

March 3, 2025

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 – 2024 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 2024 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 jenny.smith@ftr.com or Dawn Gilbert at dawn.gilbert@ftr.com.

Sincerely,

Jenny Smith
Director, Government and External Affairs

cc: Stephanie.Green@cpuc.ca.gov

Dawn Gilbert, Director of Strategic Sourcing Frontier

2024 ANNUAL REPORT AND ANNUAL PLAN

**WOMEN, MINORITY, DISABLED, VETERAN, LGBT and
SMALL OWNED BUSINESS ENTERPRISES**

**California Public Utilities Commission
March 3,2025**



2024 ANNUAL REPORT AND ANNUAL PLAN

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9.1.1 Description of Diverse Program Activities During the Previous Calendar Year

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 2024 Annual Report and Annual Plan in compliance with General Order 156 (“GO 156”) of the California Public Utilities Commission (“CPUC”). Each of the reporting items required by Section 9.0 and 10.0 of GO 156 are addressed herein below.

INTERNAL PROGRAM ACTIVITIES

At Frontier we recognize that our success is deeply connected to the communities we serve. We are committed to fostering a program that reflects our customers, partners and stakeholders. Our commitment is about creating sustainable opportunities leveraging the strength of different perspectives and building an ecosystem where businesses of all backgrounds can thrive. Frontier actively engages in supplier diversity and capacity building through the following activities:

1. Regular Monitoring and Analysis:
 - Regularly monitor procurement spend data.
 - Analyze spending patterns to identify any disproportionate impact on diverse suppliers.
2. Supplier Scorecards:
 - Develop supplier scorecards that include all metrics.
 - Evaluate supplier performance based on established goals and monitor changes over time.
3. Transparency and Reporting:
 - Maintain transparency in procurement processes.
 - Regularly report on metrics and their impact on spending decisions.
4. Audits:
 - Conduct periodic diversity audits to assess the effectiveness of initiatives to comply with GO 156.
 - Ensure that diverse suppliers have equal opportunities in the procurement process.
5. Supplier Outreach and Support:
 - Provide ongoing support and resources to suppliers.
 - Implement programs to help suppliers navigate challenges and succeed.
6. Stakeholder Engagement:
 - Engage with stakeholders, including suppliers and advocacy groups.
 - Solicit feedback and address concerns to ensure fair treatment.
7. Training and Awareness:
 - Provide training to procurement teams on the importance of diversity.
 - Raise awareness about potential biases and ensure fair evaluation processes.
8. Continuous Improvement:
 - Continuously assess and refine strategies based on feedback and outcomes.
 - Adjust procurement processes to address any identified disparities.

Frontier Communications

9. Benchmarking:

- Benchmark the organization's performance against industry standards.
- Identify areas for improvement by comparing with best practices in supplier diversity.

Below are some the internal supplier diversity activities in which Frontier engaged in 2024:

- Engaged Teal book as a technology partner to build our supply base of diverse suppliers to obtain insight in areas of strength, weakness and economic development opportunity throughout the supply chain.
- Frontier continued communicating the importance of including diverse suppliers in the sourcing process to California employees with operations and purchasing responsibilities.
- 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 spending goals 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.

EXTERNAL PROGRAM ACTIVITIES

Frontier's external activities included the following:

- Frontier continues to encourage its prime suppliers to include diverse providers 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 2024 Frontier was a member of the Advisory Council for the following organizations:
 - American Indian Chamber of Commerce
 - Veterans in Business
 - The Asian Business Association
- In 2024, again recognized as a foundation supporter of the Veterans in Business Network, Frontier also provided in-kind support via their mentoring program for the VIB's Veteran 2 Veteran capacity building program and supported the BRAVO mentorship program as one of 5 California utilities to guide mentees over the 6 month program.

The B.R.A.V.O. (Business Readiness And Veteran Optimization) Mentor Protege Program is a business development program specifically designed for veteran-owned businesses • Is a national, 6-month program designed to give veteran- owned businesses an opportunity to be mentored - with up

close, no holds barred access, by esteemed corporate partners and other successful veteran business owners from across the country to build relationships and the know-how crucial in today's competitive business and procurement environment • Businesses will be nurtured at various stages of development, establishing and cultivating mentor/mentee business relationships that will be mutually beneficial for all participants.

- In 2024, Frontier evaluated the viability of mentor protégé programs offered by Community based organizations we found that the Council for Supplier Diversity initiative to be best in class. 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.

The following are some of the Frontier sponsored or participated in across the state in 2024.

