.85%	\$15,122,980	8.31%	20,316,676	11.16%
6	Minority Female	Asian Pacific American	Direct	0	0.00%	\$101,245	0.05%	101,245	0.05%
7		African American	Direct	0	0.00%	\$0	0.00%	0	0.00%
8		Hispanic American	Direct	1,308,792	0.72%	\$5,022,545	2.76%	\$6,331,337.00	3.48%
9		Native American	Direct	0	0.00%	\$0.00	0.00%	0	0.00%
10		Total Minority Female	Direct	1,308,792	0.72%	\$5,123,790	2.81%	6,432,582	3.53%
11	Total Minority Business Enterprise (MBE)		Direct	\$6,502,488	3.58%	\$20,246,770	11.12%	\$26,749,258	14.70%
12	Women Business Enterprise (WBE)		Direct	\$8,573,468	4.71%	\$17,269,028	9.49%	\$25,842,496	14.20%
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		Direct	\$0		\$0		\$0	0.00%
14	Disabled Veteran Business Enterprise (DVBE)		Direct	\$0		\$1,720,285	0.95%	\$1,720,285	0.95%
15	Other 8(a)*		Direct	\$0		\$0		\$0	0.00%
16	<b>TOTAL WMDVLGBTBE</b>		<b>Direct</b>	<b>\$15,182,120</b>		<b>\$39,236,083</b>		<b>\$54,312,039</b>	<b>29.85%</b>
17	<b>Total Product Procurement</b>			<b>\$15,182,120</b>					
18	<b>Total Service Procurement</b>					<b>\$39,236,083</b>			
19	<b>Net Procurement**</b>			\$	181,920,464				
20	<b>Total Number of WMDVLGBTBEs that Received Direct Spend</b>				69				

NOTE: \* FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE  
 \*\* NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS  
 Direct - DIRECT PROCUREMENT  
 Sub - SUBCONTRACTOR PROCUREMENT  
 %- PERCENTAGE OF NET PROCUREMENT

# Frontier Communications

Name of Utility		2020 of Report				G.O. #156 Sec. 9.1.2			
WMDVLGBTBE Subcontractor Procurement by Product and Service Categories									
				Products		Services		Total	
				\$	%	\$	%	\$	%
1	Minority Male	Asian Pacific American	Sub	0	0.00%	\$64,050	0.03%	64,050	0.03%
2		African American	Sub	1,540,765	0.85%	\$24,411	0.01%	1,565,176	0.86%
3		Hispanic American	Sub	0	0.00%	\$1,530	0.00%	1,530	0.00%
4		Native American	Sub	0	0.00%	\$0	0.00%	0	0.00%
5		Total Minority Male	Sub	1,540,765	0.85%	\$89,991	0.04%	1,630,756	0.89%
6	Minority Female	Asian Pacific American	Sub	437,190	0.24%	\$117,357	0.06%	554,547	0.30%
7		African American	Sub	0	0.00%	\$0	0.00%	\$0.00	0.00%
8		Hispanic American	Sub	\$1,419,305	0.78%	\$3,106,753	1.71%	4,526,058	2.49%
9		Native American	Sub	0	0.00%	\$0	0.00%	0	0.00%
10		Total Minority Female	Sub	1,856,495	1.02%	\$3,224,110	1.77%	5,080,605	2.79%
11	Total Minority Business Enterprise (MBE)		Sub	\$3,397,260	1.87%	\$3,314,101	1.82%	6,711,361	3.69%
12	Women Business Enterprise (WBE)		Sub	\$4,532,868	2.49%	\$7,242,422	3.98%	11,775,290	6.47%
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		Sub	\$0.00		\$0.00		0	0.00%
14	Disabled Veteran Business Enterprise (DVBE)		Sub	\$0.00		\$1,357,124		1,357,124	0.74%
15	Other 8(a)*		Sub	\$0.00		\$106,164		106,164	0.05%
16	<b>TOTAL WMDVLGBTBE</b>		<b>Sub</b>	<b>\$7,930,128</b>		<b>\$12,019,811</b>		<b>19,949,939</b>	<b>10.96%</b>
17	<b>Total Product Procurement</b>			\$7,930,128					
18	<b>Total Service Procurement</b>			\$12,019,811					
19	<b>Net Procurement**</b>			\$ 181,920,464					

