PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

June 7, 2026 CA2026-1347

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

Subject: Audit of Frontier's Yucca Valley District

Ms. Geise:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller of my staff conducted a communications infrastructure provider audit of Frontier's Yucca Valley District from April 6-10, 2026. The audit included a review of Frontier's records and field inspections of Frontier's 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 8, 2026, 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 James Miller at (213) 660-8898 or James.Miller@cpuc.ca.gov.

Sincerely,

Majed Ibrahim, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: Audit Findings

Cc: Leslie Palmer, Deputy Executive Director for Safety Enforcement, Safety Policy and Water, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Saimon Islam, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Inspection records
- Work order and notification records
- Third party notifications
- Pole loading calculation records
- Inspection and maintenance procedures

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.*

Frontier's records indicated that during the twelve months prior to the audit, Frontier completed 23 work orders past Frontier's due date for corrective action. Additionally, as of the audit, Frontier had 33 open work orders that were past Frontier's scheduled due date for corrective action.

GO 95, Rule 80.1-A4, Record Keeping, states:

> *Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a).*

Frontier's work order records showed that work order No. T-00326676 had been completed on November 10, 2025 for a pole located at 34.1389193 ºN, 116.4154287 ºW. The work order record indicated that it had been generated because of a clearance or separation issue. My staff went to this location and found that Pole No. 1555856E matched Frontier's coordinates for this work order but also

observed that Frontier's facilities were still in contact with a third-party communications conductor at this pole.

III. Field Inspections

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

No.	Facility ID No.	Facility Type	City	Coordinates
1	40392S	Utility Pole	29 Palms	34.12087 ºN , 116.03461 ºW
2	243232S	Utility Pole	29 Palms	34.12082 ºN , 116.03526 ºW
3	1779332E	Utility Pole	29 Palms	34.12083 ºN , 116.03578 ºW
4	8519CWT	Utility Pole	29 Palms	34.12075 ºN , 116.03579 ºW
5	2233011E	Utility Pole	29 Palms	34.12083 ºN , 116.03620 ºW
6	22815CWT	Utility Pole	29 Palms	34.12047 ºN , 116.03578 ºW
7	40350	Utility Pole	29 Palms	34.12023 ºN , 116.03577 ºW
8	22816CWT	Utility Pole	29 Palms	34.11987 ºN , 116.03574 ºW
9	40351	Utility Pole	29 Palms	34.11952 ºN , 116.03575 ºW
10	40409S	Utility Pole	29 Palms	34.11918 ºN , 116.03574 ºW
11	40352	Utility Pole	29 Palms	34.11891 ºN , 116.03574 ºW
12	22817CWT	Utility Pole	29 Palms	34.11864 ºN , 116.03574 ºW
13	40393S	Utility Pole	29 Palms	34.12086 ºN , 116.03407 ºW
14	4938649E	Utility Pole	29 Palms	34.12086 ºN , 116.03284 ºW
15	5000380E	Utility Pole	29 Palms	34.12086 ºN , 116.03284 ºW
16	41936	Utility Pole	29 Palms	34.14427 ºN , 116.08510 ºW
17	4999957E	Utility Pole	29 Palms	34.14426 ºN , 116.08573 ºW
18	4035342E	Utility Pole	29 Palms	34.14428 ºN , 116.08467 ºW
19	32567CWT	Utility Pole	29 Palms	34.14519 ºN , 116.08510 ºW
20	4712293E	Utility Pole	29 Palms	34.14519 ºN , 116.08542 ºW
21	No ID Tag	Handhole	29 Palms	34.14519 ºN , 116.08542 ºW
22	4036700E	Utility Pole	29 Palms	34.14518 ºN , 116.08606 ºW
23	20834CWT	Utility Pole	29 Palms	34.14516 ºN , 116.08662 ºW
24	43321	Utility Pole	29 Palms	34.14521 ºN , 116.08458 ºW
25	47950CWT	Utility Pole	29 Palms	34.14608 ºN , 116.08491 ºW
26	43325	Utility Pole	29 Palms	34.14606 ºN , 116.08541 ºW
27	4851013E	Utility Pole	29 Palms	34.14607 ºN , 116.08590 ºW
28	No ID Tag	Pull Box	Joshua Tree	34.13920 ºN , 116.21216 ºW
29	4850514E	Utility Pole	Joshua Tree	34.14049 ºN , 116.31308 ºW
30	41383	Utility Pole	Joshua Tree	34.14089 ºN , 116.31309 ºW
31	4961531E	Utility Pole	Joshua Tree	34.14116 ºN , 116.31308 ºW
32	4036394E	Utility Pole	Joshua Tree	34.14155 ºN , 116.31309 ºW
33	41385	Utility Pole	Joshua Tree	34.14157 ºN , 116.31264 ºW
34	27354CWT	Utility Pole	Joshua Tree	34.14156 ºN , 116.31214 ºW