- CPUC/ Joint Utilities Small Business EXPO.
- Supported the Asian Business Association International Women's luncheon.
- Participated in the CPUC Fall Expo
- Joint Utilities and All Community Based Public Comment Meeting.
- CPUC Annual En Banc public hearings
- National Diversity Coalition Economic Development Conference
- Supported and Volunteered for the *National VIB Conference*
- Supported as mentor for the VIB Veteran 2 Veteran Cohort

9.1.2 Supplier Diversity Results by Ethnicity

| Supplier Diversity Annual Report and Annual Plan | | | | Page 2 | | | |
|--|--|------------------------------|------------------------------|---------------------------|--------------|------|--|
| Frontier Communications | | Report Year: 2024 | | GO 156 Section 9.1.2 | | | |
| Supplier Diversity Results by Ethnicity | | | | | | | |
| | | | 2024 of Report | | | | |
| | | | Direct Spend ¹ \$ | Sub Spend ² \$ | Total \$ | % | |
| 1 | Minority Male | African American | \$0 | 0 | | 0.0 | |
| 2 | | Asian Pacific American | \$2,036 | \$ 2,250,973 | \$2,253,009 | 2.2 | |
| 3 | | Hispanic American | \$3,325,632 | \$ 1,430,994 | \$4,756,626 | 4.6 | |
| 4 | | Native American | \$1,641 | 0 | \$1,641 | 0.0 | |
| 5 | | Total Minority Male | \$3,329,309 | \$ 3,681,967 | \$7,011,276 | 6.8 | |
| 6 | Minority Female | African American | \$0 | 0 | \$0 | 0.0 | |
| 7 | | Asian Pacific American | \$0 | \$ 1,586,024 | \$1,586,024 | 1.5 | |
| 8 | | Hispanic American | \$2,316,971 | \$ 4,695,807 | \$7,012,778 | 6.8 | |
| 9 | | Native American | \$0 | 0 | \$0 | 0.0 | |
| 10 | | Total Minority Female | \$2,316,971 | \$ 6,281,831 | \$8,598,802 | 8.3 | |
| 11 | Total Minority Business Enterprise (MBE) | | \$5,646,280 | \$ 9,963,798 | \$15,610,078 | 15.1 | |
| 12 | Women Business Enterprise (WBE) | | \$1,169,271 | \$ 17,401,009 | \$18,570,280 | 17.9 | |
| 13 | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | | \$0 | 0 | \$0 | 0.0 | |
| 14 | Disabled Veteran Business Enterprise (DVBE) | | \$18,085 | \$ 121,975 | \$140,060 | 0.1 | |
| 15 | Persons with Disabilities Business Enterprise (PDBE) | | \$0 | 0 | \$0 | 0.0 | |
| 16 | 8(a)* | | \$0 | \$ 58,842 | \$58,842 | 0.0 | |
| 17 | Total Supplier Diversity Spend | | \$6,833,636 | \$ 27,545,624 | \$34,379,260 | 33.1 | |
| 18 | Net Procurement** | | \$ 103,518,244 | | | | |

NOTES:
 * 8(a) - Firms classified as 8(a) by the Small Business Administration include non-WMDVLGBTBDBE. Businesses owned and controlled by persons found to be disadvantaged by the U.S. Small Business Administration pursuant to Section 8(a) of the Small Business Act, as amended (15 U.S.C. 637 (a)) or the U.S. Secretary of Commerce, pursuant to Section 5 of Executive Order 11625 (GO 156 Section 1.3.13).
 ** Net Procurement includes purchase orders, non-purchase orders, and credit card dollars.

¹ Direct - Means Direct Procurement: when a utility directly procures from a supplier.
² Sub - Means Subcontractor Procurement: when a prime contractor, in contract with a utility, procures from a subcontractor to fulfill its contractual obligation(s).
 % - Percentage of Net Procurement.

Totals may not add due to rounding.