NOTE: \* FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE  
 \*\* NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS  
 Direct - DIRECT PROCUREMENT  
 Sub - SUBCONTRACTOR PROCUREMENT  
 % - PERCENTAGE OF NET PROCUREMENT

# Frontier Communications

Frontier Communications	2020 of Report	G. O. #156 Sec 9.1.2
WMDVLGBTBE Procurement by Standard Industrial Categories		

SIC Category	Asian Pacific American		African American		Hispanic American		Native American		Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	Other 8(a)**	Total WMDVLGBTBE	Total Dollars
	Male	Female	Male	Female	Male	Female	Male	Female							
Category 15 - Building Construction - General Construction, Operative Builders	\$ 4,398,392				\$14,247,468				\$18,645,860	\$ 12,387,690				\$31,033,550	\$ 31,033,550
	% 2.41%				% 7.83%				% 10.24%	% 6.80%				% 17.05%	% 17.05%
Category 47 - Transportation Services	\$														
	%														
Category 48 - Business Consulting Services, Not Elsewhere Classified	\$	\$101,245							\$101,245					\$101,245	\$ 101,245
	%	% 0.05%							% 0.05%					% 0.05%	% 0.05%
Category 75 - Repair and Service	\$														
	%														%
Category 73- Business Services	\$									\$1,097,867				\$1,097,867	\$ 1,097,867
	%									% 0.60%				% 0.60%	% 0.60%
Category 72 - Logistics & Shipping	\$	\$161,722							\$ 161,722	\$8,573,468				\$8,735,190	\$ 8,735,190
	%	% 0.08%							% 0.08%	% 4.71%				% 4.80%	% 4.80%
Category 87 - Facilities	\$				\$3,013,527				\$3,013,527					\$3,013,527	\$ 3,013,527
	%				% 1.66%				% 1.66%					% 1.66%	% 1.66%
Category 36 - Engineering & Maintenance Services	\$		\$713,790		\$2,009,018		\$8,073		\$2,730,881	\$7,383,471		\$1,720,285		\$11,834,637	\$ 11,834,637
	%		% 0.39%		% 1.10%		% 0.0%		% 1.50%	% 4.05%		% 0.95%		% 6.50%	% 6.50%
Category 37- Auto Supplies	\$		\$787,231						\$787,231					\$787,231	\$ 787,231
	%		% 0.43%						% 0.43%					% 0.43%	% 0.43%
Category 42 - Prof Equipment and Supplies	\$				\$1,308,792				\$1,308,792					\$1,308,792	\$1,308,792
	%				% 0.71%				% 0.71%					% 0.7%	% 0.71%
<b>TOTAL</b>	\$	\$4,560,114	\$101,245	\$1,501,021	\$0	\$14,247,468	\$6,331,337	\$ 8,073	\$26,749,258	\$25,842,496		\$1,720,285		\$54,312,039	\$ 54,312,039
	%	% 2.51	% 0.05	% 0.82	% 0	% 7.83	% 3.48	% 0	% 14.70%	% 14.20%	% 0	% 95.00%		% 29.85%	% 29.85%

Total Product Procurement	\$15,182,120
Total Service Procurement	\$39,236,083

Net Procurement***	\$181,920,464
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NOTE: \*\*FIRMS WITH MULT MINORITY OWNERSHIP STATUS

