PUBLIC UTILITIES COMMISSION

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April 18, 2025 CA2024-1241

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

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Frontier's Alturas Region

Ms. Smith:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell and Stephen Lee of ESRB staff conducted a CIP audit of Frontier Alturas Region from September 30, 2024 through October 04, 2024. 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 is enclosed. Please provide a response no later than May 16, 2025, 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.

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 Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

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 Findings of Frontier Alturas Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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FRONTIER ALTURAS REGION
COMMUNICATIONS AUDIT FINDINGS
SEPTEMBER 30 - OCTOBER 04, 2024

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Frontier Alturas Region:

- Facility statistics as of August 2024, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Overhead (OH) and Underground (UG) facility maps as of August 2024.
- Current and previous versions of wired and wireless, OH and UG maintenance policies, procedures, and programs, that were effective from August 2019 through August 2024 for compliance with GOs 95 and 128.
- Inspection and patrol records containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings and repairs from August 2019 through August 2024.
- Notification records for wired and wireless, OH and UG facilities containing data for inspected facility type, facility location, fire threat district location, repair, due date and completed date from August 2019 through August 2024.
- Safety Hazards Notifications received from third-party utilities from August 2019 through August 2024.
- Safety Hazards Notifications sent to third-party utilities from August 2019 through August 2024.
- Pole loading calculations, including intrusive testing for Tier 2 and Tier 3 High Fire Threat Districts from August 2023 through August 2024.
- Current inspector training program for compliance with GO 95 and 128.
- New construction projects from August 2023 through August 2024.

II. Records Violations

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

1. **General Order (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."*

GO 128, Rule 42.2, Manholes and Handholes, Maintenance and Inspection states:

> *"See rules 12.2 and 17.2"*

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."*

ESRB reviewed Frontier's patrol and inspection records from August 2019 through August 2024. Frontier did not provide any underground inspection records from the applicable time period. Frontier's Inspection Program also fails to assign inspection intervals to its underground assets. Frontier must update its program and maintain records of its inspections to comply with the requirements of GO 128, Rule 17.2.

2. **GO 95, Rule 18-B, Maintenance Programs** states in part:

> *"Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.*
>
> *The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities."*

(1) "Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.

a. 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 reviewed Frontier's Alturas area corrective notifications from August 2019 through August 2024 and found that Frontier has twelve late notifications out of 117 (10.3%) total. Table 1 breaks down the total late notifications for the Alturas area by priority.

Table 1: Alturas Region Late Notifications

Priority Levels	Late Pending	Late Complete	Total
1	0	1	1
2	2	9	11
3	0	0	0
Total	2	10	**12**

Table 1 includes both late complete notifications and the late pending notifications for each priority. Late completed notifications are any notifications completed after the due dates that apply to the notifications' priority level per GO 95, Rule 18-B. Late pending notifications are any notifications that were still open with a due date prior to August 01, 2024.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
1	616144	Pole	41.487256, -120.54507
2	616145	Pole	41.487244, -120.5458
3	616219	Pole	41.4872, -120.546559
4	616216	Pole	41.486733, -120.546609
5	616220	Pole	41.487241, -120.547152
6	615793	Pole	41.487276, -120.563834
7		Pedestal	41.487267, -120.563819
8		Vault	41.487261, -120.563828
9		Pedestal	41.487367, -120.564123
10	616255	Pole	41.488913, -120.559417
11		Pole	41.489019, -120.559438
12	616254	Pole	41.489612, -120.55944
13		Vault	41.489624, -120.559449
14	H1005	Padmount	41.49022, -120.559418
15	616253	Pole	41.490252, -120.559394
16		Pedestal	41.490823, -120.556575
17	617190	Pole	41.490902, -120.556569
18	617286	Pole	41.490426, -120.537767
19	617285	Pole	41.489989, -120.537783
20	617266	Pole	41.490005, -120.537069
21	617276	Pole	41.49, -120.536537
22	Xt 1700	Cable Cross Connect	41.489147, -120.539485
23	H1003	Fiber Cabinet	41.489125, -120.539442
24	617374	Pole	41.489166, -120.539381
25	617375	Pole	41.489104, -120.53886
26	617376	Pole	41.489091, -120.538298
27	H1007	Fiber Cabinet	41.50072, -120.54511
28	H1006	Fiber Cabinet	41.500711, -120.545125
29	616294	Pole	41.500684, -120.545131
30	616293	Pole	41.499932, -120.545114
31	616292	Pole	41.49956, -120.545093
32	XT4200	Cable Cross Connect	41.511193, -120.531811
33		Padmount Cabinet	41.511193, -120.531831
34	617123	Pole	41.511154, -120.531811
35	617122	Pole	41.511324, -120.5318
36	T34	Pole	41.230628, -120.489513
37		Pole	41.230575, -120.490138
38		Pole	41.230571, -120.490893