9.1.2 Supplier Diversity Direct Procurement by Product and Service Categories

| Supplier Diversity Annual Report and Annual Plan (Direct Spend) | | | | | | | Page 3 | | |
|---|---|------------------------------|--------|----------------|----------------------|--------------|--------|-------------|--------|
| Frontier Communications | | Report Year: 2024 | | | GO 156 Section 9.1.2 | | | | |
| Supplier Diversity Direct Procurement Results by Product and Service Categories | | | | | | | | | |
| | | | | 2024 of Report | | | | | |
| | | | | Product | | Service | | Total | |
| | | | | \$ | % | \$ | % | \$ | % |
| 1 | Minority Male | African American | Direct | 0 | | 0 | 0.00% | \$0 | 0 |
| 2 | | Asian Pacific American | Direct | \$2,036 | 0.00% | 0 | 0.00% | \$2,036 | 0 |
| 3 | | Hispanic American | Direct | \$0 | 0.00% | \$ 3,325,632 | 3.21% | \$3,325,632 | 3.21 |
| 4 | | Native American | Direct | \$1,641 | 0.00% | 0 | 0.00% | \$1,641 | 0 |
| 5 | | Total Minority Male | Direct | \$3,677 | 0.01% | \$ 3,325,632 | 3.21% | \$3,329,309 | 3.22 |
| 6 | Minority Female | African American | Direct | \$0 | 0.00% | 0 | 0.00% | \$0 | 0 |
| 7 | | Asian Pacific American | Direct | \$0 | 0.00% | 0 | 0.00% | \$0 | 0 |
| 8 | | Hispanic American | Direct | \$2,168,427 | 2.09% | \$ 148,544 | 0.14% | \$2,316,971 | 2.23 |
| 9 | | Native American | Direct | \$0 | 0.00% | 0 | 0.00% | \$0 | 0 |
| 10 | | Total Minority Female | Direct | \$2,168,427 | 2.09% | \$ 148,544 | 0.14% | \$2,316,971 | 2.23 |
| 11 | Total Minority Business Enterprise (MBE) | | Direct | \$2,172,104 | 2.10% | \$ 3,474,176 | 3.35% | \$5,646,280 | 5.45 |
| 12 | Women Business Enterprise (WBE) | | Direct | \$1,000,536 | 0.97% | \$ 168,735 | 0.16% | \$1,169,271 | 1.13 |
| 13 | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | | Direct | \$0 | 0.00% | 0 | 0.00% | \$0 | 0 |
| 14 | Disabled Veteran Business Enterprise (DVBE) | | Direct | \$0 | 0.00% | \$ 18,085 | 0.01% | \$18,085 | 0.01 |
| 15 | Persons with Disabilities Business Enterprise (PDBE) | | Direct | \$0 | 0.00% | 0 | 0.00% | \$0 | \$0.00 |
| 16 | 8(a)* | | Direct | \$0 | 0.00% | 0 | 0.00% | \$0 | \$0.00 |
| 17 | Total Supplier Diversity Spend | | Direct | \$3,172,641 | 3.07% | \$ 3,660,996 | 3.52% | \$6,833,636 | 6.59 |
| 18 | Net Procurement** | | | | | 103,518,244 | | | |
| 19 | Net Product Procurement | | | | | 42,669,622 | | | |
| 20 | Net Service Procurement | | | | | 60,848,622 | | | |
| 21 | Total Number of Diverse Direct Suppliers | | | | | | | 9 | |

NOTES:
 * 8(a) - Firms classified as 8(a) by the Small Business Administration include non-WMDVLGBTBDBE. Businesses owned and controlled by persons found to be disadvantaged by the U.S. Small Business Administration pursuant to Section 8(a) of the Small Business Act, as amended (15 U.S.C. 637 (a)) or the U.S. Secretary of Commerce, pursuant to Section 5 of Executive Order 11625 (GO 156 Section 1.3.13).
 ** Net Procurement includes purchase orders, non-purchase orders, and credit card dollars.

1 Direct - Means Direct Procurement: when a utility directly procures from a supplier.
 2 Sub - Means Subcontractor Procurement: when a prime contractor, in contract with a utility, procures from a subcontractor to fulfil its contractual obligation(s).
 % - Percentage of Net Procurement.

Totals may not add due to rounding.

9.1.2 Supplier Diversity Subcontractor Procurement by Product and Service Categories

| Supplier Diversity Annual Report and Annual Plan (Subcontracting Spend) | | | | | | | | | | |
|--|--|------------------------------|-----|---------------|----------------|----------------------|---------|---------------|-------|---|
| Frontier Communications | | Report Year: 2024 | | | | GO 156 Section 9.1.2 | | | | |
| Supplier Diversity Subcontractor Procurement Results by Product and Service Categories | | | | | | | | | | |
| | | | | | 2024 of Report | | | | | |
| | | | | | Product | | Service | | Total | |
| | | | | | \$ | % | \$ | % | \$ | % |
| 1 | Minority Male | African American | Sub | 0 | 0 | 0 | 0 | 0 | 0 | |
| 2 | | Asian Pacific American | Sub | \$ 1,930,875 | 1.86 | \$ 320,098 | 0.30 | \$ 2,250,973 | 2.17 | |
| 3 | | Hispanic American | Sub | 0 | 0 | \$ 1,430,994 | 1.38 | \$ 1,430,994 | 1.38 | |
| 4 | | Native American | Sub | 0 | 0 | 0 | 0 | 0 | 0 | |
| 5 | | Total Minority Male | Sub | \$ 1,930,875 | 1.86 | \$ 1,751,092 | 1.68 | \$ 3,681,967 | 3.55 | |
| 6 | Minority Female | African American | Sub | 0 | 0 | 0 | 0 | 0 | 0 | |
| 7 | | Asian Pacific American | Sub | \$ 77,640 | 0.07 | \$ 1,508,384 | 1.45 | \$ 1,586,024 | 1.52 | |
| 8 | | Hispanic American | Sub | \$ 1,887,544 | 1.82 | \$ 2,808,263 | 2.71 | \$ 4,695,807 | 4.53 | |
| 9 | | Native American | Sub | 0 | 0 | 0 | 0 | 0 | 0 | |
| 10 | | Total Minority Female | Sub | \$ 1,965,184 | 1.89 | \$ 4,316,647 | 4.16 | \$ 6,281,835 | | |
| 11 | Total Minority Business Enterprise (MBE) | | Sub | \$ 3,896,059 | 3.75 | \$ 6,067,739 | 5.86 | \$ 9,963,808 | 9.62 | |
| 12 | Women Business Enterprise (WBE) | | Sub | \$ 8,960,441 | 8.65 | \$ 8,440,568 | 8.15 | \$ 17,401,009 | 16.08 | |
| 13 | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | | Sub | 0 | | 0 | | 0 | 0 | |
| 14 | Disabled Veteran Business Enterprise (DVBE) | | Sub | 0 | 0 | \$ 121,975 | 0.11 | \$ 121,975 | 0.11 | |
| 15 | Persons with Disabilities Business Enterprise (DBE) | | Sub | 0 | | 0 | | 0 | 0 | |
| 16 | 8(a)* | | Sub | \$ 58,842 | | 0 | | \$ 58,842 | 0 | |
| 17 | Total Supplier Diversity Spend | | Sub | \$ 12,915,342 | | \$ 14,630,282 | | \$ 27,545,624 | 26.56 | |
| 18 | Net Procurement** | | \$ | | | 103,518,244.00 | | | | |
| 19 | Net Product Procurement | | \$ | | | 42,669,622 | | | | |
| 20 | Net Service Procurement | | \$ | | | 60,848,622 | | | | |
| 21 | Total Number of Diverse Subcontractors | | | | | | | | 27 | |

