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March 1, 2022

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 - 2021 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 2021 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 or Dawn Gilbert at dawn.gilbert@ftr.com.

Sincerely,

Charlie Born
Director, Government and External Affairs

cc: Stephanie.Green@cpuc.ca.gov
Dawn Gilbert, Frontier



2021 ANNUAL REPORT AND ANNUAL PLAN

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

**California Public Utilities Commission
March 1, 2022**



2021 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 2021 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 2021, the sixth reporting year since Frontier assumed operation of the landline operations of Verizon California Inc. (U-1002-C) as approved in D.15-12-005. As Frontier enters its sixth year of reporting, our commitment to growing an effective and sustainable strategy in WMDVLGBTQ’s spend has been in the forefront of our evolution. In 2021, Frontier increased our overall base within our California supply chain jumping over 100M compared to 2020 spend as we worked to build Gigabit America maintaining our commitment to MWDVLGBTQ suppliers. Also, in 2021 as the pandemic continued to prohibit large area events of Supplier Diversity and matchmaking heavily attended prior to Covid-19, Frontier in turn expanded virtual outreach by partnering with other Utilities, CBOs and University consortiums. Particularly in 2021, we collaborated with the Council for Supplier Diversity, San Diego State, Golden State Water and California American Water to host the High Performing Supplier Workshops for Diverse Business Enterprises from June through October. This premier capacity building program provided technical assistance and professional development for the selected DBE’s in the region. During this year’s series of events we have maintained supplier relationship and provided capacity building opportunities as we pivoted in our approach. With consistent progress to achieve the GO 156 goals as well as supplier diversity commitments made in the acquisition, we continue to experience growth in our 2nd tier spend with WMDVLGBTQ’s suppliers throughout the supply chain.

With newly energized leadership and board of directors, 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 2021, Frontier maintained its focus on diversity by building stronger bonds with some of the non-traditional CBO’s in the Supplier Diversity community. We offered additional support required in our new virtual environment by providing technology donations of chrome books to our next generation of entrepreneurs. 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 2021 spend with minority business enterprises (“MBE”) and women business enterprises (“WBE”) continues to well 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 (“LGBTQ”) business enterprises with collaborations targeted at developing relationship for future initiatives. In 2021, Frontier continued to collaborate with the Joint Utilities in the efforts to support the LGBTQ goal setting which is formally with under review CPUC. Frontier is committed to reflecting the communities we serve and providing equitable opportunities within our Supply chain

Frontier actively works to support procurement opportunities for WMDVLGBTQs to increase their capacity and grow our supplier diversity program. With the challenges we all have experienced as the coronavirus pandemic effects how we work, communicate and interact with prospective suppliers, Frontier has worked with our Prime Suppliers to provide 2nd tier

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opportunities in areas of growth as we transform to become the first to make a commitment to the growth of Gigabit America. We know that supplier diversity is a journey not a destination and every year has its own challenges.

At Frontier, we realize that supplier diversity requires a focused commitment 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. During the pandemic companies have been acquired, gone out of business or grown at a faster pace than they could have imagined. At Frontier, we strive to support the supplier community and reflect the community we serve through our outreach and throughout our supply chain interactions.

Frontier is committed to continuous improvement in its supplier diversity program, including significant initiatives for 2021 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.

Category	2016	2017	2018	2019	2020	2021
WMDVLGBTBE	\$52,510,165	\$80,824,211	\$79,351,274	\$65,723,894	\$76,011,500	\$113,993,845
MBE Total	\$34,284,530	\$51,273,093	\$46,537,162	\$33,116,334	\$33,462,099	\$56,451,064
WBE Total	\$17,535,088	\$27,765,467	\$31,304,265	\$29,387,114	\$39,084,943	\$53,222,655
DVBE Total	\$661,973	\$1,785,651	\$1,509,847	\$3,220,114	\$3,358,294	\$4,320,126
LGBT Total	\$28,574	\$0	\$0	\$0	\$0	\$0

9.0 2021 ANNUAL REPORT

Frontier Communications	2021	G.O. #156 Sec. 9.1.1
Description of WMDVLGBTBE Program Activities During the Previous Calendar Year		

Frontier is committed to increasing year over year spend with diverse suppliers. In 2021, 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.