35	2231203E	Utility Pole	Joshua Tree	34.14156	ºN	,	116.31165	ºW
36	41387S	Utility Pole	Joshua Tree	34.14157	ºN	,	116.31118	ºW
37	GT119334	Utility Pole	Joshua Tree	34.14150	ºN	,	116.31093	ºW
38	No ID Tag	Utility Pole	Joshua Tree	34.14202	ºN	,	116.31092	ºW
39	No ID Tag	Utility Pole	Joshua Tree	34.14229	ºN	,	116.31092	ºW
40	41388	Utility Pole	Joshua Tree	34.14138	ºN	,	116.31321	ºW
41	30189CWT	Utility Pole	Joshua Tree	34.14103	ºN	,	116.31361	ºW
42	41891S	Utility Pole	Joshua Tree	34.14069	ºN	,	116.31404	ºW
43	1607038	Utility Pole	Joshua Tree	34.14059	ºN	,	116.31392	ºW
44	2292429E	Utility Pole	Joshua Tree	34.16866	ºN	,	116.31292	ºW
45	2292430E	Utility Pole	Joshua Tree	34.16924	ºN	,	116.31293	ºW
46	2292431E	Utility Pole	Joshua Tree	34.16980	ºN	,	116.31293	ºW
47	No ID Tag	Utility Pole	Joshua Tree	34.17039	ºN	,	116.31293	ºW
48	2292433E	Utility Pole	Joshua Tree	34.17095	ºN	,	116.31292	ºW
49	T-2793	Pedestal	Joshua Tree	34.16894	ºN	,	116.31292	ºW
50	1607120E	Utility Pole	Joshua Tree	34.16792	ºN	,	116.31292	ºW
51	No ID Tag	Handhole	Joshua Tree	34.14851	ºN	,	116.30742	ºW
52	No ID Tag	Handhole	Joshua Tree	34.14849	ºN	,	116.30815	ºW
53	No ID Tag	Handhole	Joshua Tree	34.14833	ºN	,	116.30805	ºW
54	No ID Tag	Handhole	Joshua Tree	34.14834	ºN	,	116.30708	ºW
55	No ID Tag	Handhole	Joshua Tree	34.14850	ºN	,	116.30703	ºW
56	No ID Tag	Handhole	Joshua Tree	34.14836	ºN	,	116.30659	ºW
57	No ID Tag	Handhole	Joshua Tree	34.14850	ºN	,	116.30627	ºW
58	No ID Tag	Handhole	Joshua Tree	34.14836	ºN	,	116.30574	ºW
59	No ID Tag	Handhole	Joshua Tree	34.14854	ºN	,	116.30552	ºW
60	No ID Tag	Handhole	Joshua Tree	34.14837	ºN	,	116.30504	ºW
61	No ID Tag	Handhole	Joshua Tree	34.14852	ºN	,	116.30476	ºW
62	No ID Tag	Handhole	Joshua Tree	34.14852	ºN	,	116.30476	ºW
63	No ID Tag	Handhole	Joshua Tree	34.14852	ºN	,	116.30382	ºW
64	342129	Utility Pole	Joshua Tree	34.11889	ºN	,	116.34428	ºW
65	341826	Utility Pole	Joshua Tree	34.11990	ºN	,	116.34424	ºW
66	No ID Tag	Pedestal	Joshua Tree	34.11989	ºN	,	116.34427	ºW
67	No ID Tag	Utility Pole	Joshua Tree	34.11993	ºN	,	116.34412	ºW
68	GT112771	Stub Pole w/Repeater	Joshua Tree	34.11991	ºN	,	116.34395	ºW
69	No ID Tag	Utility Pole	Joshua Tree	34.12036	ºN	,	116.34410	ºW
70	4967129E	Utility Pole	Pioneertown	34.15341	ºN	,	116.49383	ºW
71	4967128E	Utility Pole	Pioneertown	34.15309	ºN	,	116.49375	ºW
72	4667877E	Utility Pole	Pioneertown	34.15205	ºN	,	116.49389	ºW
73	4037551E	Utility Pole	Pioneertown	34.15108	ºN	,	116.49379	ºW
74	4742671E	Utility Pole	Pioneertown	34.15386	ºN	,	116.49384	ºW
75	4036565E	Utility Pole	Pioneertown	34.15476	ºN	,	116.49383	ºW