NOTES:
 * 8(a) - Firms classified as 8(a) by the Small Business Administration include non-WMDVLGBTBDPE. Businesses owned and controlled by persons found to be disadvantaged by the U.S. Small Business Administration pursuant to Section 8(a) of the Small Business Act, as amended (15 U.S.C. 637 (a)) or the U.S. Secretary of Commerce, pursuant to Section 5 of Executive Order 11625 (GO 156 Section 1.3.13).
 ** Net Procurement includes purchase orders, non-purchase orders, and credit card dollars.

¹ Direct - Means Direct Procurement: when a utility directly procures from a supplier.
² Sub - Means Subcontractor Procurement: when a prime contractor, in contract with a utility, procures from a subcontractor to fulfill its contractual obligation(s).
 % - Percentage of Net Procurement.

Totals may not add due to rounding.

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9.1.2 Supplier Diversity Results By Standard Industry Codes (SIC)

| Supplier Diversity Annual Report and Annual Plan | | | | | | | | | | | | | | | | | Page 5 | |
|--|--|----------------------|------------------------|--------|-------------------|--------|-----------------|--------|----------|--------|------------------------------------|---------------------------------|--|---|---|-------|--------------------------------|-------------------|
| Frontier Communications | | Report Year: 2024 | | | | | | | | | | | | | GO 156 Section 9.1.2 | | | |
| Supplier Diversity Results by Standard Industrial Classification (SIC) Codes | | | | | | | | | | | | | | | | | | |
| SIC Code | The Standard Industrial Classification (SIC) Manual can be found here: SIC Manual Occupational Safety and Health Administration (osha.gov) | | | | | | | | | | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | 8(a)* | Total Supplier Diversity Spend | Total Procurement |
| | African American | | Asian Pacific American | | Hispanic American | | Native American | | Male | Female | | | | | | | | |
| | Male | Female | Male | Female | Male | Female | Male | Female | | | | | | | | | | |
| 8741, Construction Management | \$ 0 | 0% | \$ 1,520 | 0% | \$ 222,668 | 0.63% | \$ 655,901 | 0% | \$ 1,641 | 0% | \$ 880,210 | 0.66% | \$ 689,509 | 0% | \$ 13,225 | 0% | \$ 1,582,944 | \$ 29,088,787 |
| 5063 Equipment Apparatus | \$ 0 | 0% | \$ - | 0% | \$ 10,548 | 0% | \$ 4,895 | 0% | \$ - | 0% | \$ 15,443 | 0.04% | \$ 42,156 | 0% | \$ 4,860 | 0% | \$ 62,459 | \$ 17,934,005 |
| 7373 Information technology | \$ 0 | 0% | \$ - | 0% | \$ 112,424 | 0% | \$ - | 0% | \$ - | 0% | \$ 112,424 | 0.11% | \$ - | 0% | \$ 0 | 0% | \$ 112,424 | \$ 21,544,750 |
| 80022 Fleet Management | \$ 0 | 0% | \$ - | 0% | \$ 147,759 | 0% | \$ - | 0% | \$ - | 0% | \$ 147,759 | 0.14% | \$ 304 | 0% | \$ 0 | 0% | \$ 148,063 | \$ 29,827,349 |
| 1611 - Highway and Street Construction | \$ 0 | 0% | \$ - | 0% | \$ 879,504 | 0.02% | \$ 20,961 | 0% | \$ - | 0% | \$ 900,465 | 0.87% | \$ 10,024 | 0% | \$ 0 | 0% | \$ 910,489 | \$ 12,980,763 |
| 1711 HVAC | \$ 0 | 0% | \$ 516 | 0% | \$ - | 0% | \$ - | 0% | \$ - | 0% | \$ 516 | 0.01% | \$ 11,541 | 0% | \$ 0 | 0% | \$ 11,541 | \$ 11,884,309 |
| 431513 - Facilities Management | \$ 0 | 0% | \$ - | 0% | \$ - | 0% | \$ - | 0% | \$ - | 0% | \$ - | 0% | \$ - | 0% | \$ 0 | 0% | \$ 516 | \$ 71,702,345 |
| 8711- Engineering Services | \$ 0 | 0% | \$ - | 0% | \$ 1,098,857 | 1.06% | \$ - | 0% | \$ - | 0% | \$ 1,098,857 | 1.06% | \$ - | 0% | \$ 0 | 0% | \$ 1,098,857 | \$ 41,500,876 |
| 4731 Transportation of Freight and Cargo | \$ 0 | 0% | \$ - | 0% | \$ - | 0% | \$ - | 0% | \$ - | 0% | \$ - | 0% | \$ 415,737 | 0% | \$ 0 | 0% | \$ 415,708 | \$ 18,990,474 |
| 1731 Telecom installation | \$ 0 | 0% | \$ - | 0% | \$ 853,872 | 1.58% | \$ 1,635,213 | 0% | \$ - | 0% | \$ 2,489,085 | 2.40% | \$ - | 0% | \$ 0 | 0% | \$ 2,489,085 | \$ 116,940,402 |
| Total | \$ | | \$ 2,036 | 0% | \$ 3,325,632 | 3.22% | \$ 2,316,971 | 2.23% | \$ 1,614 | 0% | \$ 5,646,280 | 5.45% | \$ 1,169,271 | 1.13% | \$ 18,085 | 0% | \$ 0 | \$ 372,394,060 |
| Net Procurement** | \$ | 103,518,244.0 | | | | | | | | | | | | | | | | |