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
39		Pole	41.23112, -120.504083
40		Pole	41.230579, -120.504009
41	T15	Pole	41.230089, -120.503991
42	T65	Pole	41.229991, -120.503759
43		Pole	41.480883, -120.540982
44	616742	Pole	41.480886, -120.541379
45	616740	Pole	41.480869, -120.54181
46	616739	Pole	41.48084, -120.542265
47	H1002	Fiber Cabinet	41.483814, -120.538744
48	616666	Pole	41.483839, -120.53874
49	VZ 286229	Pole	41.48402, -120.538779
50	616616	Pole	41.484079, -120.538137
51		Pole	41.123318, -121.223827
52		Pole	41.123374, -121.223591
53	T-52	Pedestal	41.123365, -121.223583
54		Pole	41.123883, -121.221813
55	T-55	Pedestal	41.123893, -121.221838
56		Pole	41.123303, -121.221198
57		Pole	41.123238, -121.220549
58		Pole	41.097434, -121.184625
59		Pole	41.097226, -121.184393
60		Pole	41.097266, -121.184158
61		Pole	41.097572, -121.183716
62	45	Pole	41.120433, -121.144452
63		Pole	41.120063, -121.144469
64	10	Pole	41.110076, -121.148009
65	13	Pole	41.108136, -121.148027
66	Danny	Pedestal	41.146734, -121.068819
67	339	Pedestal	41.146747, -121.071743
68		Pole	41.123066, -120.984671
69	T164LP7	Pedestal	41.123056, -120.984672
70	205	Pole	41.192257, -120.942529
71		Pole	41.192156, -120.942485
72		Pole	41.192672, -120.942366
73		Pole	41.193221, -120.942417
74	265	Pole	41.193615, -120.942393
75		Pole	41.193813, -120.942463
76	6	Pole	41.260937, -120.897767
77		Pole	41.261084, -120.897713
78	352	Pole	41.261091, -120.89759
79	5	Pole	41.278796, -120.893083
80		Pole	41.278397, -120.893464

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
81		Pole	41.277855, -120.894261
82		Pole	41.285938, -120.891304
83		Pole	41.286308, -120.890882
84		Pole	41.286398, -120.890906
85		Pole	41.365919, -120.957197
86		Pole	41.366034, -120.957387
87		Pole	41.366306, -120.957471
88		Pedestal	41.359326, -120.996176
89		Pole	41.359317, -120.996154
90		Pole	41.86361, -120.158861
91		Pole	41.862844, -120.158223
92		Pole	41.862235, -120.157474
93	T33	Pedestal	41.835325, -120.172448
94		Pole	41.835072, -120.172537
95	LP 8	Pedestal	41.751466, -120.190674
96		Pole	41.646498, -120.215447
97		Pole	41.646151, -120.215626
98		Pole	41.646826, -120.215921
99		Pedestal	41.646794, -120.215949
100	60	Pole	41.607311, -120.205378
101	59	Pole	41.608044, -120.205662
102	145	Pole	41.608473, -120.205822
103		Pole	41.527468, -120.143002
104		Pole	41.527053, -120.143022
105		Pole	41.526575, -120.143002
106		Pole	41.521979, -120.14302
107		Pole	41.522436, -120.143024
108		Pole	41.522954, -120.143015
109		Pole	41.795246, -120.36719
110	500	Pedestal	41.674403, -120.382903
111		Pole	41.50553, -120.435064
112		Pole	41.505227, -120.435525
113	T1190	Pole	41.504975, -120.435953
114		Pole	41.50463, -120.436511
115		Pole	41.504197, -120.437237

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 related to the above rule are listed in Table 2:

Table 2: GO 95, Rule 31.1 Findings

Location	Findings
2	Needs a proper splice box
34	Splice box not secured
40	Missing Hi-vis strip by road
41	Missing Hi-vis strip by road
79	Pole has significant woodpecker damage
90	Pole is decayed
106	Splice cover is broken
108	Pole is decayed
112	Missing Hi-vis strip by road

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 related to the above rule are listed in Table 3:

Table 3: GO 95, Rule 31.6 Findings

Location	Findings
6	Abandoned service drop
96	Abandoned service drop
98	Abandoned ground wire

3. **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 related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 84.6-B Findings

Location	Findings
21	Exposed ground wire
35	Exposed ground wire
36	Exposed ground wire
76	Exposed ground wire
81	Exposed ground wire
115	Exposed ground wire

4. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, etc.** states:

"Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.

