

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 30, 2025

CA2025-1336

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

**SUBJECT:** Audit of Frontier Communications ("Frontier") Kern County East 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 Communications Kern County East District from September 8-12, 2025. The audit included a review of Frontier Communications' inspection and maintenance records and a field inspection of Frontier Communications' 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 January 30, 2026, by electronic or hard copy, of all corrective measures taken by Frontier Communications 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](mailto:jose.lastra@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Derek Fong".

Derek Fong, P.E.  
Senior Utilities Engineer, Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosures: CPUC Audit Findings

Cc: Leslie Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water  
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 and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Safety hazard notifications
- Pole-loading calculations
- Frontier's documented inspection program

### **II. Records Review – Violations List**

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

**GO 95, Rule 80.1-A1, Inspection Requirements for Joint-Use Poles in High Fire-Threat Districts**, states in part:

*In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table.*

**GO 95, Rule 31.2, Inspection of Lines**, states in part:

*Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

Frontier's records indicated that from August 2020 to August 2025, Frontier completed 1,660 overhead patrols and 134 overhead patrols in in Tier 2 and Tier 3 HFTDs, respectively, past the required due date.

**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.*

Frontier's records indicated that from August 2020 to August 2025, Frontier completed 1,065 overhead work orders past Frontier's due date for corrective action. Additionally, as of the date of the audit, Frontier had 2,253 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	Coordinates
1	730871E	Wood Pole	Weldon	35.663197, -118.306111
2	Secondary Pole Adjacent to 730871E	Wood Pole	Weldon	35.663197, -118.306089
3	4956834E	Wood Pole	Weldon	35.662911, -118.306289
4	730872E	Wood Pole	Weldon	35.659889, -118.307644
5	4956835E	Wood Pole	Weldon	35.661394, -118.306889
6	730873E	Wood Pole	Weldon	35.659672, -118.307786
7	1494151E	Wood Pole	Weldon	35.659325, -118.307783
8	1494152E	Wood Pole	Weldon	35.659267, -118.307767
9	1494153E	Wood Pole	Weldon	35.659253, -118.307764
10	818117E	Wood Pole	Weldon	35.659425, -118.307792
11	1799218E	Composite Pole	Weldon	35.658128, -118.307311
12	818119E	Wood Pole	Weldon	35.658128, -118.307311
13	120033CIT	Wood Pole	Weldon	35.691619, -118.226772
14	4957030E	Wood Pole	Onyx	35.692150, -118.227158
15	1761277E	Wood Pole	Onyx	35.691297, -118.226900
16	1761278E	Wood Pole	Onyx	35.691192, -118.227378
17	1761279E	Wood Pole	Onyx	35.690672, -118.226989
18	4512813E	Wood Pole	Onyx	35.689792, -118.227017
19	1761281E	Wood Pole	Onyx	35.689983, -118.227300
20	1761282E	Wood Pole	Onyx	35.689714, -118.227133
21	2331801E	Wood Pole	Onyx	35.689278, -118.226925
22	1761284E	Wood Pole	Onyx	35.688678, -118.227367
23	4720276E	Wood Pole	Onyx	35.690706, -118.226556
24	1737260E	Wood Pole	Onyx	35.690772, -118.226583
25	1737261E	Wood Pole	Onyx	35.690808, -118.226539
26	1737262E	Wood Pole	Onyx	35.689950, -118.226225
27	1997025E	Wood Pole	Onyx	35.690197, -118.225314
28	1997024E	Wood Pole	Onyx	35.689742, -118.225781
29	1903176E	Wood Pole	Onyx	35.646642, -117.812647
30	4453176E	Wood Pole	Inyokern	35.646642, -117.812647
31	buddy pole by 4453176E	Wood Pole	Inyokern	35.647433, -117.812811
32	1778679E	Wood Pole	Inyokern	35.648078, -117.812617
33	1744302E	Wood Pole	Inyokern	35.648333, -117.813681
34	1744301E	Wood Pole	Inyokern	35.649031, -117.812925
35	1744294E	Composite Pole	Inyokern	35.649483, -117.813025
36	1744293E	Wood Pole	Inyokern	35.649475, -117.813031
37	1 Pole SW of 1744293E	Wood Pole	Inyokern	35.649994, -117.813219
38	1744292E	Wood Pole	Inyokern	35.647222, -117.810358
39	1744289E	Wood Pole	Inyokern	35.651042, -117.813339
40	1744288E	Wood Pole	Inyokern	35.651042, -117.813339