9.1.2 Number of Diverse Suppliers and Revenue Reported to the Supplier Clearinghouse.

| Supplier Diversity Annual Report and Annual Plan | | | | | | | | | | | | | | | |
|--|------------------------------------|---------------------------------|--|---|---|------------|----------------------|------------------------------------|---------------------------------|--|---|---|-----------|------------------|----------------------|
| Frontier Communications | | | | | | | | | | | | | | | |
| Report Year: 2024 | | | | | | | | | | | | | | | |
| GO 156 Section 9.1.2 | | | | | | | | | | | | | | | |
| Number of Diverse Suppliers and Revenue Reported to the Supplier Clearinghouse | | | | | | | | | | | | | | | |
| Number of Diverse Suppliers Data | | | | | | | | | | | | | | | |
| Revenue Reported to the Supplier Clearinghouse | | | | | | | | Utility-Specific 2024 Summary | | | | | | | |
| Number of Diverse Suppliers | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | 8(a)* | Total | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | 8(a)* | Total | |
| Under \$1 million | 1 | 2 | 0 | 0 | 0 | 0 | 3 | 4 | 0 | 0 | 0 | 0 | 2 | | |
| Under \$5 million | 4 | 1 | 0 | 2 | 0 | 1 | 7 | 2 | 4 | 0 | 1 | 0 | 1 | | |
| Under \$10 million | 5 | 12 | 0 | 0 | 0 | 1 | 17 | 3 | 3 | 0 | 1 | 0 | 0 | | |
| Above \$10 million | 3 | 4 | 0 | 0 | 0 | 0 | 7 | 5 | 0 | 1 | 0 | 0 | 0 | | |
| Total | 13 | 19 | 0 | 2 | 0 | 2 | 36 | 14 | 12 | 0 | 3 | 0 | 3 | 32 | |
| Revenue and Payment Data | | | | | | | | | | | | | | | |
| Revenue Reported to the Supplier Clearinghouse | | | | | | | | Utility-Specific 2024 Summary | | | | | | | |
| Revenue of Diverse Suppliers | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | 8(a)* | Total | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | 8(a)* | Total | |
| Under \$1 million | \$ 76,723,009 | \$ 111,990,437 | 0 | 0 | 0 | 0 | \$ 188,713,446 | \$ 1,839,200 | \$ 448,912 | 0 | 18085 | 0 | ##### | \$ 2,346,046 | |
| Under \$5 million | \$ 41,875,009 | \$ 458,889,102 | 0 | \$ 19,199,777 | 0 | \$ 450,091 | \$ 520,413,979 | \$ 1,284,338 | \$ 3,009,817 | 0 | 121975 | 0 | \$ 18,993 | \$ 4,435,123 | |
| Under \$10 million | \$ 172,287,601 | \$ 65,070,798 | 0 | \$ 58,754,536 | 0 | 0 | \$ 296,112,935 | \$ 5,376,554 | \$ 11,976,153 | 0 | 0 | 0 | 0 | \$ 11,976,153 | |
| Above \$10 million | \$ 145,549,010 | \$ 330,688,320 | 0 | 0 | 0 | 0 | \$ 16,103,387 | \$ 492,340,717 | \$ 7,109,986 | 0 | 0 | 0 | 0 | \$ 9,670,891 | |
| Total | \$ 436,434,629 | \$ 966,638,657 | 0 | \$ 77,954,313 | 0 | 0 | \$ 16,553,478 | \$ 1,497,581,077 | \$ 15,610,078 | \$ 18,570,280 | 0 | 140060 | 0 | \$ 59,842 | \$ 34,380,260 |

9.1.2 Description of Supplier Workforce

At this time Frontier does not require our Contractors or Subcontractors to provide the specific data requested. We are committed to transparency but also the contractors' right to privacy data.