\*\*FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE

\*\*\*NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS

TOTAL DOLLARS - TOTAL PROCUREMENT DOLLAR AMOUNT IN THE SPECIFIC SIC CATEGORY

% - PERCENTAGE OF TOTAL DOLLARS

# Frontier Communications

Frontier Communications	2020 of Report	G. O. #156 Sec 9.1.2 (D.11-05-019 & D.06-11-028)
Number of WMDVLGBTBE Suppliers and Revenue Reported to the Clearinghouse		

Data on Number of Suppliers												
# WMDVLGBTBEs	Revenue Reported to CHS						Utility-Specific 2020 Summary					
	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total
Under \$1 million	5	0	0	4	0	9	5	2	0	4	0	11
Under \$5 million	11	23	0	3	0	37	11	13	0	3	0	27
Under \$10 million	2	7	0	2	0	11	7	2	0	2	0	11
Above \$10 million	2	10	0	0	0	12	13	10	0	0	0	23
<b>TOTAL</b>	<b>20</b>	<b>40</b>	<b>0</b>	<b>9</b>	<b>0</b>	<b>69</b>	<b>36</b>	<b>27</b>	<b>0</b>	<b>9</b>	<b>0</b>	<b>69</b>

Revenue and Payment Data												
WMDVLGBTBE \$M	Revenue Reported to CHS						Utility-Specific 2020 Summary					
	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total	MBE	WBE	LGBTBE	DVBE	Other 8(a)*	Grand Total
Under \$1 million	\$ 4,368,188	0	0	\$482,001	0	\$ 4,368,188	\$ 1,532,058	\$ -	\$ -	\$ -	\$ -	\$ -
Under \$5 million	\$ 34,768,817	\$ 98,716,500	0	\$7,793,283	0	\$ 133,485,317	\$ 19,020,847	\$ 13,088,674	\$ -	\$ 2,162,553	\$ -	\$ 133,485,317
Under \$10 million	\$ 65,297,620	\$ 35,527,537	0	\$10,348,578	0	\$ 100,825,157	\$ 446,748	\$ 12,243,051	\$ -	\$ 7,830,240	\$ -	\$ -
Above \$10 million	\$ 630,608,265	\$ 498,202,900	0	0	0	\$ 945,149,967	\$ 7,640,392	\$ 1,186,802	\$ -	\$ -	\$ -	\$ -
<b>TOTAL</b>	<b>\$ 695,905,885</b>	<b>\$ 632,446,937</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>\$ 1,183,828,629</b>	<b>\$ 28,640,045</b>	<b>\$ 26,518,527</b>	<b>\$ -</b>	<b>\$ 9,992,793</b>	<b>\$ -</b>	<b>\$54,312,039</b>

NOTE: \* FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE  
 CHS: SUPPLIER CLEARINGHOUSE

**Frontier Communications**

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<b>Frontier Communications</b>	<b>2020</b>	<b>G.O. #156 Sec. 9.1.2</b>
<b>Description of WMDVLGBTBEs with CA Majority Workforce</b>		

This information is not readily accessible and is not tracked by Frontier.

Name of Utility	2020 of Report	G.O. #156 Sec. 9.1.3	
<b>WMDVLGBTBE Program Expenses</b>			

Expense Category	Year (Actual)
Wages	\$250,000
Other Employee Expenses	\$0
Program Expenses	\$7,500
Reporting Expenses	\$89,000
Training	\$0
Consultants	\$0
Sponsorships	\$80,000
<b>TOTAL</b>	<b>\$426,475</b>

The following is a summary of Frontier’s WMDVLGBTBE program expenses incurred in 2020.



**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**

In 2020, Frontier spent (40.08%) of its procurement dollars with women, minority, and disabled veteran owned business enterprises. Frontier exceeded the GO 156 diversity spend goals for women and minority owned business enterprises. In 2020, Frontier's MWDVLGBTBTE spend increase in 2<sup>nd</sup> tier in this area of historic spend by the needs of the business. Specifically, in contingent labor, operations and equipment distribution. Frontier understands that all supply chains are impacted by many factors to include but not limited to global financial, socio-economic and supply annually but we are confident that our diversity spend will grow as we work to stabilize our MWDVLGBTBTE base of suppliers for 2020 and beyond.