41	1744287E	Wood Pole	Inyokern	35.651042, -117.813339
42	Pedestal Adjacent to Pole 1744287E	Pedestal	Inyokern	35.651417, -117.813506
43	1744295E	Wood Pole	Inyokern	35.651617, -117.813592
44	2180189E	Wood Pole	Inyokern	35.651628, -117.813611
45	1744285E	Wood Pole	Inyokern	35.651628, -117.813611
46	1 Pole N of 1744285E	Wood Pole	Inyokern	35.651622, -117.813669
47	130/25	Wood Pole	Inyokern	35.651928, -117.813728
48	Repeater 1-1	Repeater	Inyokern	35.651928, -117.813728
49	Repeater 2-1	Repeater	Inyokern	35.651931, -117.814903
50	Pedestal Adjacent to Pole 130/25	Pedestal	Inyokern	35.652028, -117.813764
51	130/24	Wood Pole	Inyokern	35.652231, -117.813822
52	130/23	Wood Pole	Inyokern	35.617292, -117.681325
53	4860379E	Wood Pole	Ridgecrest	35.617975, -117.681075
54	4860380E	Wood Pole	Ridgecrest	35.617842, -117.681394
55	1615834E	Wood Pole	Ridgecrest	35.617894, -117.681189
56	4241378E	Wood Pole	Ridgecrest	35.617814, -117.681450
57	2342620E	Wood Pole	Ridgecrest	35.619075, -117.681328
58	1649839E	Wood Pole	Ridgecrest	35.619075, -117.681328
59	Pedestal Adjacent to Pole 1649839E	Pedestal	Ridgecrest	35.619592, -117.680839
60	4733987E	Wood Pole	Ridgecrest	35.620242, -117.681367
61	4303348E	Wood Pole	Ridgecrest	35.620436, -117.681131
62	2172035E	Wood Pole	Ridgecrest	35.620742, -117.680911
63	4921530E	Wood Pole	Ridgecrest	35.621169, -117.680917
64	4419174E	Wood Pole	Ridgecrest	35.621644, -117.681225
65	4419173E	Wood Pole	Ridgecrest	35.621050, -117.680883
66	2025374E	Wood Pole	Ridgecrest	35.621956, -117.681242
67	4390705E	Wood Pole	Ridgecrest	35.621964, -117.681453
68	1805413E	Wood Pole	Ridgecrest	35.621169, -117.681286
69	1805412E	Wood Pole	Ridgecrest	35.621947, -117.681458
70	10440	Wood Pole	Ridgecrest	35.620942, -117.682575
71	1 Pole W of 10440	Wood Pole	Ridgecrest	35.111814, -117.967831
72	46471S	Wood Pole	California City	35.111778, -117.964133
73	46470	Wood Pole	California City	35.111817, -117.964008
74	4646	Wood Pole	California City	35.111917, -117.963833
75	5806692E	Wood Pole	California City	35.112042, -117.963103
76	4177841E	Wood Pole	California City	35.111961, -117.962878
77	4177842E	Wood Pole	California City	35.112547, -117.962550
78	1900079E	Wood Pole	California City	35.112967, -117.963344
79	5806694E	Wood Pole	California City	35.112967, -117.963344
80	1 Pole W of 5806694E	Wood Pole	California City	35.113681, -117.963497
81	5806693E	Wood Pole	California City	35.113728, -117.963078
82	4739171E	Wood Pole	California City	35.114156, -117.963294
83	4739170E	Wood Pole	California City	35.015308, -117.827106