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

Frontier Communications

9.1.3 Supplier Diversity Program Expense

The following is a summary of Frontier’s supplier diversity program expenses incurred in 2024

| Supplier Diversity Annual Report and Annual Plan | | | | | | | | | | | |
|--|--|--|--|-------------------------|--|------------------|--|----------------------|--|--------|--|
| | | | | | | | | | | Page 8 | |
| Frontier Communications | | | | Report Year: 2024 | | | | GO 156 Section 9.1.3 | | | |
| Supplier Diversity Program Expense | | | | | | | | | | | |
| | | | | Expense Category | | Year 2024 | | | | | |
| | | | | Wages | | 250,000 | | | | | |
| | | | | Other Employee Expenses | | 28,000 | | | | | |
| | | | | Program Expenses | | 50,000 | | | | | |
| | | | | Reporting Expenses | | 19000 | | | | | |
| | | | | Sponsorship Expense | | 0 | | | | | |
| | | | | Consultant Expenses | | 0 | | | | | |
| | | | | Other Expenses | | 7500 | | | | | |
| | | | | Total | | 354,500 | | | | | |

9.1.4 A Description of the Progress in Meeting or Exceeding Set Goals

In 2024, Frontier spent 33.1 % of its procurement dollars with women, minority, and disabled veteran and LGBTQ owned business enterprises. We exceeded the GO 156 diversity spend goals for women and minority owned business enterprises and acknowledge there is much more work to do in the African American, Veteran, Native supplier communities. Although our supplier based was impacted by rising cost, supplier acquisitions by Venture Capital organizations as well as inflation we maintained key supplier initiatives such as the Council for Supplier Diversity capacity building program.

Frontier monitored progress and took additional steps to meet its supplier diversity 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"). As supplier transition to a new consumer product impacted 2nd tier spend and we seek to locate additional suppliers to fulfill the void. The supplier diversity team worked directly with cross-functional teams to ensure that diverse suppliers were considered for every opportunity in 2024.

Frontier Communications

9.1.4 Description of Results Compared to Set Goals

| Supplier Diversity Annual Report and Annual Plan | | |
|--|-------------------|----------------------|
| | | Page 10 |
| Frontier Communications | Report Year: 2024 | GO 156 Section 9.1.4 |
| Supplier Diversity Results Compared to Set Goals | | |
| Category | 2024 Result % | 2024 Goal % |
| Minority Male Business Enterprise | | 7 |
| Minority Female Business Enterprise | | 7 |
| Minority Business Enterprise (MBE) | | 14 |
| Women Business Enterprise (WBE) | | 5 |
| Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | 0 | 1.5 |
| Disabled Veteran Business Enterprise (DVBE) | 0 | 3 |
| Persons with Disabilities Business Enterprise (DBE) | 0 | 2 |
| Total | 33.1 | 25.5 |

9.1.5 Description of Prime and Subcontractor Contractor Utilization

Frontier’s supply chain/strategic sourcing department continued to focus on second tier spend that provided a direct means to increase contracting opportunities for diverse suppliers 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 diverse suppliers.

| | | |
|---|-------------------|----------------------|
| Frontier Communications | Report Year: 2024 | GO 156 Section 9.1.5 |
| New Diverse Prime and Subcontractor Utilization | | |

| Category | New Prime Contractors # | New Subcontractors # |
|--|-------------------------|----------------------|
| Minority Male Business Enterprise | 1 | 1 |
| Minority Female Business Enterprise | 1 | 0 |
| Total Minority Business Enterprise (MBE) | 2 | 1 |
| Women Business Enterprise (WBE) | 0 | 2 |
| Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | 0 | 0 |
| Disabled Veteran Business Enterprise (DVBE) | | 0 |
| Persons with Disabilities Business Enterprise (DBE) | 0 | 0 |
| 8(a) | 0 | 2 |
| Total | 2 | 5 |

NOTES:

* 8(a) - Firms classified as 8(a) by the Small Business Administration include non-WMDVLGBTDBE. Businesses owned and controlled by persons found to be disadvantaged by the U.S. Small Business Administration pursuant to Section 8(a) of the Small Business Act, as amended (15 U.S.C. 637 (a)) or the U.S. Secretary of Commerce, pursuant to Section 5 of Executive Order 11625 (GO 156 Section 1.3.13).
 ** Net Procurement includes purchase orders, non-purchase orders, and credit card dollars.

Direct - Means Direct Procurement: when a utility directly procures from a supplier.
 Sub - Means Subcontractor Procurement: when a prime contractor, in contract with a utility, procures from a subcontractor to fulfill its contractual obligation(s).