The clearances specified in Table 1, Case 1, Columns A, B, D, E and F, shall in no case be reduced more than 5% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions. The clearances specified in Table 1, Cases 2 to 6 inclusive, shall in no case be reduced more than 10% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions.

The clearance specified in Table 1, Case 1, Column C (22.5 feet), shall in no case be reduced below the tabular value because of temperature and loading as specified in Rule 43.

The clearances specified in Table 1, Cases 11, 12 and 13, shall in no case be reduced below the tabular values because of temperatures and loading as specified in Rule 43.

Where supply conductors are supported by suspension insulators at crossings over railroads which transport freight cars, the initial clearances shall be sufficient to prevent reduction to clearances less than 95% of the clearances specified in Table 1, Case 1, through the breaking of a conductor in either of the adjoining spans.

Where conductors, dead ends, and metal pins are concerned in any clearance specified in these rules, all clearances of less than 5 inches shall be applicable from surface of conductors (not including tie wires), dead ends, and metal pins, except clearances between surface of crossarm and conductors supported on pins and insulators (referred to in Table 1, Case 9) in which case the minimum clearance specified shall apply between center line of conductor and surface of crossarm or other line structure on which the conductor is supported.

All clearances of 5 inches or more shall be applicable from the center lines of conductors concerned.

When measuring the minimum allowable vertical conductor clearances in a span, the minimum clearance applies to the specific location under the span being measured and not for the entire span."

ESRB's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 37 Findings

Location	Findings
19	Low service drop
39	Excess fiber hanging too low
50	Low service drop due to broken lashing
61	Low service drop
64	Low span
106	Low span

5. **GO 95, Rule 38, Minimum Clearance of Wires from Other Wires** states in part:

> *"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive."*

ESRB's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 38 Findings

Location	Findings
5	Phone attached to electric service
18	Improper clearance to cable

6. **GO 95, Rule 92.4-C(2)(c), Grounding** states in part:

> *"Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground."*

ESRB's findings related to the above rule are listed in Table 7:

Table 7: GO 95, Rule 92.4-C(2)(c) Findings

Location	Findings
35	Exposed ground rod
49	Exposed ground rod

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."

   ESRB's findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 86.2 Findings

Location	Findings
108	Guy has broken away from anchor
109	Slack guy
111	Improper tension and angle on queens post

8. **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 related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 86.9 Findings

Location	Findings
41	Missing guy guard
77	Missing guy guard
92	Missing guy guard

Location	Findings
109	Missing guy guard
115	Missing guy guard

9. **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 related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 87.7-D(1) Findings

Location	Findings
34	Missing riser guard
42	Missing riser guard
52	Missing riser guard
54	Riser guard is not 8 feet
68	Missing riser guard
109	Riser guard is not 8 feet

10. **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 finding related to the above rule is listed in Table 11:

Table 11: GO 128, Rule 17.1 Finding

Location	Finding
93	Pedestal damaged

11. 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 finding related to the above rule is listed in Table 12:

Table 12: GO 128, Rule 17.8 Finding

Location	Finding
9	Illegible ownership sticker

12. GO 128, Rule 43.3A, Buried Cables and Conductors, Clearances and Depths, Independently Installed states:

"Buried communication cables and conductors, when independently installed, shall be separated where practicable from supply system ducts and buried cables or conductors by not less than 3 inches of concrete, 4 inches of brick masonry, or 12 inches of earth."

ESRB's findings related to the above rule are listed in Table 13:

Table 13: GO 128, Rule 43.3A Findings

Location	Findings
66	Buried cable is exposed above ground
67	Buried cable is exposed above ground for approximately 1 mile
110	Buried cable is exposed above ground

V. Observations

1. **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 18-A, 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 GO 95."

   During the field inspection, ESRB noted the third-party safety concerns listed in Table 14.

Table 14: Third-Party Observations

Location	Entity	Violation Description
10	Charter	Cable drop on Frontier span

Location	Entity	Violation Description
26	PacificCorp	Remove Buddy pole
26	Charter	Slack down guy
51	Unknown	Clearance on span
52	Unknown	Exposed ground rod
52	Unknown	Ground missing cover
56	Unknown	Pole sounds hollow when struck, needs replace
57	PG&E	Pole deteriorated, woodpecker damage
78	Surprise Valley	Down guy missing marker
94	Surprise Valley	Abandoned service