

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 11, 2023

CA2023-1070

Jenny Smith  
Director, Regulatory and Government Affairs  
Frontier  
9260 East Stockton Blvd  
Elk Grove, CA 95624

**SUBJECT:** Communications Infrastructure Provider (CIP) Audit of Frontier's Tuolumne, Livingston, and Patterson Service Areas

Ms. Smith:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Stephen Lee, Samuel Mandell, and Thomas Roberts of ESRB staff conducted a CIP audit of Frontier's Tuolumne, Livingston, and Patterson Service Areas from May 22, 2023, to May 26, 2023. During the audit, ESRB staff conducted field inspections of Frontier's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations are enclosed.

Please provide a response no later than September 8, 2023, via electronic copy of all corrective actions and preventive measures taken by Frontier to correct the identified violations and prevent the recurrence of such violations and observations.

If you have any questions concerning this audit, please contact Stephen Lee at (916) 661-2353 or [stephen.lee@cpuc.ca.gov](mailto:stephen.lee@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rickey Tse'.

Rickey Tse, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosure: CPUC Audit Findings of Frontier Tuolumne, Livingston, and Patterson Service Areas

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**CPUC AUDIT FINDINGS OF  
FRONTIER - TUOLUMNE, LIVINGSTON, AND PATTERSON SERVICE AREAS  
MAY 22 - 26, 2023**

**I. Records Review**

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- Frontier’s General Order (GO) 95 and GO 128 inspection programs.
- Frontier’s wired and wireless service maps for its Tuolumne, Livingston, and Patterson service areas, as of March 2023.
- Frontier’s Tuolumne, Livingston, and Patterson Inspection Data containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings from January 2018 through January 2023.
- Frontier’s Tuolumne, Livingston, and Patterson Work Order List containing data of facility locations, overhead or underground facility types, identified deficiencies, repair priority levels, corrective action due dates, and work completion dates from January 2018 through January 2023.
- Safety Hazard Notifications Frontier Sent to Third Party Utilities from January 2018 through January 2023.
- Safety Hazard Notifications Frontier Received from Third Party Utilities from January 2018 through January 2023.
- Intrusive pole test and treat inspection records from January 2022 through January 2023.
- New construction projects completed from January 2018 through January 2023.

**II. Records Violations**

ESRB observed the following violations during the record review portion of the audit:

**1. GO 95, Rule 18-B.(1).(a), Maintenance Programs** states in part:

*The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:*

- (i) *Level 1 -- An immediate risk of high potential impact to safety or reliability:*
  - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
- (ii) *Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
  - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the*

*time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

(iii) *Level 3 -- Any risk of low potential impact to safety or reliability:*

- *Take corrective action within 60 months subject to the exception specified below.*

Frontier’s *Frontier California’s Outside Plant Maintenance, Inspection, and Repair Programs* procedure includes the following priority levels:

- *Priority 1: Issues that create an “immediate safety and/or reliability risk with high probability for significant impact.”*
- *Priority 2A: Corrective action must be taken within 6 months for nonconformances that “compromise worker safety” or “create a fire risk and are located in an Extreme High Fire Threat Zone in Southern California (Tier1),”*
- *Priority 2B: Corrective action must be taken within 12 months in a Very High Fire Threat Zone (Tier2)*
- *Priority 2C: Corrective action must be taken within 36 months for all other Level 2 nonconformances.*
- *Priority 3: “Acceptable safety and/or reliability risk” and action should be taken “as appropriate” within 60 months*

ESRB’s review of Frontier’s tickets from January 1, 2018, to January 1, 2023, found that Frontier had 22 late-pending tickets and 28 late-closed tickets.<sup>1</sup> Late-pending tickets are tickets that are still awaiting completion but have exceeded their target due date. Late-closed tickets are tickets that were completed past their target due date. Table 1 below breaks down the late tickets by hazard level, including the total number of late tickets, as well as late-pending and late-closed tickets.

