

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 9, 2025

CA2024-1197

Judy Geise
Manager, Regulatory
Frontier Communications ("Frontier")
1919 McKinney Avenue
Dallas, TX 75201

SUBJECT: Audit of Frontier West Los Angeles County Area

Ms. Geise:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujiiye of my staff conducted a Communication Infrastructure Provider (CIP) audit of Frontier West Los Angeles County Area on December 9-13, 2024. The audit included a review of Frontier's West Los Angeles County Area inspection and maintenance records and a field inspection of Frontier's West Los Angeles County Area facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). An itemized copy of the audit findings of violations identified by staff is enclosed with this letter. Please advise me no later than May 9, 2025, by electronic or hard copy, of all corrective measures taken by Frontier to remediate and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, please contact Eric Ujiiye at (213) 620-2598 or Eric.Ujiiye@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead detail and patrol inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Frontier's Intrusive Inspection of Wood Poles
- Frontier's Overhead Lines Maintenance Plan
- Frontier's Visual Inspections of Overhead Lines

II. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID	Structure Type	Location
1	396356M	Pole	Playa Del Ray
2	333852M	Pole	Playa Del Ray
3	334760M	Pole	Playa Del Ray
4	334761M	Pole	Playa Del Ray
5	334462M	Pole	Playa Del Ray
6	338846M	Pole	Playa Del Ray
7	408328M	Pole	Playa Del Ray
8	334763M	Pole	Playa Del Ray
9	334764M	Pole	Playa Del Ray
10	415895M	Pole	Playa Del Ray
11	388192M	Pole	Playa Del Ray
12	2033138M	Pole	Playa Del Ray
13	344776M	Pole	Playa Del Ray
14	Next to Pole 344776M	Vault	Playa Del Ray
15	2060649E	Pole	Santa Monica
16	4314113E	Pole	Santa Monica
17	4467773E	Pole	Santa Monica
18	4427286E	Pole	Santa Monica
19	2255629E	Pole	Santa Monica
20	2255628E	Pole	Santa Monica
21	2255493E	Pole	Santa Monica
22	545705E	Pole	Santa Monica
23	93242M	Pole	Culver City

24	166199M	Pole	Culver City
25	313603M	Pole	Culver City
26	93241M	Pole	Culver City
27	93243M	Pole	Culver City
28	93239M	Pole	Culver City
29	93238M	Pole	Culver City
30	40347M	Pole	Culver City
31	Rear of 4110 Inglewood Blvd.	Pole	Culver City
32	93237M	Pole	Culver City
33	Rear of 4072 Inglewood Blvd.	Pole	Culver City
34	93235M	Pole	Culver City
35	93234M	Pole	Culver City
36	93233M	Pole	Culver City
37	289295M	Pole	Culver City
38	429162M	Pole	Culver City
39	220030M	Pole	Culver City
40	225963M	Pole	Culver City
41	137942M	Pole	Culver City
42	390218M	Pole	Culver City
42.1	288155M	Pole	Culver City
43	221761M	Pole	Culver City
44	GT142535	Pole	Culver City
45	GT142554	Pole	Culver City
46	390209M	Pole	Culver City
47	397489M	Pole	Culver City
48	121022M	Pole	Bel Air
49	74613M	Pole	Bel Air
50	74612M	Pole	Bel Air
51	210894M	Pole	Bel Air
52	296631M	Pole	West Los Angeles
53	943 1 st Street	Hand Hole	Manhattan Beach
54	934 1 st Street	Hand Hole	Manhattan Beach
55	922 1 st Street	Hand Hole	Manhattan Beach
56	910 1 st Street	Hand Hole	Manhattan Beach
57	106 S. Poinsettia Ave.	Hand Hole	Manhattan Beach
58	828 1 st Street	Hand Hole	Manhattan Beach
59	820 1 st street	Hand Hole	Manhattan Beach
60	814 1 st Street	Hand Hole	Manhattan Beach

61	606496E	Pole	Manhattan Beach
62	441 1 st Street	Pole	Manhattan Beach
63	429 1 st Street	Pole	Manhattan Beach
64	4887267E	Pole	Manhattan Beach
65	4351255E	Pole	Manhattan Beach
66	1486643E	Pole	Manhattan Beach
67	1083543E	Pole	Manhattan Beach
68	2244687E	Pole	Manhattan Beach
69	801 N. Ardmore	Pole	Manhattan Beach
70	1393797E	Pole	Palos Verde
71	1393796E	Pole	Palos Verde
72	1393795E	Pole	Palos Verde
73	1393794E	Pole	Palos Verde
74	1394205E	Pole	Palos Verde
75	GT10180	Pole	Redondo Beach
76	A8182Y	Pole	Redondo Beach
77	833592E	Pole	Redondo Beach
78	833591E	Pole	Redondo Beach
79	833590E	Pole	Redondo Beach
80	833589E	Pole	Redondo Beach
81	4283892E	Pole	Redondo Beach
82	900498E	Pole	Redondo Beach
83	617989E	Pole	Redondo Beach
84	617988E	Pole	Redondo Beach
85	913771E	Pole	Redondo Beach
86	913770E	Pole	Redondo Beach
87	913769E	Pole	Redondo Beach
88	913761E	Pole	Redondo Beach
89	4840400E	Pole	Redondo Beach
90	A8185Y	Pole	Redondo Beach
91	A8184Y	Pole	Redondo Beach
92	A8183Y	Pole	Redondo Beach
93	BF44065	Pole	Torrance
94	1035684E	Pole	Torrance
95	1035653E	Pole	Torrance
96	1035654E	Pole	Torrance
97	1035655E	Pole	Torrance
98	1083572E	Pole	Torrance
99	1035656E	Pole	Torrance

