

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 24, 2025

CA2025-1212

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

SUBJECT: Audit of Frontier Communications ("Frontier") Kern County West District

Ms. Geise:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Jose Lastra of my staff conducted a Communication Infrastructure Provider (CIP) audit of Frontier's Kern County West District on March 24-28, 2025. The audit included a review of Frontier's inspection and maintenance records and a field inspection of Frontier's communication facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than July 25, 2025, by electronic or hard copy, of all corrective measures taken by Frontier to remedy 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, you can contact Jose Lastra (213) 507-1438 or jose.lastra@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: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Jose Lastra, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead detailed and patrol inspections records
- Completed and pending corrective action work orders
- Pole loading calculations
- Frontier's Overhead Lines Maintenance Plan
- Frontier's Visual Inspections of Overhead Lines

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 95, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...

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.

From January 2020 to December 2024, Frontier completed 83 overhead work orders beyond Frontier's scheduled due date for corrective action. Additionally, Frontier had 61 open overhead work orders that were past Frontier's scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID	Structure Type	Location
1	110529581	Wood Pole	Lost Hills
2	110529578	Wood Pole	Lost Hills
3	110304320	Wood Pole	Lost Hills
4	Pole at 14861 Woodward St	Wood Pole	Lost Hills
5	120572350	Wood Pole	Lost Hills
6	120572348	Wood Pole	Lost Hills
7	120572347	Wood Pole	Lost Hills
8	110419511	Wood Pole	Lost Hills
9	120572345	Wood Pole	Lost Hills
10	120572346	Wood Pole	Lost Hills
11	120573821	Wood Pole	Lost Hills
12	120572344	Wood Pole	Lost Hills
13	122227082	Wood Pole	Lost Hills
14	120572336	Wood Pole	Lost Hills
15	VZ103754	Wood Pole	Lost Hills
16	1 Pole North of VZ103754	Wood Pole	Lost Hills
17	CTC1202146	Wood Pole	Lost Hills
18	Pedestal Adjacent to CTC1202146	Pedestal	Lost Hills
19	1 Pole W of CTC1202146	Wood Pole	Lost Hills
20	2 Poles W of CTC1202146	Wood Pole	Lost Hills
21	120951379	Wood Pole	McKittrick
22	1 Pole S of 120951379	Wood Pole	McKittrick
23	120951380	Wood Pole	McKittrick
24	120951382	Wood Pole	McKittrick
25	120104313	Wood Pole	McKittrick
26	110099703	Wood Pole	McKittrick
27	CTC 1203859	Wood Pole	McKittrick
28	110099704	Wood Pole	McKittrick
29	110501728	Wood Pole	McKittrick
30	110501727	Wood Pole	McKittrick
31	120951377	Wood Pole	McKittrick
32	120951385	Wood Pole	McKittrick
33	120951384	Wood Pole	McKittrick
34	120951383	Wood Pole	McKittrick
35	CTC217653	Wood Pole	McKittrick
36	CT208892	Wood Pole	McKittrick
37	CT217652	Wood Pole	McKittrick
38	CT208891	Wood Pole	McKittrick
39	120951438	Wood Pole	McKittrick
40	120951439	Wood Pole	McKittrick
41	120951427	Wood Pole	McKittrick

42	120951428	Wood Pole	McKittrick
43	120951429	Wood Pole	McKittrick
44	120951432	Wood Pole	McKittrick
45	120951433	Wood Pole	McKittrick
46	122087086	Wood Pole	Buttonwillow
47	122234221	Wood Pole	Buttonwillow
48	120760428	Wood Pole	Buttonwillow
49	CTC1201787	Wood Pole	Buttonwillow
50	CTC1201788	Wood Pole	Buttonwillow
51	121780206	Wood Pole	Buttonwillow
52	121740283	Wood Pole	Buttonwillow
53	CTC1201790	Wood Pole	Buttonwillow
54	121780207	Wood Pole	Buttonwillow
55	121780208	Wood Pole	Buttonwillow
56	121780209	Wood Pole	Buttonwillow
57	1 Comm Pole W of 121780208	Wood Pole	Buttonwillow
58	120181480	Wood Pole	Buttonwillow
59	CTC1201797	Wood Pole	Buttonwillow
60	110412079	Wood Pole	Buttonwillow
61	121780218	Wood Pole	Buttonwillow
62	120938179	Wood Pole	Buttonwillow
63	122233371	Wood Pole	Buttonwillow
64	121780219	Wood Pole	Buttonwillow
65	121780221	Wood Pole	Buttonwillow
66	121780222	Wood Pole	Buttonwillow
67	121780220	Wood Pole	Buttonwillow
68	120499296	Wood Pole	Taft
69	120499298	Wood Pole	Taft
70	120499326	Wood Pole	Taft
71	120499327	Wood Pole	Taft
72	120499350	Wood Pole	Taft
73	120499349	Wood Pole	Taft
74	120499328	Wood Pole	Taft
75	120499348	Wood Pole	Taft
76	120499329	Wood Pole	Taft
77	120499347	Wood Pole	Taft
78	CTC1154988	Wood Pole	Taft
79	120499330	Wood Pole	Taft
80	120499331	Wood Pole	Taft
81	120499332	Wood Pole	Taft
82	CTC1203536	Wood Pole	Taft
83	308 Main St	Manhole	Taft
84	XT-4200	Pad Terminal (B Box)	Taft
85	Manhole adjacent to XT-4200	Manhole	Taft
86	REP-1	Repeater	Taft
87	1200 4th St	Manhole	Taft

