

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



July 7, 2025

CA2025-1315

Jenny Smith
Director, Regulatory & Government Affairs
9260 E. Stockton Blvd.
Elk Grove, CA 95624

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Burney and Fall River Mills region.

Ms. Smith:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio, Nora Nguyen and Rafael Herranz of ESRB staff conducted a CIP audit of Frontier's Burney and Fall River Mills region from April 14 to April 18, 2025. 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 one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than August 4, 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 the audit on the CPUC website. If there is any information in your response that you want 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 Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@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's Burney and Fall River Mills Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Eric Wu, Program Manager, Safety and Enforcement Division, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC

Yi “Rocky” Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC
Rafael Herranz, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Judy Geise, Manager, Regulatory, Frontier

**CPUC AUDIT FINDINGS OF FRONTIER
BURNEY & FALL RIVER MILLS REGION**

APRIL 14 – 18, 2025

I. Records Review

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

- Frontier’s Inspection & Maintenance Procedures, January 2025
- Frontier’s Facility Statistics of Burney and Fall River Mills Region
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the Last 5 Years (February 2020 – January 2025)
- Most Recent Work Orders Conducted in the Last 5 Years (February 2020 – January 2025)
- Pole Loading Calculations Conducted in the Last 5 Years (February 2020 – January 2025)
- Safety Hazard Notifications Frontier Received and Sent to Third Parties in the Last 5 Years (February 2020 – January 2025)
- Employee statistics
- Records for Intrusive Pole Inspections Conducted in the Last 5 Years (February 2020 – January 2025)
- New Construction Projects Completed in the Last 12 Months

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 work orders from February 2020 through January 2025 found that 165 out of 1,388 (or 12%) pending work orders are overdue and 84 out of 448 (or 19%) closed work orders were completed late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 249 late work orders by hazard level.

Table 1: Late Work Orders

Hazard Level	Late-Pending Work Orders¹	Late-Closed Work Orders	Total Late Work Orders
1	N/A	1	1
2a	2	1	3
2b	123	75	198
2c	40	7	47
Total	165	84	249

Frontier must provide ESRB with its corrective action plan to complete the 165 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
1	TK3182922	529
2a	TK3153937	83

¹ As of January 31, 2025.

2b	TK1808665	1,000
2c	TK1541058	643

Frontier identified work order #TK3182922 on September 17, 2023, to repair a broken pole with a required finish date of September 18, 2023. The work order was completed on February 28, 2025 indicating it was 529 days past the required finish date of September 18, 2023.

Frontier identified work order #TK3153937 on August 20, 2023, for a low hanging conductor. According to Frontier maintenance procedures, a 2a priority work order requires completion within 6 months. This would require the work order to be completed by February 20, 2024. The work order spreadsheet incorrectly listed a target finish date of August 21, 2023. The work order was completed on May 13, 2024 indicating it was 83 days past the required finish date of February 20, 2024.

Frontier identified work order #TK1808665 on November 12, 2020, to remove an abandoned service drop with a required finish date of November 24, 2021. The work order was completed on August 20, 2024 indicating it was 1,000 days past the required finish date of August 20, 2024.

Frontier identified work order #TK1541058 on April 29, 2020, for an unauthorized attachment with a required finish date of April 29, 2023. Frontier has not yet completed the work.

The work order spreadsheet also had four work orders with a level 4 priority. The Frontier Inspection and Maintenance Procedure does not reference or mention what a level 4 priority level indicates. A level 4 priority work order must be explained/defined in the Frontier Inspection and Maintenance Procedure.

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.”

The inspection list spreadsheet did not include any inspection of Frontier’s underground facilities between February 2020 and January 2025. Frontier is required to inspect underground facilities frequently and thoroughly for the purpose of insuring that they are in good condition.

III. Field Inspection

During the field inspection from April 14 – April 18, 2025, ESRB staff inspected Frontier’s communication facilities in the locations listed in Table 3.