100	1035657E	Pole	Torrance
101	1035658E	Pole	Torrance
102	1035659E	Pole	Torrance
103	1035660E	Pole	Torrance
104	1140837E	Pole	Torrance
105	4852957E	Pole	Torrance
106	1140836E	Pole	Torrance
107	1140835E	Pole	Torrance
108	1485214E	Pole	Torrance
109	1358204E	Pole	Torrance
110	1318729E	Pole	Torrance
111	1358205E	Pole	Torrance
112	1230661E	Pole	Torrance
113	1983714E	Pole	Torrance
114	4258279E	Pole	Torrance
115	1358207E	Pole	Torrance
116	4814403E	Pole	Torrance
117	1358208E	Pole	Torrance
118	1035448E	Pole	Torrance
119	1035447E	Pole	Torrance
120	1035446E	Pole	Torrance

III. Field Inspection - Violations List

My staff observed the following violations during field inspection portion of the audit:

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:

(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 10 business days after the discovery.

Frontier did not report the following third-party GO 95 nonconformances:

- Pole 334760M – a third-party communications service drop was wrapped around a Frontier conductor span.
- Pole 334761M – a third-party communications cable span was detached from the messenger span and contacting a Frontier conductor span.
- Pole 334761M – a supply down guy anchor near the pole was abandoned and covered with a section of plastic pipe.

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.

Frontier facilities on each of the following poles required maintenance:

- Pole 390218M – The down guy marker supported on the pole was damaged.
- Pole 1140836E – The conductor span had a broken lashing wire.

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.

Frontier facilities on each of the following poles were permanently abandoned and should be removed:

- Pole 93235M – a detached service drop was hanging on a pole step located at the communication level.

- Pole 1358204E – a detached service drop was left to hang off the conductor span near the pole.

GO 95, Rule 37: Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc. Table 1, Column B, Case 4 requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0-750 Volts” that are “Crossing or along thoroughfares in urban districts or crossing thoroughfares in rural areas,” to be 18 feet.

A conductor span supported on Pole 4258279E and crossing an apartment complex driveway entering from Donora Ave in the City of Torrance was measured to have a vertical clearance of 13 feet, 5 inches from ground.

GO 95, Rule 37: Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc. Table 1, Column B, Case 5, requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0-750 Volts” that are “Above ground in areas accessible to pedestrians only” to be 10 feet.

Frontier facilities on each of the following poles had less than the required minimal vertical clearance:

- Pole 2255629E – a service drop was wrapped around a riser supported on the pole and touching a 6-foot fence at midspan.
- Pole 1035660E – a service drop supported on the pole sagged to approximately 6 feet above the ground over a walkway.

GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8 requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

Frontier facilities on each of the following poles did not have the minimum required vertical clearance:

- Pole 396356M - a Frontier conductor span was touching a third-party communications conductor span near the pole.
- Pole 93243M – a Frontier service drop was touching a supply service drop at midspan that was supported on the same pole.
- Pole 606496E – a Frontier conductor span was touching a third-party communications conductor at midspan that was supported on the same pole.
- Pole 900498E – multiple Frontier service drops were attached to a third-party communications conductor that was supported on the pole.
- Pole 1035658E – a Frontier conductor span was attached to a third-party communications conductor at midspan that was supported on the same pole.

- Pole 1140835E – a Frontier conductor span was touching a third-party communications conductor at midspan that was supported on the same pole.

GO 95, Rule 86.2, 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.

A Frontier down guy wire attached to each of the following poles was not taut:

- Pole 93242M – the down guy wire supporting the Frontier facilities level of the pole was not maintained taut.
- Pole 390218M – the down guy wire supporting the Frontier facilities level of the pole was not maintained taut.

GO 95, Rule 84.6-B, Ground Wires, states in part:

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...

The Frontier ground wire protective covering on each of the following poles was damaged:

- Pole 93241M – the ground wire protective covering supported on the pole was damaged, exposing sections of the ground wire at the public level.
- Pole 93239M – the ground wire protective covering supported on the pole was damaged, exposing the ground wire at the public level.
- Pole 93237M – the ground wire protective covering was damaged and loosely secured to the pole, exposing a 5-foot section of ground wire at the public level.

GO 95, Rule 84.7-A, Climbing Space, states in part:

Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c , 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

The climbing space on Pole GT10180 was obstructed near the base of the pole by branches and foliage.

GO 95, Rule 87.7-D.1, Covered from Ground Level to 8 Feet above the Ground, states in part:

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

The Frontier riser on each of the following poles was not covered:

- Pole 4887267E – multiple loosely risers attached to the surface of the pole were not covered and protected at the public level.
- Pole 617988E – a loosely attached riser to the surface of the pole was not covered and protected at the public level.