Frontier Communications

| Supplier Diversity Annual Report and Annual Plan | | | | | | | | | |
|--|---------------------|---------------------|------------------------------------|---------------------------------|--|---|---|----------------------|--------------------------------|
| | | | | | | | | | Page 13 |
| Frontier Communications | | | | Report Year: 2024 | | | | GO 156 Section 9.1.5 | |
| Summary of Diverse Contractor Utilization | | | | | | | | | |
| Total Prime Contractor Utilization of Diverse Subcontractors | | | | | | | | | |
| | Minority Male | Minority Female | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | 8(a)* | Total Supplier Diversity Spend |
| Direct \$ | \$ 3,329,309 | \$ 2,316,971 | \$ 5,646,280 | \$ 1,169,271 | \$ - | \$ 18,085 | \$ - | \$ - | \$ 6,833,636 |
| Sub \$ | \$ 3,681,967 | \$ 6,281,831 | \$ 9,963,798 | \$ 17,401,009 | \$ - | \$ 121,975 | \$ - | \$ 58,842 | \$ 27,545,624 |
| Total \$ | \$ 7,011,276 | \$ 8,598,802 | \$ 15,610,078 | \$ 18,570,280 | 0 | | | | \$ 34,379,260 |
| Direct % | 3.22 | 2.23 | 5.45 | 1.13 | 0 | 0.01 | 0 | 0 | 6.59 |
| Sub % | 3.55 | 6.09 | 9.63 | 16.8 | 0 | 0.12 | 0 | 0 | 26.56 |
| Total % | 6.8 | 8.3 | 15.1 | 17.9 | 0 | 0.1 | 0 | 0 | 33.1 |
| Net Procurement ** | \$ | | 103,518,244 | | | | | | |

9.1.5 In State Prime Contractor Utilization of Diverse Subcontractors (California Domicile)

At this time Frontier does not require our Contractors or Subcontractors to provide the specific data requested. We are committed to transparency but also the contractors right to privacy data.

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

Frontier Communications

9.1.6 List of Supplier Diversity Complaints and Current Status

Description of Diverse Program Activities During the Previous Calendar Year

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 Supplier Diversity program during the 2024 reporting period.

9.1.7 Description of Efforts to recruit Diverse Suppliers In Low Utilization Categories

To identify diverse suppliers in areas of low utilization, Frontier has:

- Searched for diverse suppliers 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 diverse suppliers.
- Participation in the CPUC Fall and Spring EXPO
- Worked with suppliers 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.

9.1.9-11 Description of Supplier Diversity Activities and Progress in Power Procurement

(Section 9.1-9-1 NOT APPLICABLE TO FRONTIER COMMUNICATIONS - APPLIES DIRECTLY TO THE ENERGY SEGMENT OF CALIFORNIA STATE UTILITIES)