**Table 1: Late Tickets**

<b>Priority Level</b>	<b>Late-Pending Tickets</b>	<b>Late-Closed Tickets</b>	<b>Total Late Tickets</b>
<b>1</b>	0	0	0
<b>2A</b>	1	2	3
<b>2B</b>	21	26	47
<b>2C</b>	0	0	0
<b>3</b>	0	0	0
<b>Total</b>	22	28	<b>50</b>

<sup>1</sup> ESRB obtained the data by analyzing the “Frontier Audit 2023 #7 Ticket Data” Excel sheet.

2. **GO 95, Rule 18-B.(1).(a).(ii), Maintenance Programs** states in part:

*(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*

*• Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

**GO 95, Rule 21.2.D, High Fire-Threat District** states:

*High Fire-Threat District means those areas comprised of the following:*

- (1) Zone 1 is Tier 1 of the latest version of the United States Forest Service (USFS) and CAL FIRE's joint map of Tree Mortality High Hazard Zones (HHZs). (Note: The Tree Mortality HHZs Map may be revised regularly by the USFS and CAL FIRE.)*
- (2) Tier 2 is Tier 2 of the CPUC Fire-Threat Map.*
- (3) Tier 3 is Tier 3 of the CPUC Fire-Threat Map.*

*Note: In accordance with Ordering Paragraph 7 of D.17-01-009, the above-referenced mapping products are available on the Commission's website at: [www.cpuc.ca.gov/FireThreatMap](http://www.cpuc.ca.gov/FireThreatMap)*

Frontier's *Frontier California's Outside Plant Maintenance, Inspection, and Repair Programs* procedure states that nonconformances that compromise worker safety or create a fire risk in Extreme High Fire Threat Zones only in Southern California require corrective action within six months. The current January 2020 version of GO 95 does not have different corrective action priority requirements between Northern California and Southern California. Frontier's procedure also lists an Extreme High Fire Threat Zone as Tier 1. In GO 95, Rule 21.2.D, an area with an extreme fire risk is defined as a Tier 3 High Fire Threat District. Frontier must update its procedure to reflect the requirements in the latest version of GO 95.

### III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure Type	Approximate Address / Coordinates	City
1	Pole	37.4747543, -121.1333073	Patterson
2	Pole	37.4751021, -121.1335691	Patterson
3	Pole	37.4750866, -121.1336349	Patterson
4	Pole	37.4752708, -121.1337814	Patterson
5	Pole	37.4754967, -121.1338525	Patterson
6	Pole	37.4755669, -121.1339755	Patterson
7	Pole	37.4812941, -121.1360773	Patterson
8	Pole	37.4811674, -121.1363637	Patterson
9	Pole and pedestal	37.4869614, -121.1409288	Patterson
10	Pole	37.4871312, -121.1407340	Patterson
11	Pole	37.4874797, -121.1409479	Patterson
12	Pole	37.4801785, -121.1283576	Patterson
13	Pole	37.4802429, -121.1282024	Patterson
14	Pole	37.4803921, -121.1285038	Patterson
15	Pole	37.4804789, -121.1282580	Patterson
16	Pole	37.4797280, -121.1281524	Patterson
17	Pole	37.4797280, -121.1281524	Patterson
18	Pole	37.4793507, -121.1278379	Patterson
19	Pole	37.4796815, -121.1279295	Patterson
20	Pole	37.5491216, -121.1926492	Westley
21	Pole	37.5486873, -121.193227	Westley
22	Pole	37.5490517, -121.1925295	Westley
23	Pole	37.5459160, -121.196710	Westley
24	Handhole	37.5459160, -121.1967107	Westley
25	Pole	37.5459993, -121.1968039	Westley
26	Pole	37.5463230, -121.1971663	Westley
27	Pole	37.5465854, -121.1974674	Westley
28	Pole	37.5468653, -121.1977447	Westley
29	Pole	37.5469509, -121.1976196	Westley
30	Pole	37.5471415, -121.1973608	Westley
31	Antenna Tower	37.4002868, -121.2534753	Westley
32	Pole	37.4002868, -121.2534753	Diablo Grande
33	Pole	37.3995421, -121.2564784	Diablo Grande
34	Pole	37.3995922, -121.2563898	Diablo Grande
35	Pole	37.3996516, -121.2562034	Diablo Grande
36	Vault	37.4638064, -121.1756265	Patterson
37	Vault	37.4632403, -121.1750736	Patterson