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INTERNAL PROGRAM ACTIVITIES

Below are some of the highlights from 2021:

- Frontier collaborated with SoCal Gas for a Meet the Primes event to include representatives from the SBA, CBO's and multiple members of the Joint Utilities.
- 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 communications outlining the importance of and our commitment to supplier diversity.
- Frontier was part of the select committee to review the Supplier Clearinghouse contract, vet the possible suppliers and develop the requirements for the Supplier Clearinghouse RFP in 2022.
- In 2021, again recognized as a foundation supporter of the Veterans in Business Network Frontier provided in-kind support and on-site convention support for their 2021 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 monthly by Strategic Sourcing category leaders to ensure diverse suppliers are included in spend opportunities.
- Although our base grew over 100M in 2021, Frontier increased the overall spend with WMDVLGBTBE Prime Suppliers in 2021 by 33% despite many associated resource constraints due Covid-19 and the stress on the global Supply Chains.

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EXTERNAL PROGRAM ACTIVITIES

- 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 2021 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 Cal Asian Chamber
- Established a subcommittee to provide informational updates and maintain communications to support the supplier community the Joint Utilities.
- In 2021, as we work to provide access and support to MWDVLGBTBTE suppliers, Frontier collaborated with the Cal Asian Chamber of Commerce to offer a "ASK FRONTIER" via their newsletter provide an opportunity to their members reach out with comments, questions and we provided insight to existing supply chain opportunities.
- Frontier Collaborated with Council for Supplier Diversity, California American Water, So Cal Gas and Golden State Water to Sponsor the High-Performance Supplier workshops. Each virtual workshop is primarily facilitated by a University of California, San Diego (UCSD) In these highly interactive workshops, suppliers heard from leading thinkers in organizational strategy, marketing, resource management, financial strategy and business leadership. Participants had extensive opportunity to apply the learning to their companies and to receive feedback from facilitators and like-minded leaders.

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

- California CA-Asian Chamber Small Biz workshop.
- CPUC/ Joint Utilities Small Business EXPO.
- Partnered with SOCAL Gas Technical assistance workshop
- Frontier participated in the American Indian Chamber of Commerce of California's Annual conference.
- In 2021, Frontier continued as a 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
- Frontier partnered with Cal Asian Chamber's virtual Women's Conference

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9.1.2 WMDVLGBTBE Annual Results by Ethnicity

ATTACHMENT C			Page 2			
Name of Utility		2021 of Report		G.O. #156 Sec. 9.1.2		
WMDVLGBTBE Annual Results by Ethnicity						
		2021 of Report				
		Direct	Sub	Total \$	%	
1	Minority Male	Asian Pacific American	\$1,958,080	\$842,973	\$2,801,053	0.95%
2		African American	\$512,112	\$149,745	\$661,857	0.22%
3		Hispanic American	\$43,315,995	\$0	\$43,315,995	14.65%
4		Native American	\$0	\$0	\$0	0.00%
5		Total Minority Male	\$45,786,187	\$992,718	\$46,778,905	15.82%
6	Minority Female	Asian Pacific American	\$0	\$2,279,887	\$2,279,887	0.77%
7		African American	\$0	\$0	\$0	0.00%
8		Hispanic American	\$7,388,926	\$3,346	\$7,392,272	2.50%
9		Native American	\$0	\$0	\$0	0.00%
10		Total Minority Female	\$7,388,926	\$2,283,233	\$9,672,159	3.27%
11	Total Minority Business Enterprise (MBE)		\$53,175,113	\$3,275,951	\$56,451,064	19.10%
12	Women Business Enterprise (WBE)		\$26,833,474	\$26,389,181	\$53,222,655	18.00%
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)		\$0	\$0	\$0	0.00%
14	Disabled Veteran Business Enterprise (DVBE)		\$2,965,908	\$1,354,218	\$4,320,126	1.46%
15	Other 8(a)*		\$0	\$0	\$0	0.00%
16	TOTAL WMDVLGBTBE		\$82,974,495	\$31,019,350	\$113,993,845	38.56%
17	Net Procurement**		\$ 295,576,694			
<small>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</small>						