Table 3: Field Inspection Locations

Location #	Address/GPS Location	Structure Type	Structure #
1	44292 CA-299 McArthur, CA	B-Box	N/A
2	44292 CA-299 McArthur, CA	AFC Box	N/A
3	44353 CA-299 McArthur, CA	Pole	N/A
4	44269 CA-299 McArthur, CA	Pole	N/A
5	(41.0506943, -121.3952002)	Pole	N/A
6	(41.0507942, -121.3983545)	Pole	120193097
7	(41.0483787, -121.3961876)	Pole	N/A
8	44230 Walnut St. McArthur, CA	Pole	658
9	44218 Walnut St. McArthur, CA	Pole	657
10	44210 Walnut St. McArthur, CA	Pole	120551258
11	44182 Cedar St. McArthur, CA	Pole	N/A
12	44129 Cedar St. McArthur, CA	Pole	621
13	25139 Reynolds Rd. Fall River Mills, CA	Pole	T348
14	25004 Shasta St. Fall River Mills, CA	Pole	N/A
15	(41.0066098, -121.4389453)	Pole	N/A
16	(41.0052498, -121.4397400)	Pole	8367
17	24894 3 rd St. Fall River Mills, CA	Pole	110469335
18	(41.0017897, -121.4380713)	Pole	N/A
19	43195 Bridge St. Fall River Mills, CA	Pole	N/A
20	Southwest C/O Bridge St. & Main St. Fall River Mills, CA	Pole	121110592
21	43205 Bridge St.	Pole	120969028

Location #	Address/GPS Location	Structure Type	Structure #
	Fall River Mills, CA		
22	(41.0020349, -121.4387465)	Pole	110295962
23	(41.0010484, -121.4421757)	Pole	N/A
24	43088 Bridge St. Fall River Mills, CA	Pole	121317078
25	24852 Long St. Fall River Mills, CA	Pole	N/A
26	24836 Long St. Fall River Mills, CA	Pole	N/A
27	(41.0029982, -121.4467978)	Pole	N/A
28	(41.0028633, -121.4467318)	Pole	39
29	(40.9925963, -121.5052838)	Pole	N/A
30	(40.9924784, -121.5056847)	Pedestal	N/A
31	(40.9924784, -121.5056847)	Pole	1/5
32	(40.9570048, -121.5760260)	Pole	N/A
33	(40.9570048, -121.5760260)	Pole	N/A
34	(40.9569152, -121.5762915)	Pole	6/6
35	(40.9569152, -121.5762915)	Pedestal	N/A
36	(40.9569152, -121.5762915)	B-Box	N/A
37	(41.2653874, -122.1186711)	Pole	N/A
38	(41.2653874, -122.1186711)	Pedestal	N/A
39	(41.2648607, -122.1187509)	Pole	N/A
40	Firenze Ave. & Truck Stop Rd. McCloud, CA	Pole	N/A
41	445 Grove Ave. McCloud, CA	Pole	06239002-063540
42	C/O Grove St. & Colombero Dr. McCloud, CA	Pole	06239002-063505
43	444 Grove Ave. McCloud, CA	Pole	06239002-063504
44	444 Grove Ave. McCloud, CA	Pedestal	N/A
45	(41.2558129, -122.1304188)	Pole	N/A
46	(41.2558691, -122.1309060)	Pole	06239002-062501
47	(41.2515740, -122.1298467)	Pole	N/A
48	200 Shasta Ave. McCloud, CA	Pole	06239002-062211

Location #	Address/GPS Location	Structure Type	Structure #
49	(41.2586371, -122.1394347)	Pole	06239003-017713
50	420 Tucci Ave. McCloud, CA	Pole	06239003-017714
51	505 Wetzel Dr. McCloud	Pole	06239003-017608
52	521 Wetzel Dr. McCloud, CA	Pole	06339003-017609
53	(41.2707714, -122.0402778)	Pole	N/A
54	(41.2707714, -122.0402778)	Pedestal	N/A
55	37906 Clark Creek Rd. Burney, CA	Pole	120003716
56	37921 Clark Creek Rd. Burney, CA	Pole	121112156
57	37971 Clark Creek Rd. Burney, CA	Pole	N/A
58	(40.9234925, -121.6204759)	Pole	P506
59	38233 Pine Ave. Burney, CA	Pole	121180762
60	38255 Pine Ave. Burney, CA	Pole	121180760
61	(40.9214937, -121.6293369)	Pole	121180416
62	(40.9211365, -121.6299860)	Pole	121180415
63	21570 Viola St. Burney, CA	Pole	121288110
64	21590 Viola St. Burney, CA	Pole	121288111
65	20810 Black Ranch Rd. Burney, CA	Pole	121274730
66	(40.8949348, -121.6499856)	Pole	121274738
67	(40.8842555, -121.6472631)	Pedestal	N/A
68	(40.89484, -121.65011)	Pedestal	N/A
69	20543 Mackinac St. Burney, CA	Pole	121946354
70	37338 Superior Ave. Burney, CA	Pole	121533184
71	20530 Mackinac St. Burney, CA	Pole	121288029
72	37263 Superior Ave. Burney, CA	Pole	121274646
73	32275 Superior Ave.	Pole	121274645