<b>38</b>	Handhole	37.4616861, -121.1345337	Patterson
<b>39</b>	Pole	37.4667448, -121.1275741	Patterson
<b>40</b>	Pole	37.4668976, -121.1276220	Patterson
<b>41</b>	Pole	37.4671049, -121.1278467	Patterson
<b>42</b>	Pole	37.4672464, -121.1278809	Patterson
<b>43</b>	Pole	37.4673954, -121.128049	Patterson
<b>44</b>	Pole	37.4677363, -121.1283040	Patterson
<b>45</b>	Pole	37.9607863, -120.2368765	Tuolumne
<b>46</b>	Pole	37.9609930, -120.2368587	Tuolumne
<b>47</b>	Pole	37.9613988, -120.2368530	Tuolumne
<b>48</b>	Pole	37.9620258, -120.2368316	Tuolumne
<b>49</b>	Pole	37.9621781, -120.2368627	Tuolumne
<b>50</b>	Pole	37.9623401, -120.2368842	Tuolumne
<b>51</b>	Pole	37.9603142, -120.236862	Tuolumne
<b>52</b>	Pole	37.9600515, -120.2368721	Tuolumne
<b>53</b>	Pole	37.9596671, -120.2368604	Tuolumne
<b>54</b>	Pole	37.9591823, -120.2368651	Tuolumne
<b>55</b>	Pole	37.9591175, -120.2368054	Tuolumne
<b>56</b>	Pole	37.9805562, -120.2394065	Tuolumne
<b>57</b>	Pole	37.9969234, -120.2325162	Tuolumne
<b>58</b>	Pole	37.9974209, -120.2325776	Tuolumne
<b>59</b>	Pole	37.9979152, -120.2326004	Tuolumne
<b>60</b>	Pedestal	37.9746101, -120.2424840	Tuolumne
<b>61</b>	Pole	37.9839784, -120.2059054	Tuolumne
<b>62</b>	Pole	37.9566580, -120.2346399	Tuolumne
<b>63</b>	Pole	37.9569567, -120.234471	Tuolumne
<b>64</b>	Pole	37.9573657, -120.2344773	Tuolumne
<b>65</b>	Pole	37.9575518, -120.2344716	Tuolumne
<b>66</b>	Pole	37.3873383, -120.7247485	Livingston
<b>67</b>	Pole	37.3873450, -120.7250405	Livingston
<b>68</b>	Pole	37.3873420, -120.725393	Livingston
<b>69</b>	Pole and pedestal	37.3876692, -120.7253889	Livingston
<b>70</b>	Pole	37.3869952, -120.7254120	Livingston
<b>71</b>	Pole	37.3868519, -120.7255870	Livingston
<b>72</b>	Pole	37.3864592, -120.7256052	Livingston
<b>73</b>	Pole	37.3864584, -120.7254087	Livingston
<b>74</b>	Pole	37.3865128, -120.7253534	Livingston
<b>75</b>	Pole	37.3865104, -120.7250761	Livingston
<b>76</b>	Pole	37.3864574, -120.7250925	Livingston
<b>77</b>	Pole	37.3864994, -120.7247304	Livingston
<b>78</b>	Vault	37.3866737, -120.7369629	Livingston
<b>79</b>	Handhole	37.3872339, -120.7369237	Livingston
<b>80</b>	Handhole	37.3882891, -120.7361751	Livingston
<b>81</b>	Pole	37.3962441, -120.7391949	Livingston

