

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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February 6, 2025

CA2024-1239

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

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Frontier North – Alpine, Coleville, Bridgeport, Lee Vinning, June Lake, and Mammoth Lakes

Ms. Smith:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Nora Nguyen of ESRB conducted a CIP audit of Frontier's Alpine, Coleville, Bridgeport, Lee Vinning, June Lake, and Mammoth Lakes wire centers from July 8, 2024 through July 12, 2024. During the audit, ESRB staff conducted field inspections of Frontier's communications facilities and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than March 6, 2025, by electronic copy of all corrective actions and preventive measures taken by Frontier to correct the identified violations and prevent the recurrence of 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 provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Brandon Vazquez at (628) 249-2867 or brandon.vazquez@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 CIP Audit Report for Frontier North – Alpine, Coleville, Bridgeport, Lee Vinning, June Lake, and Mammoth Lakes

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Yi “Rocky” Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
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Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Judy Geise, Manager - Regulatory, Frontier

**CPUC AUDIT FINDINGS
FRONTIER NORTH – COLEVILLE CIP AUDIT
JULY 8-12, 2024**

I. Records Review

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

- Frontier’s facilities statistics.
- Frontier's Facility Maps for each Wire Center.
- Frontier’s General Order (GO) 95 and GO 128 inspection programs.
- Frontier’s inspector training program.
- Patrol and detailed-inspection records for the last five years (June 2019 – June 2024).
- Work order (ticket) records for overhead and underground Frontier facilities for the last five years (June 2019 – June 2024).
- Third Party Safety Hazard notifications for the last five years (June 2019 – June 2024).
- Pole loading and safety factor calculations completed in the last twelve months (June 2023 – June 2024).
- Intrusive pole tests conducted in the last three years (June 2021 – June 2024).
- New construction projects completed in the last twelve months (June 2023 – June 2024).

II. Records Violations

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

1. GO 95, Rule 18-B1(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.”*

ESRB’s review of Frontier’s tickets from June 2019 through June 2024 found that Frontier had 82 late-pending tickets and 102 late-closed tickets of 2,521 total tickets. Late-pending tickets are pending tickets that have not been completed by their assigned due date based on their hazard level, and late-closed tickets are tickets that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 184 late tickets by hazard level, including the total number of late tickets, as well as late-pending and late-closed tickets, which are included in the total.

Table 1: Late Tickets

Hazard Level	Total Late Tickets	Late-Pending Tickets	Late-Closed Tickets
1	-	-	-
2	181	79	102
3	3	3	-
Total	184	82	102

Most Past-Due Late-Closed Ticket

Ticket TK1289890 was reported on 6/18/2019 as a Priority 2 for a downed span of line in a Tier 2 High Fire-Threat District (HFTD) with a Required Completion Date of 6/18/2020. Frontier did not repair the downed span until 6/30/2021, 377 days after the Required Completion Date.

Most Past-Due Late-Pending Ticket

Ticket TK2935864 was reported on 3/23/2022 as a Priority 2 for a service drop clearance infraction in a Tier 2 HFTD with a Required Completion Date of 4/26/2024. Frontier had not yet completed repair work for the service drop as of the 7/5/2024 Pre-Audit Data Request Response. Additionally, ESRB notes that according to Frontier’s Maintenance Program, Priority 2 conditions in a Tier 2 HFTD require corrective actions within 12 months. The Required Completion Date for this ticket is due in over two years and does not follow Frontier’s procedures.

2. GO 128, Rule 17.2, Inspection states in part:

“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules.”

Frontier Inspection Maintenance Procedure (January 2024) states in part:

“GO 128 requires communications systems to be “inspected by the operator frequently and thoroughly” to ensure that they are in “good condition.” GO 128, Rule 17.2. Frontier California complies with this requirement.

Frontier California has regular Manhole T-Zone inspections, which requires that Field Technicians examine the entire manhole for defects.”