Frontier closely monitored progress and took additional steps to meet its WMDVLGBTBTEs goals through the procurement opportunities associated with construction, outside plant and materials management. Frontier's supplier diversity team led a strategic cross-functional effort to identify key focus areas. The team targeted large and small Request for Proposals ("RFP") across the various products/services that had California spend impact. Some of these products and services included fiber optic cable, inside wire, network construction, and fiber to the premises ("FTTP"). The supplier diversity team worked directly with cross-functional teams to ensure that WMDVLGBTBTE suppliers were considered for every opportunity.

The 2020 reported WMDVLGBTBTEs overall expenditures of \$74,261,978 represents a year over year increase in WMDVLGBTBTEs spend to the levels of our spend in 2018 extended growth. Although we have been working through our chapter 11 restructure process with anticipated final emergence late March, we have continued to focus on maintaining and growing our overall diversity spend. Once again late in 2020 Frontier as well as many utilities were impacted by the sale of one our diverse suppliers also utilized by the JU, they liquidated part of their ownership reducing our forecasted spend. Although unfortunate for the utilities it is a measure of success for our supplier and we wish them well. One of the primary goals of the program is to assist in the growth of diverse businesses, and this is a natural byproduct of business successes. Frontier is encouraged by the success of many businesses and remain steadfast in our commitment to provide opportunities for diverse businesses to succeed.

**9.1.5 DESCRIPTION OF PRIME CONTRACTOR UTILIZATION OF WMDVLGBTBE SUBCONTRACTORS**

Frontier’s supply chain/strategic sourcing department continued to focus on second tier spend that provided a direct means to increase contracting opportunities for WMDVLGBTBEs through prime supplier engagement.

Frontier’s supply chain/strategic sourcing continues to review and renegotiated grandfathered agreements to ensure diversity clauses are included in applicable supplier agreements. We also requested that new suppliers certify WMDVLGBTBE status during initial registration via our online portal. Frontier’s supply chain/strategic sourcing department also worked with prime suppliers to ensure utilization of diverse suppliers and to ensure they meet their utilization requirements. In addition, Frontier encouraged prime suppliers to explore areas of opportunity and expansion of WMDVLGBTBEs.

<b>Category</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
<b>WMDVLGBTBE</b>	<b>\$52,510,165</b>	<b>\$80,824,211</b>	<b>\$79,351,274</b>	<b>\$65,723,894</b>	<b>\$74,261,978</b>
<b>MBE Total</b>	<b>\$34,284,530</b>	<b>\$51,273,093</b>	<b>\$46,537,162</b>	<b>\$33,116,334</b>	<b>\$33,460,619</b>
<b>WBE Total</b>	<b>\$17,535,088</b>	<b>\$27,765,467</b>	<b>\$31,304,265</b>	<b>\$29,387,114</b>	<b>\$37,617,786</b>
<b>DVBE Total</b>	<b>\$661,973</b>	<b>\$1,785,651</b>	<b>\$1,509,847</b>	<b>\$3,220,114</b>	<b>\$3,077,409</b>
<b>LGBT Total</b>	<b>\$28,574</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