<b>82</b>	Pole	37.3891647, -120.7227064	Livingston
<b>83</b>	Pole	37.3891050, -120.7225746	Livingston
<b>84</b>	Pole	37.3890057, -120.7223332	Livingston
<b>85</b>	Pole	37.3890057, -120.7223332	Livingston
<b>86</b>	Pole	37.3888783, -120.7217471	Livingston
<b>87</b>	Pole	37.3900307, -120.7223201	Livingston
<b>88</b>	Pole	37.3902108, -120.7228304	Livingston
<b>89</b>	Pedestal	37.3603582, -120.8023472	Livingston
<b>90</b>	Pole	37.3745666, -120.797355	Livingston
<b>91</b>	Pole	37.3742850, -120.7973599	Livingston
<b>92</b>	Pole	37.4191914, -120.6656776	Cressey
<b>93</b>	Pole	37.4193125, -120.6658821	Cressey
<b>94</b>	Pole	37.4195242, -120.6662405	Cressey
<b>95</b>	Pole	37.4196015, -120.6663847	Cressey
<b>96</b>	Pole	37.4195352, -120.6663813	Cressey
<b>97</b>	Pole	37.4197796, -120.6666542	Cressey
<b>98</b>	Pole	37.4202416, -120.6662227	Cressey
<b>99</b>	Pole	37.4206136, -120.6658519	Cressey
<b>100</b>	Pole	37.4204482, -120.6655525	Cressey
<b>101</b>	Pole	37.4202751, -120.6652587	Cressey
<b>102</b>	Pole	37.420100, -120.664970	Cressey
<b>103</b>	Pole	37.3821970, -120.7216848	Livingston
<b>104</b>	Pole	37.3818344, -120.7216905	Livingston
<b>105</b>	Pole	37.3816615, -120.7216992	Livingston
<b>106</b>	Pole	37.3813192, -120.7217126	Livingston
<b>107</b>	Pole	37.3809643, -120.7217146	Livingston
<b>108</b>	Pole	37.3806068, -120.7217200	Livingston
<b>109</b>	Pole	37.3804307, -120.7217243	Livingston
<b>110</b>	Pole	37.3802517, -120.7217300	Livingston
<b>111</b>	Pole	37.3798880, -120.7217552	Livingston
<b>112</b>	Pole	37.3795742, -120.7217501	Livingston
<b>113</b>	Pole	37.3792414, -120.7217679	Livingston
<b>114</b>	Pole and pedestal	37.3788807, -120.7217746	Livingston
<b>115</b>	Pole	37.3806196, -120.7205626	Livingston
<b>116</b>	Pole	37.3811202, -120.7205539	Livingston
<b>117</b>	Pole	37.3814817, -120.7206042	Livingston
<b>118</b>	Pole	37.3816437, -120.7205629	Livingston
<b>119</b>	Pole	37.3821096, -120.7205465	Livingston
<b>120</b>	Pole	37.3823182, -120.7205281	Livingston
<b>121</b>	Pole	37.3824509, -120.7205777	Livingston
<b>122</b>	Pole	37.3826840, -120.7205807	Livingston
<b>123</b>	Pole	37.3829091, -120.7205629	Livingston
<b>124</b>	Pole	37.3831644, -120.7205636	Livingston
<b>125</b>	Pole	37.3830437, -120.7216103	Livingston

<b>126</b>	Pole	37.3826838, -120.7216626	Livingston
<b>127</b>	Pole	37.3823878, -120.7216217	Livingston
<b>128</b>	Pole	37.3823473, -120.7216774	Livingston

#### IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

##### 1. GO 95, Rule 31.1, Design, Construction and Maintenance states in part:

*Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

ESRB's findings are listed in Table 2:

**Table 2: GO 95, Rule 31.1 Findings**

Location #	Findings
18	The lashing wire on Frontier's cable span is damaged.
47	Two visibility strips on the Frontier pole are damaged. The one remaining visibility strip is faded.
62	The overhead communication cable taps are currently wrapped in a plastic bag-like material and require a permanent enclosure.
71	The bolts that secure the overhead communication cable enclosure are beginning to loosen and expose the internal cables.
73	Frontier needs to remove its buddy pole and transfer its facilities to the newly installed joint pole.
81	The overhead communication cable enclosure is damaged and exposes the internal cables. Additionally, the lid on the pole-mounted enclosure is not closed, which exposes the internal cables.
92	The pole is missing visibility strips.
93	The pole is missing visibility strips.
95	The pole is missing visibility strips.
97	The pole is missing visibility strips.
107	The overhead communication cable enclosure is damaged and exposes the internal cables
108	The overhead communication cable enclosure is damaged and exposes the internal cables

##### 2. GO 95, Rule 31.6, Abandoned Lines states:

*Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or*

*property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.*

ESRB’s findings are listed in Table 3:

**Table 3: GO 95, Rule 31.6 Findings**

<b>Location #</b>	<b>Findings</b>
2	There is an abandoned Frontier service drop hanging off the pole and lying on the ground.
6	There is an abandoned Frontier service drop hanging off the pole.
20	There is an abandoned Frontier service drop hanging off the pole.
22	There is an abandoned Frontier service drop hanging off the pole.
28	There is an abandoned Frontier service drop hanging midspan between Locations 28 and 27.
52	There is an abandoned Frontier service drop wrapped around the pole.
53	There is an abandoned Frontier service drop wrapped on a nearby chain link fence.
54	There is an abandoned Frontier service drop hanging off the pole.
61	There is an abandoned Frontier cable hanging on an abandoned pole.
63	There is an abandoned Frontier service drop wrapped around the pole.
64	There is an abandoned Frontier service drop hanging midspan between Locations 63 and 64.
69	There is an abandoned Frontier service drop hanging off the pole.
82	There is an abandoned Frontier service drop hanging off the pole.
88	There is an abandoned Frontier service drop hanging off the pole.
92	There is an abandoned Frontier service drop hanging off the pole.
98	There is an abandoned Frontier service drop hanging off the pole.
100	There is an abandoned Frontier service drop hanging off the pole.
101	There is an abandoned Frontier service drop hanging midspan between Locations 101 and 102.
103	There is an abandoned Frontier service drop hanging about three feet from the pole.
104	There is an abandoned Frontier service drop hanging midspan between Locations 104 and 105.

Location #	Findings
112	There is an abandoned Frontier service drop hanging midspan between Locations 112 and 113.
114	There is an abandoned Frontier service drop hanging off the pole.
116	There is an abandoned Frontier service drop hanging off the pole and lying on a nearby wood fence.
122	There is an abandoned Frontier service drop hanging off the pole and lying on the ground.
126	There is an abandoned Frontier service drop hanging midspan between Locations 126 and 127.
128	There is an abandoned Frontier service drop hanging off the pole and lying on the ground.

**3. GO 95, Rule 34, Foreign Attachments** states in part:

*Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

ESRB’s findings are listed in Table 4:

**Table 4: GO 95, Rule 34 Findings**

Location #	Findings
19	There is an unauthorized sign attached to the Frontier pole.
22	There are unauthorized signs attached to the Frontier pole.
72	There is an unauthorized customer-owned light attached to the Frontier pole.
94	There is an unauthorized customer-owned clothes drying line attached to the Frontier pole.

**4. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 3.B** requires the following:

*Communication conductors crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts require at least 18 feet of vertical clearance.*

ESRB’s finding is listed in Table 5:

**Table 5: GO 95, Rule 37 Finding**

Location #	Finding
5	The Frontier communication span along the thoroughfare was less than 18 feet above the ground line.

5. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 5.B** requires the following:

*Communication conductors above ground in areas accessible to pedestrians only require at least 10 feet of vertical clearance.*

**GO 95, Rule 84.4.A.(3), Accessible to Pedestrians Only** states:

*Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet.*

ESRB’s findings are listed in Table 6:

**Table 6: GO 95, Rule 37 and 84.4 Findings**

Location #	Findings
44	The Frontier service drop runs through a customer’s backyard and is less than 8 feet above the ground line.
53	The Frontier service drop runs through a customer’s backyard, touches the top of a chain link fence, and is less than 8 feet above the ground line.

6. **GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 3.C** requires the following:

*Communication conductors between other communication conductors not supported on the same poles requires a minimum clearance of 24 inches.*

ESRB’s finding is listed in Table 7:

**Table 7: GO 95, Rule 38 Finding**

Location #	Finding
126	The Frontier service drop was lying on the Spectrum service drop.

**7. GO 95, Rule 83.4, Bonding** states in part:

*When separate communication messengers, or guys, or both, of the same or different ownership, are attached to the same pole, and they are in proximity to electric supply circuits (see Rule 21.5- D), railway signal circuits or Class T electric railway or trolley circuits, such messengers, or guys, or both, shall be bonded together at frequent intervals (see Rule 83.4-A). For purposes of this rule, communication messengers and guys are those which support Class C Circuits (see Rule 20.6) and those Class C Circuits which are used for television transmission.*

ESRB’s finding is listed in Table 8:

**Table 8: GO 95, Rule 83.4 Finding**

Location #	Finding
39	The bonding wire between Comcast’s and Frontier’s communication messenger facilities is severed.

**8. GO 95, Rule 84.6.B, Ground Wires** states:

*Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.*

*Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8).*

ESRB’s findings are listed in Table 9:

**Table 9: GO 95, Rule 84.6 Findings**

Location #	Findings
62	The vertical ground molding is missing.
67	The vertical ground molding is damaged and exposed the ground wire.
95	The vertical ground molding is missing.

**9. GO 95, Rule 84.7.A, Climbing Space and Working Space, Climbing Space** states in part:

*The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–A5.).*

ESRB’s finding is listed in Table 10:

**Table 10: GO 95, Rule 84.7 Finding**

Location #	Finding
4	An overgrown bush is obstructing the entire bottom half of the pole.

**10. GO 95, Rule 86.2, Guys, Use** states in part:

*Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.*

ESRB’s findings are listed in Table 11:

**Table 11: GO 95, Rule 86.2 Findings**

Location #	Findings
8	The anchor guy is severed and not attached to an anchor.
29	The span guy between Locations 28 and 29 is slacked.
34	The anchor guy is wrapped around the pole and not attached to an anchor.
45	The anchor guy is slacked.
81	The anchor guy is severed and not attached to the pole.
88	The anchor guy is slacked.
95	The anchor guy is slacked.
122	The anchor guy is slacked.

**11. GO 95, Rule 86.7.B, Location of Sectionalizing Insulators, Anchor Guys** states in part:

*An insulator shall be installed in each anchor guy which is required to be sectionalized by Rule 86.6–B2, so that such insulator is located not less than 8 feet above the ground and either 8 feet below the level of the lowest supply*

*conductor or not less than 6 feet from surface of pole and not less than one foot below the level of the lowest supply conductor.*

ESRB’s findings are listed in Table 12:

**Table 12: GO 95, Rule 86.7 Findings**

<b>Location #</b>	<b>Findings</b>
18	The anchor guy is missing a sectionalizing insulator.
23	The anchor guy is missing a sectionalizing insulator.
35	The anchor guy is missing a sectionalizing insulator.
114	The anchor guy is missing a sectionalizing insulator.