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ATTACHMENT C

Name of Utility		2021 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	1,741,752	0.59%	\$216,328	0.07%	1,958,080	0.66%
2		African American	Direct	0	0.00%	\$512,112	0.17%	512,112	0.17%
3		Hispanic American	Direct	1,215,557	0.41%	\$42,100,438	14.24%	43,315,995	14.65%
4		Native American	Direct	0	0.00%	\$0	0.00%	0	0.00%
5		Total Minority Male	Direct	2,957,309	1.00%	\$42,828,878	14.49%	45,786,187	15.49%
6	Minority Female	Asian Pacific American	Direct	0	0.00%	\$0	0.00%	0	0.00%
7		African American	Direct	0	0.00%	\$0	0.00%	0	0.00%
8		Hispanic American	Direct	0	0.00%	\$7,388,926	2.50%	\$7,388,926	2.50%
9		Native American	Direct	0	0.00%	\$0.00	\$0	0	0.00%
10		Total Minority Female	Direct	0	0.00%	\$7,388,926	2.50%	7,388,926	2.50%
11	Total Minority Business Enterprise (MBE)	Direct	\$2,957,309	1.00%	\$50,217,804	16.99%	\$53,175,113	17.99%	
12	Women Business Enterprise (WBE)	Direct	\$21,852,729	7.38%	\$4,980,745	1.70%	\$26,833,474	9.08%	
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%	
14	Disabled Veteran Business Enterprise (DVBE)	Direct	\$11,057	0.00%	\$2,954,851	0.99%	\$2,965,908	1.00%	
15	Other 8(a)*	Direct	\$0	0.00%	\$0	0.00%	\$0	0.00%	
16	TOTAL WMDVLGBTBE	Direct	\$24,821,095	8.39%	\$58,153,400	19.67%	\$82,974,495	28.07%	
17	Total Product Procurement							\$24,821,095	
18	Total Service Procurement							\$58,153,400	
19	Net Procurement**							\$ 295,576,694	
20	Total Number of WMDVLGBTBEs that Received Direct Spend								66

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

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ATTACHMENT C

Name of Utility		2021 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	842,973	0.28%	\$0	0.00%	842,973	0.28%
2		African American	Sub	0	0.00%	\$149,745	0.05%	149,745	0.05%
3		Hispanic American	Sub	0	0.00%	\$0	0.00%	0	0.00%
4		Native American	Sub	0	0.00%	\$0	0.00%	0	0.00%
5		Total Minority Male	Sub	842,973	0.28%	\$149,745	0.05%	992,718	0.33%
6	Minority Female	Asian Pacific American	Sub	2,279,887	0.77%	\$0	0.00%	2,279,887	0.77%
7		African American	Sub	0	0.00%	\$0	0.00%	\$0.00	0.00%
8		Hispanic American	Sub	\$3,346	0.00%	\$0	0.00%	3,346	0.00%
9		Native American	Sub	0	0.00%	\$0	0.00%	0	0.00%
10		Total Minority Female	Sub	2,283,233	0.77%	\$0	0.00%	2,283,233	0.77%
11	Total Minority Business Enterprise (MBE)	Sub	\$3,126,206	1.05%	\$149,745	0.05%	3,275,951	1.10%	
12	Women Business Enterprise (WBE)	Sub	\$14,646,507	4.95%	\$11,742,674	3.97%	26,389,181	8.92%	
13	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Sub	\$0.00	0.00%	\$0.00	0.00%	0	0.00%	
14	Disabled Veteran Business Enterprise (DVBE)	Sub	\$0.00	0.00%	\$1,354,218	0.46%	1,354,218	0.46%	
15	Other 8(a)*	Sub	\$0.00	0.00%	\$0	0.00%	0	0.00%	
16	TOTAL WMDVLGBTBE	Sub	\$17,772,713	6.00%	\$13,246,637	4.49%	31,019,350	10.49%	
17	Total Product Procurement		\$17,772,713						
18	Total Service Procurement		\$13,246,637						
19	Net Procurement**	\$	296,415,746						