76	No ID Tag	Utility Pole	Pioneertown	34.15531	ºN	,	116.49384	ºW
77	4967131E	Utility Pole	Pioneertown	34.15597	ºN	,	116.49345	ºW
78	1742841E	Utility Pole	Rimrock	34.20414	ºN	,	116.49378	ºW
79	No ID Tag	Pedestal	Rimrock	34.20414	ºN	,	116.49378	ºW
80	1742483E	Utility Pole	Rimrock	34.20511	ºN	,	116.49507	ºW
81	1742484E	Utility Pole	Rimrock	34.20511	ºN	,	116.49507	ºW
82	1742485E	Utility Pole	Rimrock	34.20616	ºN	,	116.49507	ºW
83	1742486E	Utility Pole	Rimrock	34.20616	ºN	,	116.49507	ºW
84	1742488E	Utility Pole	Rimrock	34.20616	ºN	,	116.49507	ºW
85	1741334E	Utility Pole	Rimrock	34.20616	ºN	,	116.49507	ºW
86	GT11663	Utility Pole	Rimrock	34.20616	ºN	,	116.49746	ºW
87	No ID Tag	Utility Pole	Yucca Valley	34.18587	ºN	,	116.39483	ºW
88	2107730E	Utility Pole	Yucca Valley	34.18602	ºN	,	116.39475	ºW
89	2107731E	Utility Pole	Yucca Valley	34.18657	ºN	,	116.39450	ºW
90	2107732E	Utility Pole	Yucca Valley	34.18708	ºN	,	116.39426	ºW
91	2107737E	Utility Pole	Yucca Valley	34.18637	ºN	,	116.39388	ºW
92	2107738E	Utility Pole	Yucca Valley	34.18630	ºN	,	116.39373	ºW
93	2107484E	Utility Pole	Yucca Valley	34.10852	ºN	,	116.44362	ºW
94	T-3046	Pedestal	Yucca Valley	34.10835	ºN	,	116.44359	ºW
95	4967487E	Utility Pole	Yucca Valley	34.10795	ºN	,	116.44359	ºW
96	4967488E	Utility Pole	Yucca Valley	34.10752	ºN	,	116.44361	ºW
97	No ID Tag	Pedestal	Yucca Valley	34.10752	ºN	,	116.44361	ºW
98	2311838E	Utility Pole	Yucca Valley	34.10660	ºN	,	116.44361	ºW
99	P-3049	Pedestal	Yucca Valley	34.10661	ºN	,	116.44359	ºW
100	4573628E	Utility Pole	Yucca Valley	34.10579	ºN	,	116.44357	ºW
101	T-3702	Pedestal	Yucca Valley	34.10577	ºN	,	116.44366	ºW
102	4766357E	Utility Pole	Yucca Valley	34.10577	ºN	,	116.44310	ºW
103	4812586E	Utility Pole	Yucca Valley	34.10577	ºN	,	116.44260	ºW
104	T-1456	Pedestal	Yucca Valley	34.10578	ºN	,	116.44259	ºW
105	No ID Tag	Handhole	Yucca Valley	34.10851	ºN	,	116.43989	ºW
106	T1757718	Handhole	Yucca Valley	34.10880	ºN	,	116.43978	ºW
107	T1757721	Handhole	Yucca Valley	34.10943	ºN	,	116.43942	ºW
108	No ID Tag	Handhole	Yucca Valley	34.10944	ºN	,	116.43878	ºW
109	T1757722	Handhole	Yucca Valley	34.10943	ºN	,	116.43811	ºW
110	No ID Tag	Handhole	Yucca Valley	34.10944	ºN	,	116.43746	ºW
111	T1757724	Handhole	Yucca Valley	34.10946	ºN	,	116.43681	ºW
112	No ID Tag	Handhole	Yucca Valley	34.10946	ºN	,	116.43681	ºW
113	40412	Utility Pole	29 Palms	34.16095	ºN	,	116.03214	ºW
114	40667	Utility Pole	29 Palms	34.15541	ºN	,	116.05328	ºW
115	40034	Utility Pole	29 Palms	34.13278	ºN	,	116.08309	ºW
116	1802397E	Utility Pole	29 Palms	34.18103	ºN	,	116.42266	ºW