**12. GO 95, Rule 86.9, Guy Marker (Guy Guard) states:**

*A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.*

ESRB’s findings are listed in Table 13:

**Table 13: GO 95, Rule 86.9 Findings**

<b>Location #</b>	<b>Findings</b>
69	The anchor guy marker is damaged.
95	The anchor guy marker is missing.
96	The anchor guy marker is less than 8 feet in length.
124	The anchor guy marker is starting to detach. The guy marker is also a thin piece of wood that may not be substantial enough to mark and guard the anchor guy.
125	The anchor guy marker is missing.

**13. GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground states:**

*Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:*

a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8

ESRB’s findings are listed in Table 14:

**Table 14: GO 95, Rule 87.7 Findings**

<b>Location #</b>	<b>Findings</b>
8	The metallic riser covers less than 8 feet above the ground line.
10	The metallic riser covers less than 8 feet above the ground line and is not properly secured to the pole, which exposes the riser cable.
28	The metallic riser covers less than 8 feet above the ground line and is not properly secured to the pole, which exposes the riser cable.
29	About half a foot of the riser cable is not protected starting at the ground line.
32	The riser cables are missing a protective cover.
45	The metallic riser cover is not properly secured to the pole, which exposes the riser cable.
49	The riser cables are missing a protective cover.
86	The metallic riser covers less than 8 feet above the ground line.
116	The plastic riser cover is not properly secured to the pole, which exposes the riser cable.
120	The metallic riser cover is not properly secured to the pole, which exposes the riser cable.

**14. GO 95, Rule 91.3.C, Stepping** states in part:

*C. Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

ESRB’s findings are listed in Table 15:

**Table 15: GO 95, Rule 91.3 Findings**

Location #	Findings
5	The pole steps are accessible less than 8 feet from the ground line.
39	The pole steps are accessible less than 8 feet from the ground line.
40	The pole steps are accessible less than 8 feet from the ground line.
43	The pole steps are accessible less than 8 feet from the ground line.
49	The pole steps are accessible less than 8 feet from the ground line.
52	The pole steps are accessible less than 8 feet from the ground line.
62	The pole steps are accessible less than 8 feet from the ground line.
63	The pole steps are accessible less than 8 feet from the ground line.
86	The pole steps are accessible less than 8 feet from the nearby easily climbable foreign structure.
87	The pole steps are accessible less than 8 feet from the nearby easily climbable foreign structure.
90	The pole steps are accessible less than 8 feet from the ground line.
123	The pole steps are accessible less than 8 feet from the ground line.

**15. GO 128, Rule 17.1, Design, Construction and Maintenance** states in part:

*Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

*For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.*

ESRB’s findings are listed in Table 16:

**Table 1: GO 128, Rule 17.1 Findings**

<b>Location #</b>	<b>Findings</b>
38	The communication cable taps are currently wrapped in a plastic bag-like material and require a permanent enclosure.
60	The ground wire for one of the cable runs was not bonded to the ground rod. Frontier immediately corrected this issue during the audit.
69	The pedestal cover was opened and exposed the cables. Frontier immediately reattached and secured the cover during the audit.
114	The pedestal cover was opened and exposed the cables. Frontier immediately reattached and secured the cover during the audit.

**16. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures** states:

*Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.*

ESRB’s findings are listed in Table 17:

**Table 2: GO 128, Rule 17.8 Findings**

<b>Location #</b>	<b>Findings</b>
24	The handhole did not have an ownership sign.
36	The vault did not have the correct ownership sign. The vault indicated it was owned by AT&T; however, only Frontier facilities existed in the vault.
37	The vault did not have the correct ownership sign. The vault indicated it was owned by AT&T; however, only Frontier facilities existed in the vault.
38	The handhole did not have an ownership sign.
89	The identification and warning signs on the surface-mounted pedestal are faded and damaged.