# Frontier Communications

Name of Utility	2020 Annual Report							G.O. #156 Sec. 9.1.5
Summary of Prime Contractor Utilization of WMDVLGBTBE Subcontractors								
	Minority Male	Minority Female	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	Other 8(a)*	TOTAL WMDVLGBTBE
<b>Direct \$</b>	\$19,047,927	\$9,557,560	\$28,605,487	\$26,518,527	\$0	\$2,402,793	\$0	\$57,526,807
<b>Subcontracting \$</b>	\$179,246	\$4,331,691	\$4,331,601	\$2,868,919	\$0	\$817,321	\$0	\$8,187,087
<b>Total \$</b>	<b>\$19,227,173</b>	<b>\$13,889,161</b>	<b>\$22,116,334</b>	<b>\$29,387,446</b>	<b>\$0</b>	<b>\$3,220,114</b>	<b>\$0</b>	<b>\$65,723,894</b>
<b>Direct %</b>	9.71%	4.86%	1457.00%	13.52%	0.00%	1.22%	0.00%	29.31%
<b>Subcontracting %</b>	0.09%	2.20%	2.29%	1.27%	0.00%	0.41%	0.00%	4.16%
<b>Total %</b>	<b>9.80%</b>	<b>7.07%</b>	<b>16.87%</b>	<b>14.98%</b>	<b>0.00%</b>	<b>1.63%</b>	<b>0.00%</b>	<b>33.47%</b>
<b>Net Procurement**</b>	<b>\$196,109,399</b>							
NOTE: *FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE								
**NET PROCUREMENT INCLUDES PURCHASE ORDER, NON-PURCHASE ORDER, AND CREDIT CARD DOLLARS								
% - PERCENTAGE OF NET PROCUREMENT								
Direct - DIRECT PROCUREMENT								
Sub - SUBCONTRACTOR PROCUREMENT								

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

Frontier continued its internal appeals process as outlined in GO 156, Section 7, to accept, review and resolve complaints relating to Frontier’s supplier diversity program. Frontier did not receive any formal complaints filed with the CPUC in connection with its program during the 2020 reporting period.

**9.1.7 A DESCRIPTION OF ANY EFFORTS MADE TO RECRUIT WMDVLGBTBe SUPPLIERS OF PRODUCTS OR SERVICES IN PURCHASING CATEGORIES WHERE WMDVLGBTBE UTILIZATION HAS BEEN LOW, SUCH AS LEGAL AND FINANCIAL SERVICES, FUEL PROCUREMENT, AND AREAS THAT ARE CONSIDERED HIGHLY TECHNICAL IN NATURE.**

Frontier continued to focus on areas of low utilization. To identify diverse suppliers in areas of low utilization, Frontier has:

- Searched for WMDVLGBTBE’s within the low utilization categories to make contact and develop relationships that may lead to procurement opportunities.
- Worked actively with other utilities to share ideas on how to identify and solicit new WMDVLGBTBE’s.
- Worked with WMDVLGBTBE’s that are not certified with the Clearinghouse to complete the necessary documentation to become certified.
- Collaborated with the Small Business Association to identify small minority businesses for procurement opportunities.

**9.1.11 WMDVLGBTBE FUEL PROCUREMENT**

Not Applicable

**10.0 2021 ANNUAL PLAN**

**10.1.1 WMDVLGBTBE SHORT-TERM, MID-TERM AND LONG-TERM GOALS**

GO 156, Section 10.1.1 requires that the annual plan include a discussion of the short-, mid- and long-term goals as required by Section 8. Frontier has provided these goals on the attached spreadsheet, with a breakdown by Standard Industrial Classification (“SIC”) Major Group, and Product category, for the utilization of WMDVLGBTBE vendors. Frontier’s goals recognize our continued commitment to provide WMDVLGBTBE’s opportunities.

# Frontier Communications

Frontier	2020 of Report	G.O. #156 Sec. 10.1.1
WMDVLGBTBE Annual SHORT, MID, AND LONG-TERM Goals by Product and Service Category		