84	4826831E	Wood Pole	North Edwards	35.015297, -117.827092
85	1 Pole E of 4826831E	Wood Pole	North Edwards	35.016681, -117.828428
86	425133S	Wood Pole	North Edwards	35.016578, -117.828256
87	33630-CIT	Wood Pole	North Edwards	35.016811, -117.828444
88	22238-CIT	Wood Pole	North Edwards	35.016303, -117.827861
89	22257-CIT	Wood Pole	North Edwards	35.016633, -117.828753
90	4867174E	Wood Pole	North Edwards	35.018092, -117.828206
91	VZ76595	Wood Pole	North Edwards	35.018089, -117.828203
92	22240-CIT	Wood Pole	North Edwards	35.017658, -117.828033
93	22258-CIT	Wood Pole	North Edwards	35.017583, -117.828233
94	1702289E	Wood Pole	North Edwards	35.001467, -117.699919
95	25472-CIT	Wood Pole	Boron	35.000281, -117.689842
96	25473-CIT	Wood Pole	Boron	35.000186, -117.690308
97	25474-CIT	Wood Pole	Boron	35.000247, -117.691383
98	25475-CIT	Wood Pole	Boron	35.000247, -117.691383
99	1 Pole W of 25475-CIT	Wood Pole	Boron	35.000228, -117.691894
100	25477-CIT	Wood Pole	Boron	35.000239, -117.692119
101	25478-CIT	Wood Pole	Boron	35.000261, -117.692308
102	25479-CIT	Wood Pole	Boron	35.000261, -117.692308
103	25480-CIT	Wood Pole	Boron	35.001144, -117.700353
104	25481-CIT	Wood Pole	Boron	35.643997, -117.667558
105	CHLKCAXF42	Manhole	Ridgecrest	35.643703, -117.667503
106	CHLKCAXF69	Manhole	Ridgecrest	35.643681, -117.668778
107	CHLKCAXF C54686 US5 UNK-ID MH1	Handhole	Ridgecrest	35.643883, -117.672119
108	CHLKCAXF 1282	Handhole	Ridgecrest	35.643808, -117.672300
109	CHLKCAXF 200	Handhole	Ridgecrest	35.643808, -117.672300
110	Handhole adjacent to CHLKCAXF 200	Handhole	Ridgecrest	35.643283, -117.671989
111	CHLKCAXF 1256	Handhole	Ridgecrest	35.642764, -117.672153
112	CHLKCAXF 1261	Handhole	Ridgecrest	35.644278, -117.676311
113	H4009	Fiber Hub	Ridgecrest	35.644397, -117.676597
114	B-Box1100	B-Box, Cross Connect	Ridgecrest	35.644397, -117.676597
115	Repeater adjacent to B- Box 1100	Repeater	Ridgecrest	35.663197, -118.306111

#### **IV. Field Inspection – Violations List**

My staff observed the following violations during the 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 notify the responsible third-party of the following safety hazards:

- Pole 1649839E: a third-party communications ground wire was hanging around the base of the pole.
- Pole 4419173E: a third-party communications lashing wire was broken and contacting a Frontier conductor
- Pole 4646: a third-party communications down guy wire was loose, causing it to contact a Frontier down guy wire
- Pole 4390705E: a third-party riser conduit had missing sections that exposed the vertical supply conductor (which was also cut) at approximately 10 feet from ground level
- Pole 4177842E: a third-party communications conductor was hanging around the pole at the public level
- Pole 1900079E: a third-party down guy anchor was abandoned near the pole
- Pole 4867174E: a third-party supply conductor was contacting a third-party span guy wire

#### **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 the following poles were not maintained for their intended use:

- Pole 730873E: a Frontier conductor was supported by a third-party communications conductor via a zip-tie.
- Pole 818117E: Frontier had a damaged lashing wire.
- Pole 1799218E: Frontier had a damaged lashing wire.
- Pole 1761278E: the Frontier splice box on the conductor was partially open, exposing the conductor.
- Pole 1737260E: (1) Frontier had damaged riser straps; (2) there was a hanging Frontier splice box not supported by either the pole or the conductor.
- Pole 4453176E: Frontier's facilities on the buddy pole need to be transferred to the new pole.