117	1555856E	Utility Pole	29 Palms	34.13932 ºN , 116.41772 ºW
118	4967417E	Utility Pole	29 Palms	34.13891 ºN , 116.41542 ºW
119	6495	Utility Pole	29 Palms	34.10655 ºN , 116.41440 ºW
120	4537845E	Utility Pole	Yucca Valley	34.11182 ºN , 116.47552 ºW
121	4328391E	Utility Pole	Yucca Valley	34.11451 ºN , 116.46796 ºW
122	4328393E	Utility Pole	Yucca Valley	34.11458 ºN , 116.46676 ºW

IV. Field Inspection – Violations List

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.*

My staff observed broken lashing wire near Pole No. 4999957E and Pole No. 4850514E.

My staff observed that two aerial terminals were missing their covers near Pole No. 4036565E.

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.*

My staff found that the following Frontier facilities had been abandoned without having been removed:

- Two cut and dangling service drops attached to Pole No. 1779332E
- A service drop, cut and in contact with the ground, attached to Pole No. 2231203E
- A service drop, cut and in contact with the ground, attached to Pole No. 41891S
- A service drop attached to Pole No. 6495
- Multiple service drops midspan just east of Pole No. 4999957E

GO 95, Rule 92.4-D1 – Exposed Cables and Messengers states in part:

> *The exposed communications conductors and messengers shall be grounded: At all deadend poles and at intervals not greater than every one–quarter of a mile (1320 feet).*

My staff observed that Frontier communications conductors and messengers were not grounded at the following dead-end poles:

- 1607038E
- 2292433E
- 4967131E
- 1742841E
- 1742486E
- 2311838E
- GT119334

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)," and "Communication Conductors and Supply Drops" supported on the same pole to be 12 inches.

My staff observed that Frontier communications conductors were in contact with third-party communications conductors on or near each of the following poles:

- 40392S
- 243232S
- 22815CWT
- 40351
- 5000380E
- 4999957E
- 32567CWT
- 4712293E
- 4036700E
- 20834CWT
- 43321
- 47950CWT
- 4851013E
- 4961531E
- 4036394E
- 41385
- 27354CWT
- 2231203E
- 41387S
- GT119334
- 30189CWT
- 2292429E
- 2292430E
- 2292431E
- The tagless pole north of 2292431E
- 2292433E
- 1607120E
- 341826
- 2107730E
- 2107731E
- 2107732E
- 2107738E
- 4967487E
- 4967488E
- 4573628E
- 6495
- 1555856E

GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment.*

My staff observed that Pedestal No. T2793 was damaged and appeared to have been knocked over.

My staff also observed that Pedestal No. T1456 was partially buried in the soil.

GO 128, Rule 42.7, Covers, states in part:

> *Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal.*

My staff found that none of the handholes inspected required a tool or appliance for the removal of their covers; all twenty-two could be opened by hand.

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 communications conductors supported on the same pole to be three inches.

My staff observed that Frontier conductors were in contact with third-party down guy wires on or near the following poles:

- 4967129E
- 4967131E
- 2311838E

GO 95, Rule 91.3, Stepping, Section B., Location of Steps, states in part:

> *The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

My staff observed that the lowest pole step on each of the following poles was located at a height of less than 8 feet:

- 41383
- 40034

GO 95, Rule 84.4-A3, Clearances Above Ground [in areas] Accessible to Pedestrians Only, states:

> *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*

My staff observed six instances of Frontier conductors in areas accessible to pedestrians only with less than eight feet of ground clearance:

- A Frontier hardline conductor at a height of 6.5 feet near Pole No. 2233011E.
- A Frontier service drop at a height of 5 feet near Pole No. 4667877E.
- A Frontier service drop in contact with the ground near Pole No. 4037551E.
- A Frontier service drop at a height of 6 feet near Pole No. 1741334E.
- A Frontier service drop in contact with the ground near Pole No. 40667.
- A Frontier service drop at a height of 5 feet near Pole No. 6495.

87.7 Covering or Guarding D. Risers (1) 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:

(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.

My staff observed that a hardline riser supported on Pole No. 4938649E was not securely attached to the surface of the pole and lacked a protective conduit or covering.

My staff also observed that a fiber optic riser supported on Pole No. 342129 was not securely attached to the surface of the pole and lacked a protective conduit or covering.

My staff found that multiple service drops on Pole No. 2107732E were not secured to the pole or protected by a conduit or molding.