Location #	Address/GPS Location	Structure Type	Structure #
	Burney, CA		
74	20484 Superior Ave. Burney, CA	Pole	121274637
75	20379 Crews Way Burney, CA	Pole	N/A
76	20268 Grogan St. Burney, CA	Pole	110453081
77	20267 Grogan St. Burney, CA	Pole	121523959
78	20267 Grogan St. Burney, CA	Pole	121524070
79	37069 Park Ave. Burney, CA	Pole	121184555
80	37061 Park Ave. Burney, CA	Pole	121184554
81	37093 Park Ave. Burney, CA	Pole	121184560
82	20328 Cedar St. Burney, CA	Pole	121184817
83	20324 Cedar St. Burney, CA	Pole	121184818
84	20320 Cedar St. Burney, CA	Pole	121184818
85	Sycamore St. & Antelope Ave. Burney, CA	Pole	121700545
86	(40.8586991, -121.8486112)	Pole	121612710
87	(40.8586651, -121.8481485)	Pole	N/A
88	32379 Moose Ave. Burney, CA	Pole	121612708
89	323370 Moose Ave. Burney, CA	Pole	121612707
90	(40.8586385, -121.8470086)	Pole	FTR 102425
91	32411 Moose Ave. Burney, CA	Pole	SM21116
92	30232 Old Bertagna Pl. Burney, CA	Pole	121612689
93	(40.8382281, -121.9235571)	Pole	121612690
94	(40.8382548, -121.9244332)	Pole	121612691
95	(40.8109827, -121.9391673)	Pole	121548184
96	29775 CA-299 Burney, CA	Pole	121545798

Location #	Address/GPS Location	Structure Type	Structure #
97	29775 CA-299 Burney, CA	Pedestal	N/A
98	29813 Terry Mill Rd. Burney, CA	Pole	121202143
99	29813 Terry Mill Rd. Burney	Pedestal	N/A
100	(40.7873130, -121.9476028)	Pole	N/A
101	(40.7875359, -121.9473936)	Pole	N/A
102	(40.7877595, -121.9471170)	Pole	T254
103	(40.7884205, -121.9459935)	Pole	N/A
104	(40.6940892, -121.1079644)	Pole	N/A
105	(40.6879758, -122.1514195)	Pedestal	N/A

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.

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...”

ESRB’s findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 31.1 Findings

Location #	Findings
18	Facilities need to be transferred to new pole.
20	There was a broken guy wire left on pole.
22	Facilities need to be transferred to new pole.
24	Facilities need to be transferred to new pole.
31	Conductor is not securely attached to pole.
31	Pole has woodpecker damage.
40	There was a broken guy wire left on pole.

Location #	Findings
43	Facilities need to be transferred to new pole.
43	Pole is leaning/broken.
45	Pole is leaning.
69	Conductor is not securely attached to pole.
70	Facilities need to be transferred to new pole.
75	Terminal is missing a cover.
76	Facilities need to be transferred to new pole.
77	Facilities need to be transferred to new pole.
78	Facilities need to be transferred to new pole.

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 5:

Table 5: GO 95, Rule 31.6 Findings

Location #	Findings
4	There was an abandoned service drop.
8	There was an abandoned service drop.
10	There was an abandoned service drop.

Location #	Findings
25	There was an abandoned service drop.
40	There was an abandoned service drop.
86	There was an abandoned service drop.
96	There was an abandoned service drop.
102	There was an abandoned service drop.

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

“Nothing in these rules shall be constructed 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.

Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner’s or owners’ consent.”

ESRB’s finding related to the above rule is listed in Table 6:

Table 6: GO 95, Rule 34 Finding

Location #	Finding
3	There were abandoned foreign facilities attached to the pole.

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

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. 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.”

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

Table 7: GO 95, Rule 35 Findings

Location #	Findings
39	There was vegetation strain on the conductor.
47	There was vegetation strain on the conductor.

5. GO 95, Rule 38, Minimum Clearances 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, Case 8-15, inclusive..."

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

Table 8: GO 95, Rule 38 Findings

Location #	Findings
28	There was a guy wire in contact with a secondary electrical conductor. Table 2 requires a minimum clearance of 3 inches between guys and spans wires passing conductors supported on the same poles.
48	There Frontier conductor was in contact with the electrical guy wire. Table 2 requires a minimum clearance of 3 inches between guys and spans wires passing conductors supported on the same poles.
64	There was a Frontier service drop in contact with another communications service drop. Table 2 requires a minimum clearance of 12 inches between service drops supported on the same pole.