Frontier did not provide any underground patrol or inspection records for the period of June 2019 through June 2024. Therefore, Frontier failed to show compliance with GO 128, Rule 17.2 and Frontier’s Inspection Maintenance Procedure through their inspection records. Frontier’s procedures do not specify the required frequency of conducting patrols and inspections. Frontier must update its procedures indicating required patrol and inspection time intervals to ensure that all its underground communication facilities are subject to the required inspections per GO 128, Rule 17.2.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Structure ID	Structure Type	GIS Coordinates
1		Pedestal	38.545592, -119.499147
2	294802	Pole	38.545575, -119.49917
3	294803	Pole	38.54556, -119.498389
4	294804	Pole	38.54557, -119.497645
5		Pedestal	38.51566, -119.477932
6	293687	Steel Pole	38.515697, -119.477896
7	293686	Steel Pole	38.515768, -119.478247
8	CTN92467	Frontier Pole	38.569929, -119.510929
9		Pedestal	38.569941, -119.510919
10	6407	Frontier Pole	38.570848, -119.511334
11	6408	Frontier Pole	38.571707, -119.511686
12	6409	Frontier Pole	38.572555, -119.512049
13	6410	Frontier Pole	38.57341, -119.512405
14		Frontier Pole	38.574276, -119.512829
15		Pedestal	38.574292, -119.512786
16		Pedestal	38.579038, -119.510836
17	295102	Joint Pole	38.579019, -119.510857
18	T-170	Pedestal	38.578921, -119.509158
19		Frontier Pole	38.578884, -119.509147
20	295138	Joint Pole	38.578745, -119.509096
21	554	Pedestal	38.610958, -119.519279
22	283438	Joint Pole	38.610957, -119.519267
23		Pedestal	38.603321, -119.499483
24	102337	Joint Pole	38.613094, -119.519674
25	102338	Joint Pole	38.613635, -119.519639

26	102339	Joint Pole	38.613912, -119.519633
27	204027	Joint Pole	38.614268, -119.519639
28	CIT90350	Frontier Pole	38.614511, -119.519634
29	183	Pedestal	38.614494, -119.519679
30	9364	Joint Pole	38.774702, -119.821582
31	264847	Pole Substation	38.774706, -119.821468
32	CTC99078	Frontier Pole	38.774374, -119.820835
33		Pedestal	38.774379, -119.820847
34	214614	Joint Pole	38.774315, -119.820642
35	290434	Joint Pole	38.77491, -119.821975
36	272083	Joint Pole	38.775021, -119.822191
37	214718	Frontier Pole	38.775039, -119.822692
38		Pedestal	38.775023, -119.82267
39	290435	Joint Pole	38.774647, -119.822654
40		Joint Pole	38.774141, -119.823237
41	214615	Joint Pole	38.774136, -119.822454
42	111	Pedestal	38.774141, -119.822463
43	1870906E	Joint Pole	38.255716, -119.224833
44	2357450E	Joint Pole	38.255722, -119.224643
45		Pedestal	38.255712, -119.224635
46	1870919E	Joint Pole	38.255774, -119.223904
47	245634-5	Joint Pole	38.255257, -119.224747
48	27452-CIT	Frontier Pole	38.254704, -119.224972
49	27453-CIT	Frontier Pole	38.254601, -119.225599
50	27454-CIT	Frontier Pole	38.254563, -119.226023
51	4918462E	Joint Pole	38.261512, -119.22132
52	1930379E	Joint Pole	38.261448, -119.221325

53	4329099E	Joint Pole	38.261403, -119.220744
54	CTC-82196	Frontier Pole	38.257058, -119.223515
55	4206882E	Joint Pole	38.256796, -119.223847
56	4206881E	Joint Pole	38.256663, -119.224058
57	4663568E	Frontier Pole	37.95634, -119.120162
58	1569118E	Joint Pole	37.95648, -119.120161
59	4663569E	Joint Pole	37.956585, -119.120138
60	31460-CIT	Frontier Pole	37.956597, -119.120026
61	2004355E	Joint Pole	37.957079, -119.120176
62	CTC81740	Frontier Pole	37.95743, -119.120188
63	3504	Frontier Pole	37.957525, -119.120166
64	4663567E	Joint Pole	37.957512, -119.120631
65	3506	Frontier Pole	37.957603, -119.120853
66	1995754E	Frontier Pole	37.952084, -119.117277
67	4100728E	Frontier Pole	37.952366, -119.117543
68	1901364E	Frontier Pole	37.952234, -119.117456
69	1792189E	Frontier Pole	37.952205, -119.11743
70	1792190E	Frontier Pole	37.952023, -119.117346
71	2377703E	Joint Pole	37.763314, -119.107549
72	2377704E	Joint Pole	37.763112, -119.108057
73	2377705E	Joint Pole	37.762903, -119.108558
74	2377702E	Joint Pole	37.763321, -119.107067
75	2377701E	Joint Pole	37.763267, -119.106705
76	2377796E	Joint Pole	37.763706, -119.10689
77	4020231E	Joint Pole	37.764274, -119.105919
78	4020229E	Joint Pole	37.764534, -119.105439
79	82971	Frontier Pole	37.765621, -119.103379