**17. GO 128, Rule 42.7, Covers** states:

*Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal (Also See Rule 17.8 and Appendix B, Figure 9).*

ESRB's finding is listed in Table 18:

**Table 18: GO 95, Rule 42.7 Finding**

<b>Location #</b>	<b>Finding</b>
78	The vault lid was not securely closed by any bolts and could be opened by the public without any tools.

**V. Observations**

**1. GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards** states in part:

- (2) *Where a communications company's or an electric utility's (Company A's) actions result in potential violations of GO 95 for another entity (Company B), that entity's (Company B's) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.*
- (3) *If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.*
- (4) *To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO95.*

Table 19 includes all non-Frontier (third party) findings that ESRB observed during the audit. Frontier must create outgoing third-party notifications to the respective companies for the following observations:

**Table 19: Observations**

Location #	Findings
2	PG&E's ground molding is damaged and exposes the ground wire.
5	PG&E's ground molding is damaged and exposes the ground wire. The visibility strips on the jointly owned pole are damaged.

Location #	Findings
8	An unknown communication cable is abandoned.
9	There are unauthorized attachments (signs) on the jointly owned pole.
11	There are unauthorized attachments (signs) on the jointly owned pole.
12	PG&E's ground rod is exposed above ground. Comcast's cable span is contacting Frontier's facilities.
15	PG&E's ground molding is not secured to the pole.
16	PG&E's and Comcast's anchor guy wires are loose.
18	The Comcast service drop to 433 Walnut Ct, Patterson, is low above the private driveway.
39	PG&E's ground wire is severed. Comcast's ground molding is damaged and exposes the ground wire.
43	The visibility strips are damaged. Comcast's amplifier grounding is missing. A ground molding exists, but there is no ground wire. PG&E's anchor guy is loose.
44	The visibility strips are damaged.
56	PG&E's ground molding is damaged and exposes the ground wire.
58	There is an unauthorized attachment (a sign) on the jointly owned pole.
69	PG&E's ground molding is damaged and exposes the ground wire.
71	There is an unauthorized attachment (a laundry line) on the jointly owned pole.
72	PG&E's service drop is lying on Frontier's cable span.
73	Comcast's ground molding is damaged and exposes the ground wire.
74	An abandoned Comcast service drop is wrapped around PG&E's service drop.
76	There are unauthorized attachments (solar panels, security cameras, and lights) on the jointly owned pole.
77	Comcast's service drop is lying on Frontier's cable span.
107	PG&E's ground molding is damaged and exposes the ground wire.
108	Spectrum's service drop to the backyard of 1045 4 <sup>th</sup> St, Livingston, is low. Spectrum's amplifier is not bonded to ground. Spectrum's ground molding is damaged and exposes the ground wire.
110	PG&E's anchor guy is loose.
113	PG&E's ground molding is damaged and exposes the ground wire.

Location #	Findings
114	Spectrum’s service drop along a private driveway is low Spectrum’s anchor guy is loose.
115	PG&E’s primary voltage riser cover is damaged at ground level and exposes insulated conductor cables.
116	Spectrum’s service drop is hanging on Frontier’s cable span.

**2. GO 95, Rule 31.1, Design, Construction and Maintenance** states in part:

*For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.*

*A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard.*

Frontier California’s Outside Plant Maintenance, Inspection, and Repair Programs require its local managers to perform ten inspections per month as part of its “*long-standing quality inspection program*”. These inspections focus on “*compliance with installation or maintenance guidelines*” and are used for determining a worker’s “*satisfactory job performance*”. Adhering to this procedural requirement ensures facilities are being installed and maintained properly. Frontier did not provide evidence to demonstrate that its local managers in the Tuolumne, Livingston, and Patterson service areas completed these quality control inspections in 2022. Frontier explained it does not have a way to provide an entire year’s report. Without access to this recordkeeping, ESRB cannot verify if Frontier follows its own procedural requirement. Frontier shall provide records to demonstrate it meets its obligation to perform its quality control inspections as required.