10.1.1 Supplier Diversity Short-Mid- and Long-Term Procurement Goals

| Supplier Diversity Annual Report and Annual Plan | | | | | | | | | | | | | | | | | | |
|--|------------------------------------|---------------------------------|--|---|---|-------------------------------|------------------------------------|---------------------------------|--|---|---|-------------------------------|------------------------------------|---------------------------------|--|---|---|-------------------------------|
| Frontier Communications | | | | | | | | | | | | | | | | | | |
| Report Year: 2024 | | | | | | | | | | | | | | | | | | |
| Supplier Diversity Short-, Mid-, and Long-Term Procurement Goals | | | | | | | | | | | | | | | | | | |
| GO 156 Section 10.1.1 | | | | | | | | | | | | | | | | | | |
| SIC Code | Short-Term 2026 | | | | | | Mid-Term 2027 | | | | | | Long-Term (Year) | | | | | |
| | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | Total Supplier Diversity Goal | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | Total Supplier Diversity Goal | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | Total Supplier Diversity Goal |
| Product | 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% |
| 1731 | 0.00% | 0.00% | 1.00% | 0.00% | 0.00% | 2.00% | 0.00% | 0.00% | 1.00% | 1.00% | 0.00% | 2.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 8741 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 431513 | 2.50% | 0.00% | 0.00% | 0.00% | 0.00% | 2.50% | 2.50% | 0.00% | 0.00% | 0.00% | 2.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 7349 | 0.00% | 0.00% | 0.50% | 2.00% | 1.00% | 3.50% | 0.00% | 0.00% | 0.50% | 2.00% | 1.00% | 3.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 5072 | 4.00% | 3.00% | 0.00% | 0.00% | 0.00% | 7.00% | 4.00% | 3.00% | 0.00% | 0.00% | 0.00% | 7.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 5063 | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 1611 | 3.00% | 0.00% | 0.00% | 0.00% | 0.00% | 3.00% | 3.00% | 0.00% | 0.00% | 0.00% | 0.00% | 3.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 7538 | 0.00% | 0.00% | 0.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 80022 | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% | 1.00% | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% | 1.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 1373 | 14.50% | 3.00% | 2.00% | 4.00% | 1.00% | 23.50% | 14.50% | 3.00% | 2.00% | 4.00% | 2.00% | 24.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| Subtotal | 14.50% | 3.00% | 2.00% | 4.00% | 1.00% | 23.50% | 14.50% | 3.00% | 2.00% | 4.00% | 2.00% | 24.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| SIC Code | Short-Term 2027 | | | | | | Mid-Term 2028 | | | | | | Long-Term (Year) | | | | | |
| | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | Total Supplier Diversity Goal | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | Total Supplier Diversity Goal | Minority Business Enterprise (MBE) | Women Business Enterprise (WBE) | Lesbian, Gay, Bisexual, Transgender Business Enterprise (LGBTBE) | Disabled Veteran Business Enterprise (DVBE) | Persons with Disabilities Business Enterprise (DBE) | Total Supplier Diversity Goal |
| 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% | 0.00% | 0.00% | 0.00% |
| Code 1 | 0.00% | 0.00% | 1.00% | 1.00% | 0.00% | 2.00% | 0.00% | 0.00% | 1.00% | 1.00% | 0.00% | 2.00% | 0.00% | 0.00% | 1.00% | 1.00% | 0.00% | 2.00% |
| Code 2 | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% | 5.00% | 0.00% | 0.00% | 0.00% | 0.00% | 5.00% |
| Code 3 | 2.50% | 0.00% | 0.00% | 0.00% | 0.00% | 2.50% | 2.50% | 0.00% | 0.00% | 0.00% | 0.00% | 2.50% | 2.50% | 0.00% | 0.00% | 0.00% | 0.00% | 2.50% |
| Code 4 | 0.00% | 0.00% | 0.50% | 2.00% | 1.00% | 3.50% | 0.00% | 0.00% | 0.50% | 2.00% | 1.00% | 3.50% | 0.00% | 0.00% | 0.50% | 2.00% | 1.00% | 3.50% |
| Code 5 | 4.00% | 3.00% | 0.00% | 0.00% | 0.00% | 7.00% | 4.00% | 3.00% | 0.00% | 0.00% | 0.00% | 7.00% | 4.00% | 3.00% | 0.00% | 0.00% | 0.00% | 7.00% |
| Code 6 | 0.00% | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% |
| Code 7 | 3.00% | 0.00% | 0.00% | 0.00% | 0.00% | 3.00% | 3.00% | 0.00% | 0.00% | 0.00% | 0.00% | 3.00% | 3.00% | 0.00% | 0.00% | 0.00% | 0.00% | 3.00% |
| Code 8 | 0.00% | 0.00% | 0.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.50% | 0.00% | 0.00% | 0.00% | 0.00% | 0.50% | 0.00% | 0.00% | 0.00% | 0.00% |
| Code 9 | 0.00% | 0.00% | 0.00% | 2.00% | 0.00% | 1.00% | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% | 1.00% | 0.00% | 0.00% | 0.00% | 1.00% | 0.00% | 1.00% |
| Code 10 | 14.50% | 3.00% | 2.00% | 5.00% | 2.00% | 26.50% | 14.50% | 5.00% | 2.00% | 5.00% | 2.00% | 27.50% | 14.50% | 5.00% | 2.00% | 5.00% | 2.00% | 27.50% |
| Subtotal | 14.50% | 3.00% | 2.00% | 5.00% | 2.00% | 26.50% | 14.50% | 5.00% | 2.00% | 5.00% | 2.00% | 27.50% | 14.50% | 5.00% | 2.00% | 5.00% | 2.00% | 27.50% |
| Total | 29.00% | 6.00% | 4.00% | 9.00% | 3.00% | 50.00% | 29.00% | 8.00% | 4.00% | 9.00% | 4.00% | 52.00% | 29.00% | 8.00% | 4.00% | 9.00% | 4.00% | 52.00% |

10.1.2 Description of Diverse Planned Program Activities for the Next Calendar Year

Frontier plans to continue 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 diverse suppliers. 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.
- Collaborate with National and local CBOs 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 diverse suppliers.
- Continue to encourage Frontier's prime suppliers to expand their base of diverse suppliers and subcontractors.
- Continue to work with local community-based organizations to identify diverse suppliers as well as the Supplier Clearinghouse database.

EXTERNAL PROGRAM ACTIVITIES

Frontier plans to 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:

- 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 Diverse Suppliers in Low Utilization Areas

Frontier plans to 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 Recruiting Diverse Suppliers Where 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 Prime Contractors to Subcontract Diverse Suppliers

Frontier plans to continue to work closely with prime suppliers to encourage them to identify and utilize diverse suppliers 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 contract clause requesting suppliers to include diverse sub-contractors, as appropriate, and report on resulting diverse activity is part of future agreements.

10.1.6 Plans for Complying with Diverse Program Guidelines

Frontier plans to continue its efforts to identify and include as many diverse suppliers as possible in its procurement activities and to follow the program guidelines established by the CPUC. Frontier's procurement department management will continue to actively communicate the need to meet Frontier's goals. In addition, we continued our supplier diversity status updates 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.