- Pole 1778679E: Frontier's facilities on the buddy pole need to be transferred to the new pole.
- Pole 4860379E: (1) Frontier's facilities on the buddy pole need to be transferred to the new pole; (2) Frontier's splice box was contacting an alley arm brace; (3) a third-party communication conductor was zip-tied to Frontier's splice box.
- Pole 1615834E: Frontier's facilities on the buddy pole need to be transferred to the new pole
- Pole 4241378E: a Frontier vertical conductor was cut at the base of the pole.
- Pole 1649839E: Frontier's facilities on the buddy pole need to be transferred to the new pole.
- Pole 2025374E: (1) Frontier's facilities on the buddy pole need to be transferred to the new pole; (2) Frontier had a damaged lashing wire.
- Pole 25480-CIT: the communications only pole had a splitting pole top

**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 the following poles was permanently abandoned and not removed:

- Pole 1761281E: a disconnected Frontier service drop was wrapped around the pole and hanging at the public level
- Pole 2331801E: a disconnected Frontier service drop was entangled in nearby tree branches and hanging at the public level
- Pole 4867174E: multiple Frontier service drops were cut and hanging from the conductor to the ground

**GO 95, Rule 34, Foreign Attachments,** states in part:

*Nothing in these rules shall be construed 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.*

A Frontier pole, 1 Pole West of 10440, had a customer metal wire fence tied around its base.



**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.

A Frontier communications conductor supported on the following poles had less than 12 inches of vertical clearance from a third-party communications conductor supported on the same pole:

- Pole 4921530E: a Frontier communications conductor was contacting a third-party communications conductor.
- Pole 2025374E: a Frontier communications conductor was contacting a third-party communications conductor.
- Pole 5806693E: a Frontier communications conductor was contacting multiple third-party communications service drops at the pole and at midspan

**GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19** requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be three inches.

A Frontier down guy wire supporting the following poles had less than 3 inches of radial clearance from a Frontier communications conductor supported on the same pole:

- Pole 46470

A third-party down guy wire supporting the following poles had less than 3 inches of radial clearance from a Frontier communications conductor supported on the same pole:

- Pole 4739171E
- Pole 1702289E

**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).*

A Frontier communications conductor was contacting Pole 1615834E to which it was not attached.

**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 molding attached to the buddy pole adjacent to Pole 4453176E was damaged.

**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 the following poles were obstructed:

- Pole 5806692E: the climbing space was obstructed by communication conductors in all quadrants of the pole.
- One pole east of Pole 4826831E: the climbing space was obstructed by vegetation.

**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.*

The following Frontier communications service drops had less than the minimum required above ground clearance:

- Pole 4177841E: multiple Frontier communications service drops servicing nearby homes had an above ground clearance of less than 8 feet, 6 inches. The Frontier splice box was on the ground near the base of the pole and multiple service drops were on the ground along a nearby fence.
- Pole 4739170E: a Frontier communications service drop servicing a nearby home had an above ground clearance of less than 8 feet, 6 inches. The service drop was found lying on the ground along nearby fence.

**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 attached to the following poles was not taut:

- 22238-CIT
- 22258-CIT: the Frontier down guy wire was loose and touching another down guy wire

**GO 95, Rule 86.9, Guy Marker,** 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.*

The guy marker on the following poles was missing:

- Pole 4241378E: the Frontier sidewalk guy supporting the pole was missing a guy marker.
- Pole 22238-CIT: the Frontier sidewalk guy was missing a guy marker.

**GO 95, Rule 87.7-D1(b), Risers, 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 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 on the following poles had a missing section at the base of the pole:

- Pole 1737260E
- Pole 4241378E

**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 facilities required maintenance:

- The pedestal adjacent to Pole 1744287E had an unsecured cover and was left open.
- The Frontier manhole, CHLKAXF42, had an unsecured lid with missing bolts.

- The Frontier manhole, CHLKCAXF69, had an unsecured lid with missing bolts.
- The Frontier handhole, CHLKCAXF C54686 US5 UNK-ID MH1, had an unsecured cover which could not be completely closed.
- The Frontier handhole, CHLKCAXF 200, had an unsecured cover with missing bolts.
- The Frontier handhole, CHLKCAXF 1256, had an unsecured cover with missing bolts.
- The Frontier handhole, CHLKCAXF 1261, had an unsecured cover with missing bolts.
- The Frontier repeater, Repeater adjacent to B-Box 1100, had a missing bolt on the locking clamp.