88	Handhole adjacent to 120988644	Handhole	Taft
89	REP-2	Repeater	Taft
90	Pedestal at 1200 4th St	Pedestal	Taft
91	H4007	Fiber Hub	Taft
92	Sub Box adjacent to H4007	Vault (Sub Box)	Taft
93	424 McKinley St	Handhole	Taft
94	423 McKinley St	Handhole	Taft
95	2609	Wood Pole	Taft
96	120500351	Wood Pole	Taft
97	120301350	Wood Pole	Taft
98	120301347	Wood Pole	Taft
99	120301346	Wood Pole	Taft
100	120301348	Wood Pole	Taft
101	CTC1203127	Wood Pole	Taft

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections 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.

A PG&E conduit riser supported on Pole 120572336 was damaged at the public level, exposing the conductor. Frontier did not notify the responsible third-party of the safety hazard.

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.

The Frontier facilities on each of the following poles required maintenance:

- Pole at 14861 Woodward St – a Frontier service drop was touching a broken PG&E down guy wire.
- CTC 1203859 – Frontier’s facilities on the buddy pole need to be transferred to the new pole
- 120951383 – the Frontier service splice box attached to the pole was left open
- CTC1201787 – Frontier’s facilities on the buddy pole need to be transferred to the new pole
- 120181480 – (1) Frontier’s splice box was damaged, exposing the conductor; (2) there was a damaged clamp supporting bolt on the pole; (3) a rope was being used to support a conductor
- 120499296 – Frontier had a loose bolt on the eye nut [located at the second conductor level starting from the bottom]
- 120499329 – the Frontier ground wire was cut at the public level
- 120499331 – (1) Frontier had multiple hanging or damaged riser straps; (2) additionally, there was an unsecured Frontier terminal box hanging from the wall of an adjacent building at the public level
- 120500351 – Frontier had a broken span guy wire hanging around the pole at the public level
- CTC1203127 – a Frontier service drop was hanging from the conductor and unsecured to the pole at the public level

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.

A Frontier communications cable attached to each of the following poles was permanently abandoned and should be removed:

- 120572350 – a Frontier service drop was disconnected and hanging from the conductor at the public level
- 120951379 – a Frontier service drop was disconnected and hanging from the conductor at the public level
- 1 Pole S of 120951379 – a disconnected Frontier service drop was hanging from the pole and lying on the ground
- 120951382 – a Frontier service drop was hanging from the conductor and wrapped around a nearby fence
- 120951439 – a disconnected Frontier service drop was wrapped around the pole and hanging at the public level
- 120951429 – a Frontier conductor was disconnected and lying on the ground
- 120951433 – a Frontier service drop was disconnected and hanging from the conductor at the public level

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, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.

The ground moulding attached to each of the following poles was damaged:

- 120951383
- 120499329

GO 95, Rule 84.4 –D, Clearances, From Poles and Crossarms states in part:

Table 1, Case 8, Column B specifies a minimum clearance of 15 inches from center line of pole which is applicable to communication conductors including cables and service drops. Modifications of this basic 15 inches clearance are specified in Rule 37 and by the following provisions where conductors are not on poles jointly used for supporting supply conductors excepting VIII-23 January 2020 Rule 84.4-D1b supply service drop clearance attachments (see Rules 54.8–C2 and 54.8–C3).

The following Frontier communications conductors did not have the minimum required clearance of 15 inches from the center line of a pole to which it was not attached:

- A Frontier communications conductor was touching Pole VZ103754 to which it was not attached.
- A Frontier communications conductor was touching an unmarked pole, located one pole north of VZ103754, to which it was not attached.

GO 95, Rule 84.8-C3(b), Service Drops, Clearances above Ground and Buildings, Above Ground in Areas Accessible to Pedestrians Only, Residential Premises states in part:

Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet. EXCEPTION: If the building served does not permit an attachment which will provide this 10 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches.

A Frontier communications service drop supported on Pole 120572344 and servicing a nearby home had an above ground vertical clearance of less than 8 feet, 6 inches in a pedestrian accessible area.

GO 95, Rule 84.8-C4, Service Drops, Clearances above Ground and Buildings, From Buildings and Structures states in part:

Service drops are not required to clear the roofs of buildings on the premises served any specified vertical distance. The vertical clearance above buildings on premises other than the one being served shall not be less than 8 feet, except that a reduction to not less than 2 feet is permitted under either of the following conditions.

A Frontier service drop supported on Pole CTC1201787 was touching the roof of the home it was servicing.

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.

The Frontier down guy wire supporting Pole 120951385 was not taut.

GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground:

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

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

The Frontier riser conduit attached to each of the following poles was damaged:

- 110529581
- 120951377

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.

The following Frontier underground facilities required maintenance:

- The Frontier pedestal adjacent to CTC1202146 had an unsecured/unlocked cover.
- The Frontier pedestal at 1200 4th St had an unsecured/unlocked cover.