6. 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
4	Guy wire was missing a guy guard.
27	Guy wire was missing a guy guard.
28	Guy wire was missing a guy guard.
34	Guy wire was missing a guy guard.
37	Guy guard was broken.
53	Guy wire was missing a guy guard.

7. GO 95, Rule 84.7A, Climbing Space states:

"Climbing space shall be provided 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 shall be maintained in the same position on the pole for minimum vertical distance of 4 feet above and below each conductor level through which it passes, excepting that where a cable is attached to a crossarm or a pole with the cable less than 9 or 15 inches from the center line of the pole supporting conductors on line arms (no buck arm construction involved) in accordance with the provisions of Rules 84.4-D1 or 87.4-C3, the 4 foot vertical distance may be reduced to not less than 3 feet.

The position of the climbing space shall not be shifted more than 90 degrees around the pole within a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.

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

ESRB’s finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 84.7A Finding

Location #	Finding
39	Vegetation impedes climbing space.

8. GO 95, Rule 84.6B, 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 11:

Table 11: GO 95, Rule 84.6B Findings

Location #	Findings
3	There was an exposed ground wire.
6	There was an exposed ground wire.
9	There was an exposed ground wire.
19	There was broken ground moulding.

Location #	Findings
43	There was an exposed ground wire.
75	There was an exposed ground wire.
89	There was an exposed ground wire.

9. GO 95, Rule 84.8C(2)(b), Residential Premises states:

“Over residential driveways, lanes or over property accessible to vehicles, service drops shall not be less than 12 feet.”

ESRB’s finding related to the above rule is listed in Table 12:

Table 12: GO 95, Rule 84.8C(2)(b) Finding

Location #	Finding
63	There was a low service drop.

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 finding related to the above rule is listed in Table 13:

Table 13: GO 95, Rule 86.2 Finding

Location #	Finding
22	There was a loose guy wire.

11. 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 14:

Table 14: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
5	Riser was broken.
6	Riser was broken.
17	There was no riser for conductor on pole.
69	There was no riser for conductor on pole.
96	There was no riser for conductor on pole.
98	There was no riser for conductor on pole.

12. 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.”

ESRB’s finding related to the above rule is listed in Table 15:

Table 15: GO 128, Rule 17.1 Finding

Location #	Finding
5	There was an unburied conductor at location 5.

13. 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 related to the above rule are listed in Table 16:

Table 16: GO 128, Rule 17.8 Findings

Location #	Findings
1	No mark of ownership on B-box.
2	No mark of ownership on AFC box.
33	No mark of ownership on pedestal.
35	No mark of ownership on pedestal.
36	No mark of ownership on B-box.
38	No mark of ownership on pedestal.
44	No mark of ownership on pedestal.
54	No mark of ownership on pedestal.
67	No mark of ownership on pedestal.
68	No mark of ownership on pedestal.
97	No mark of ownership on pedestal.
99	No mark of ownership on pedestal.
105	No mark of ownership on pedestal.

V. Observations

1. 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.”

ESRB’s findings related to the above Rule are listed in Table 17:

Table 17: GO 95, Rule 18-A Findings

Location #	Findings
6	Unauthorized attachment due to abandoned facilities left on electrical pole.
13	Unauthorized attachment due to abandoned facilities left on electrical pole.
16	Cable TV guy wire was loose.
22	Unauthorized attachment due to abandoned facilities left on electrical pole.
25	Unauthorized attachment due to abandoned facilities left on electrical pole.
42	Electrical ground wire was exposed.
46	Electrical guy wire was loose.
50	Unauthorized attachment due to abandoned facilities left on electrical pole.

61	Cable TV ground wire was exposed.
64	Cable TV service drop was in contact with Frontier service drop.
64	Pole was decayed and had woodpecker damage.
69	Cable TV conductor had no riser and was not attached to pole.
70	Cable TV guy wire was loose.
71	Cable TV had an abandoned service drop.
72	Electrical pole was leaning.
74	Cable TV had an abandoned service drop.
75	Cable TV conductor had no riser.
76	Cable TV needs to transfer facilities.
77	Cable TV needs to transfer facilities.
78	Cable TV needs to transfer facilities.