	Short-Term 2021					Mid-Term 2022					Long-Term 2023				
	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE
<b>Products</b>															
34. Fabricated Products & Transport Equip	0.00%	1.00%	0.00%	6.00%	7.00%	1.50%	0.00%	0.00%	7.00%	8.50%	2.00%	1.00%	0.00%	10.00%	13.00%
35. Industrial & Computer Machinery	1.20%	0.80%	0.00%	0.00%	2.00%	2.00%	1.00%	0.00%	0.00%	3.00%	2.00%	3.00%	0.00%	0.00%	5.00%
36. Electrical Equipment Components	4.50%	1.50%	0.00%	0.00%	6.00%	4.50%	1.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
38. Measurement Equipment	0.00%	1.00%	0.00%	0.00%	1.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	2.00%
50. Durable Goods	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
51. Wholesale Trade - Nondurable goods	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
<b>Subtotal</b>	<b>5.70%</b>	<b>3.30%</b>	<b>0.00%</b>	<b>6.00%</b>	<b>16.00%</b>	<b>8.00%</b>	<b>2.50%</b>	<b>1.00%</b>	<b>7.00%</b>	<b>18.50%</b>	<b>4.00%</b>	<b>3.00%</b>	<b>2.00%</b>	<b>10.00%</b>	<b>20.00%</b>

	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBE)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE
	<b>Services</b>														
Category 15 - Building Construction - General	6.00%	5.00%	0.50%	2.00%	13.50%	7.00%	5.75%	1.00%	3.00%	16.75%	8.00%	5.75%	1.50%	3.00%	18.25%
Category 47 - Transportation Services	5.00%	0.75%	0.00%	0.00%	5.75%	6.00%	0.00%	0.00%	0.00%	6.00%	7.00%	0.00%	0.00%	0.00%	7.00%
Category 48 - Business Consulting Services, N	3.00%	4.00%	0.00%	1.00%	8.25%	3.25%	4.00%	0.00%	0.00%	7.25%	2.00%	5.00%	1.00%	1.00%	9.00%
Category 75 - Automotive Repair and Service	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Category 73 - Business Services	7.00%	3.00%	0.00%	0.00%	10.00%	8.00%	3.00%	0.00%	0.00%	11.00%	8.50%	4.00%	0.00%	0.00%	12.50%
Category 72 - Logistics & Shipping	4.00%	0.00%	0.00%	0.00%	4.00%	4.75%	0.00%	0.00%	0.00%	4.75%	2.00%	0.00%	0.00%	1.00%	3.00%
Category 87 - Facilities	0.00%	0.00%	0.75%	0.00%	0.75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.25%	0.00%	0.00%	0.25%	0.00%	0.25%	0.00%	0.00%	0.25%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	50.00%
<b>Subtotal</b>	<b>25.00%</b>	<b>12.75%</b>	<b>1.25%</b>	<b>3.00%</b>	<b>42.00%</b>	<b>29.00%</b>	<b>13.00%</b>	<b>1.00%</b>	<b>3.00%</b>	<b>46.00%</b>	<b>29.50%</b>	<b>15.00%</b>	<b>1.50%</b>	<b>4.00%</b>	<b>50.00%</b>

**10.1.2 A DESCRIPTION OF WMDVLGBTBE PROGRAM INTERNAL AND EXTERNAL ACTIVITIES PLANNED FOR THE NEXT CALENDAR YEAR:**

**PLANNED WMDVLGBTBE PROGRAM ACTIVITIES FOR 2021**

Frontier is committed to continuing to strengthen its supplier diversity results. Frontier's supplier diversity team will lead internal and external activities to further develop our program and increase opportunities for WMDVLGBTBEs. A summary of these activities is described below:

**INTERNAL PROGRAM ACTIVITIES**

- Develop and implement strategic plans to increase commitments to existing diverse suppliers and to provide opportunities for suppliers in low utilization areas based on quarterly review forecasting.
- Maintain supplier diversity's participation on cross-functional teams for RFPs and contracts to drive inclusion of diverse suppliers as subcontractors/2nd tier vendors in Frontier procurement opportunities.
- Partner and collaborate with internal business leaders to develop and implement strategies to increase diverse spend.
- Partner with sourcing and strategic prime suppliers to ensure multi-tier diversity inclusion.
- Communicate Frontier's short and long-term supplier diversity related strategic directions to key internal stakeholders.
- Regularly monitor, review and analyze reports to track progress to ensure diversity initiatives are being executed.
- Continue to collaborate with minority and non-minority advocacy organizations and prime contractors to support doing business with and encourage economic development of WMLGBTDVBE's.
- Continue to place high priority to encourage Frontier's prime suppliers to diversify their base of WMLGBTDVBE suppliers and subcontractors and develop relationships that will be mutually beneficial.
- Continue to work with local community-based organizations to identify suppliers as well as the Supplier Clearinghouse database and National Gay & Lesbian Chamber of Commerce to locate LGBTBE suppliers.