80	2054208E	Joint Pole	37.765761, -119.103164
81	245641-D	Joint Pole	37.765805, -119.10311
82	1735426E	Frontier Pole	37.765226, -119.103195
83	4020225E	Joint Pole	37.765141, -119.103375
84	4391370E	Joint Pole	37.764804, -119.103018
85	4863642E	Joint Pole	37.777958, -119.079048
86	248765	Joint Pole	37.777993, -119.079751
87		Frontier Pole	37.777559, -119.079656
88	248775	Joint Pole	37.778014, -119.080304
89	1875594E	Joint Pole	37.778556, -119.080251
90	4234669E	Joint Pole	37.779961, -119.074808
91	1937508E	Joint Pole	37.77967, -119.074624
92	1735430E	Joint Pole	37.779383, -119.074705
93	1593097E	Joint Pole	37.77828, -119.074712
94	2255168E	Tree Connect Service	37.777891, -119.074979
95	1735531E	Joint Pole	37.777879, -119.074842
96	290481	Joint Pole	38.775688, -119.824388
97	290432	Joint Pole	38.775193, -119.825166
98	290433	Joint Pole	38.774842, -119.825625
99	CIT 91481	Joint Pole	38.774536, -119.826082
100		Joint Pole	38.775952, -119.823898
101	39267	Joint Pole	38.776245, -119.823537
102	290430	Joint Pole	38.776635, -119.82294
103	107001	Joint Pole	38.77677, -119.822584
104	290439	Joint Pole	38.773501, -119.818835
105		Pedestal	38.77348, -119.818771
106	143841	Joint Pole	38.773839, -119.819535

107	143840	Joint Pole	38.774067, -119.81993
108		Pedestal	38.774064, -119.819955
109		Joint Pole	38.803129, -119.800378
110	297189	Joint Pole	38.80368, -119.801323
111	181132	Joint Pole	38.804013, -119.801882
112	181131	Joint Pole	38.804373, -119.802393
113	290963	Joint Pole	38.804545, -119.8027
114	290964	Joint Pole	38.805267, -119.802703
115	186711	Joint Pole	38.805265, -119.802344

IV. Field Inspection Violations

ESRB observed the following violations during the field inspection:

1. 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.”

Location	Violation Description
1	Pedestal missing cover.
45	Pedestal tied with zip ties. Needs bolts to properly close.

2. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 8 Column C states:

“The basic minimum allowable vertical separation between conductors and/or cables, on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole and in adjoining midspans is 12 inches.”

Location	Violation Description
8	Two Frontier lines in contact.
59	Frontier line contacting Cable TV line.

3. 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.”

Location	Violation Description
15	Missing ownership sign.
16	Missing ownership sign.
18	Missing ownership sign.
21	Missing ownership sign.
23	Missing ownership sign.

4. 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.”

Location	Violation Description
25	Terminal cover open.
53	Frontier needs to transfer its facilities to the new pole.
54	Fishing lines in Frontier Lines.
65	Missing high-vis strips.
85	Frontier needs to transfer its facilities to the new pole.
89	Frontier needs to transfer its facilities to the new pole.
110	Frontier needs to transfer its facilities to the new pole.

5. 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.”

Location	Violation Description
25	Idle service line left on ground.
76	Idle line hanging down pole.
93	Idle service line hanging down pole.
95	Idle service line hanging down pole.
49	Idle service line hanging midspan about 8 feet high.
50	Idle service line hanging down midspan about 6 feet high.

6. GO 95, Rule 35, Vegetation Management states in part:

“When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule.”

Location	Violation Description
37	Vegetation causing strain/abrasion to line resulting in broken lashing wire.

7. 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.”

Location	Violation Description
61	Loose down guy and damaged anchor.
64	Loose down guy.

78	Loose down guy and bent anchor.
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8. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19 Column C states:

“The basic minimum allowable radial separation between guys passing conductors supported on the same pole is 3 inches.”

Location	Violation Description
95	Frontier service line contacting SCE down guy.

9. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 5 Column B states in part:

“The basic minimum allowable vertical clearance of a communication conductor and supply service drop in an above ground area accessible to pedestrians only is 10 feet [...]

***Exception (Rule 84.4-A(3)) Accessible to Pedestrians Only:** 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.”*

Location	Violation Description
97	Low service drop about 5 feet high.

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

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

Location	Violation Description
100	Climbing space obstructed by vegetation.

V. Field Observations

ESRB staff observed the following third-party potential safety concerns during the field inspection:

GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities states in part:

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property...”

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

“(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.

Note: Each pole owner must be able to determine all other pole owners on poles it owns. Each pole owner must be able to determine all authorized entities that attach equipment on its portion of a pole.”

Location	Violation Description
10	Idle Cable TV line.
12	Abandoned Cable TV line.
17	Liberty primary down guy in contact with primary neutral.
17	Two Liberty primary down guys in contact with Frontier Line.
40	Idle Cable TV coax lines on ground.
58	Idle Cable TV line hanging down pole.

61	Edison down guy is loose.
73	Cable TV service line low about 8 inches from ground.
76	Idle Cable TV line hanging down pole.
85	Cable TV needs to transfer its facilities to the new pole.
89	Cable TV needs to transfer its facilities to the new pole.
94	SCE tree connect service drop missing insulator.
95	SCE secondary down guy touching service drop insulator/bracket.