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	2021 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	\$ 146,735	\$0	\$0	\$0	\$26,102,272	\$7,005,151	\$0	\$0	\$33,254,158	\$450,212	\$0	\$662,419	\$0	\$34,366,789	\$34,366,789
	% 0.04%	0.00%	0.00%	0.00%	8.83%	2.36%	0.00%	0.00%	11.25%	0.15%	0.00%	0.22%	0.00%	11.63%	11.63%
Category 81 - Cable TV services	\$0	\$0	\$0	\$0	\$15,998,166	\$0	\$0	\$0	\$15,998,166	\$8,447,804	\$0	\$0	\$0	\$24,445,970	\$24,445,970
	% 0.00%	0.00%	0.00%	0.00%	5.41%	0.00%	0.00%	0.00%	5.41%	2.86%	0.00%	0.00%	0.00%	8.27%	8.27%
Category 47 - Transportation Services	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,619	\$0	\$0	\$0	\$10,619	\$10,619
	% 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 48 - Business Consulting Services, Not Elsewhere Classified	\$1,950	\$0	\$0	\$0	\$0	\$2,537	\$0	\$0	\$4,487	\$1,440	\$0	\$0	\$0	\$5,927	\$5,927
	% 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 75 - Repair and Service	\$0	\$0	\$5,937	\$0	\$0	\$0	\$0	\$0	\$5,937	\$7,034	\$0	\$0	\$0	\$12,971	\$12,971
	% 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	\$ 335	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$335	\$ 13,135,466	\$0	\$0	\$0	\$ 13,135,801	\$ 13,135,801
	% 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.44%	0.00%	0.00%	0.00%	4.44%	4.44%
Category 72 - Logistics & Shipping	\$0	\$0	\$0	\$0	\$6,085	\$0	\$0	\$0	\$6,085	\$3,617,255	\$0	\$0	\$0	\$3,623,340	\$3,623,340
	% 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.22%	0.00%	0.00%	0.00%	1.23%	1.23%
Category 94 - HR solutions	\$67,308	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$67,308	\$0	\$0	\$0	\$0	\$67,308	\$67,308
	% 0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.02%	0.02%
Category 87 - Facilities	\$0	\$0	\$354,451	\$0	\$0	\$381,238	\$0	\$0	\$735,689	\$871,084	\$0	\$0	\$0	\$1,606,773	\$1,606,773
	% 0.00%	0.00%	0.12%	0.00%	0.00%	0.13%	0.00%	0.00%	0.25%	0.29%	0.00%	0.00%	0.00%	0.54%	0.54%
Category 36 - Engineering & Maintenance Services	\$0.00	\$0	\$151,724	\$0	\$898,741	\$0	\$0	\$0	\$1,050,465	\$0	\$0	\$10,292	\$0	\$1,060,757	\$1,060,757
	% 0.00%	0.00%	0.05%	0.00%	0.30%	0.00%	0.00%	0.00%	0.36%	0.00%	0.00%	0.00%	0.00%	0.36%	0.36%
Category 37- Auto Supplies	\$0.00	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$174,650	\$174,650
	% 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%	0.05%	0.05%
Category 42 - Prof Equipment and Supplies	\$ 1,741,752	\$0	\$0	\$0	\$310,731	\$0	\$0	\$0	\$2,052,483	\$117,910	\$0	\$2,293,197	\$0	\$4,463,590	\$4,463,590
	% 0.59%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.69%	0.03%	0.00%	0.77%	0.00%	1.51%	1.51%
TOTAL	\$ 1,958,080	\$0	\$512,112	\$0	\$43,315,995	\$7,388,926	\$ -	\$0	\$53,175,113	\$26,833,474	\$0	\$2,965,908	\$0	\$82,974,495	\$82,974,495
	% 0.66%	0.00%	0.17%	0.00%	14.65%	2.50%	0.00%	0.00%	17.99%	9.08%	0.00%	1.00%	0	28.07%	28.07%

Total Product Procurement	\$24,821,095
Total Service Procurement	\$58,153,400
Net Procurement***	\$295,576,694

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

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ATTACHMENT C												
Frontier Communications			2021 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	0	0	1	0	6
Under \$5 million	11	23	0	3	0	37	11	6	0	1	0	27
Under \$10 million	2	7	0	2	0	11	7	12	0	1	0	11
Above \$10 million	2	10	0	0	0	12	13	8	0	5	0	23
TOTAL	26	76	0	24	0	69	16	26	0	9	0	66
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	\$66,726,505	0	\$17,793,283	0	\$71,094,693	1,215,557	\$ 1,433,567	\$ -	\$ -	\$ -	\$ 2,649,124
Under \$5 million	\$34,768,817	\$98,716,500	0	\$17,793,283	0	\$151,278,600	1,741,752	\$9,366,474	\$ -	\$ -	\$ -	\$ 10,119,283
Under \$10 million	\$65,297,620	\$235,527,537	0	\$4,500,976	0	\$305,326,133	\$ 8,117,366	\$4,880,740	\$ -	\$ 1,498,387	\$ -	\$ 14,596,498
Above \$10 million	\$330,608,265	\$498,290,067	0	\$15,603,283	0	\$844,501,615	\$42,100,438	\$ 12,052,688	\$ -	\$ 1,456,464	\$ -	\$ 55,609,590
TOTAL	\$435,042,890	\$899,260,609	0	\$37,697,542	0	\$1,372,201,041	\$ 53,175,113	\$ 26,833,474	\$ -	\$ 2,965,908	\$ -	\$82,874,495
NOTE: * FIRMS CLASSIFIED AS 8(a) OF SMALL BUSINESS ADMINISTRATION INCLUDES NON-WMDVLGBTBE												
CHS: SUPPLIER CLEARINGHOUSE												

Frontier Communications

Frontier Communications	2021	G.O. #156 Sec. 9.1.2
Description of WMDVLGBTBEs with CA Majority Workforce		

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

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 2021, Frontier spent 38.56% 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 2021, Frontier's MWDVLGBTE spend increase in 2nd tier in this area of historic spend based on the needs of the business. The issues surrounding the Global Supply and the demand for service provided a perfect storm to grow our spend by over \$100M but many times expanded the spend with existing suppliers. With that being said, 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 MWDVLGBTE base of suppliers for 2022 and beyond.