**EXTERNAL PROGRAM ACTIVITIES**

Frontier will continue to develop its supplier diversity program, with an emphasis on outreach to the supplier community, web-based tools to allow effective supplier access,

and the development of best practices. Frontier will also closely monitor opportunities to increase spending results, to promote supplier diversity and to meet its objectives, including:

- Work with various chambers of commerce and business associations to conduct one-on-one meetings between WMDVLGBTBE's and Frontier's sourcing leaders to discuss both current opportunities in California and general Frontier requirements for the applicable product or service.
- Participate in local, regional and national supplier diversity events such as: conferences, forums, symposiums, trade fairs and workshops to build awareness of Frontier's procurement requirements by participating in business matchmaking and one-on-one supplier meetings.
- Work closely with prime suppliers to ensure they meet their 2nd tier utilization requirements and review and expand areas of opportunity for diverse spend.

### **10.1.3 PLANS FOR RECRUITING WMDVLGBTBE VENDORS OF LOW UTILIZED AREAS:**

Frontier will continue to:

- Develop and implement strategic plans to increase commitments to existing diverse suppliers and to provide opportunities for suppliers in low utilization areas.
- Work with community organizations to drive diverse participation in Frontier sourcing opportunities.
- Benchmark with other utilities to identify diverse suppliers in low utilization areas.
- Increase supplier diversity's participation on cross functional teams for RFPs for services that historically have lower levels of diverse spend including alternate sales channels, network electronics and professional services to drive inclusion of diverse suppliers for procurement opportunities.

### **10.1.4 PLANS FOR SEEKING AND/OR RECRUITING WMDVLGBTBE VENDORS IN ANY EXCLUDED CATEGORY AND AREAS WHERE SUPPLIERS ARE CURRENTLY UNAVAILABLE**

The CPUC issued Decision 05-11-024 on November 13, 2005 in which it eliminated the use of exclusions in reporting diversity procurement results. Frontier has not used exclusions in providing this report.

**10.1.5 PLANS FOR ENCOURAGING BOTH PRIME CONTRACTORS AND GRANTEES TO ENGAGE WMDVLGBTBEs IN SUBCONTRACTS IN ALL CATEGORIES WHICH PROVIDE SUBCONTRACTING OPPORTUNITIES**

Frontier will continue to work closely with prime suppliers to encourage them to utilize WMDVLGBTBEs for subcontracting opportunities and review and expand areas of opportunity for diverse spend. In addition, the company's procurement department will make efforts to ensure that a diversity clause requesting suppliers to include WMDVLGBTBE sub-contractors, as appropriate, and report on resulting WMDVLGBTBE activity is part of future agreements.

**10.1.6 PLANS FOR COMPLYING WITH THE WMDVLGBTBE PROGRAM GUIDELINES ESTABLISHED BY PU CODE 8283.**

Frontier will continue its efforts to identify and include as many WMDVLGBTBEs as possible in its procurement activities and to follow the program guidelines established by the CPUC. Frontier's senior procurement department management will continue to actively communicate to their direct reports the need to positively influence WMDVLGBTBE activity and meet Frontier's goals. In addition, we continued our supplier diversity status updates to the docket of our bi-weekly staff meetings within the sourcing organization. This is a time for employees to share opportunities, recent successes and for our director of supplier diversity to share updates on the program.

**Annual Energy Product Results by Ethnicity and WMDVLGBTBE Certification**

Not applicable.

**Annual Power Product Results by Ethnicity and WMDVLGBTBE Certification**

Not applicable.