Frontier closely monitored progress and took additional steps to meet its WMDVLGBTBEs 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 WMDVLGBTBE suppliers were considered for every opportunity.

The 2021 reported WMDVLGBTBEs overall expenditures of \$113,993,845 represents a year over year increase in WMDVLGBTBEs spend to the levels of our spend in 2018 extended growth. In 2021, we entered a new stage in our corporate journey with the leadership of our committed Chief Executive Officer Nick Jeffrey. Nick truly believes that the we must reflect and support the communities we serve at every level. We will be kicking off our national diversity program in 2022. As many of our diverse suppliers have grown and been acquired over the last few years, we consider that our greatest success when a supplier can no longer be counted as diverse due their success. 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. As Diversity is key to the success of all smart businesses.

Commented [BC1]: Do you want to mention he was on panel last year

Frontier Communications

ATTACHMENT C

Name of Utility	2021 of Report	G.O. #156 Sec. 9.1.4
WMDVLGBTBE Results and Goals		

Category	2020 Results	2020 Goals
Minority Men	15.82%	10.00%
Minority Women	3.37%	5.00%
Minority Business Enterprise (MBE)	19.10%	5.00%
Women Business Enterprise (WBE)	18.00%	5.00%
Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	0.00%	0.00%
Disabled Veteran Business (DVBE)	1.46%	1.50%
SBA	0.00%	0.00%
TOTAL WMDVLGBTBE	38.56%	26.50%

% - PERCENTAGE OF NET PROCUREMENT

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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.

Frontier Communications

ATTACHMENT C								
Name of Utility	2021 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
Direct \$	\$45,786,187	\$7,388,926	\$53,175,113	\$26,833,474	\$0	\$2,965,908	\$0	\$82,974,495.00
Subcontracting \$	\$992,718	\$2,283,233	\$3,275,951	\$26,389,181	\$0	\$1,354,218	\$0	\$31,019,350.00
Total \$	\$46,778,905	\$9,672,159	\$56,451,064	\$53,222,655	\$0	\$4,320,126	\$0	\$113,993,845.00
Direct %	15.49%	2.50%	17.99%	9.08%	0.00%	1.00%	0.00%	28.07%
Subcontracting %	0.33%	0.77%	1.10%	8.92%	0.00%	0.46%	0.00%	10.49%
Total %	15.82%	3.27%	19.10%	18.00%	0.00%	1.46%	0.00%	38.56%
Net Procurement**	\$295,576,694							
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								

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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 2021 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 2022 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.

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ATTACHMENT C

Frontier		2021 of Report										G.O. #156 Sec. 10.1.1			
WMDVLGBTBE Annual SHORT, MID, AND LONG-TERM Goals by Product and Service Category															
	Short-Term 2022					Mid-Term 2023					Long-Term 2024				
	Minority Business Enterprise (MBC)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBC)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBC)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE
Products															
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%	2.00%	0.00%	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%
Subtotal	5.70%	3.30%	0.00%	6.00%	16.00%	8.00%	2.50%	1.00%	7.00%	18.50%	4.00%	3.00%	2.00%	10.00%	20.00%

	Short-Term 2022					Mid-Term 2023					Long-Term 2024				
	Minority Business Enterprise (MBC)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBC)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE	Minority Business Enterprise (MBC)	Women Business Enterprise (WBE)	Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE)	Disabled Veterans Business Enterprise (DVBE)	WMDVLGBTBE
Services															
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 79 - 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%	0.25%	0.25%	0.25%	0.25%	0.00%	0.25%	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%	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%
Subtotal	25.00%	12.75%	1.25%	3.00%	42.00%	29.00%	13.00%	1.00%	3.00%	46.00%	29.50%	15.00%	1.50%	4.00%	50.00%

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

PLANNED WMDVLGBTBE PROGRAM ACTIVITIES FOR 2022

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

- Establish National Supplier Diversity Programs effectively focusing on California, Florida, Texas, and New York, states with current regulatory commitments to WMDVLGBTBE supplier spend.
- Update national contract language to reflect corporate commitment to Supplier Diversity.
- 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.
- Collaborate with National and local CBO's to build greater inroads to the Minority Women owned business community with focus on construction and engineering services.
- 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.

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- 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.

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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 GRANTEEES 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.