STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

November 9, 2026 CA2026-1462

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

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Frontier San Jose/Gilroy/Oro Loma

Ms. Smith:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Nora Nguyen of ESRB staff conducted a CIP audit of Frontier's San Jose/Gilroy/Oro Loma region facilities from July 13-17, 2026. During the audit, ESRB staff conducted field inspections of Frontier's communication 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 and observations is enclosed. Please provide a response no later than December 11, 2026, 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 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 Nora Nguyen at nora.nguyen@cpuc.ca.gov or (625) 255-0111.

Sincerely,



STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

Enclosure: CPUC Communication Audit Report for Frontier San Jose /Gilroy/ Oro Loma

CC: Koko Tomassian, Director, Safety and Enforcement Division (SED), CPUC
Chihsien "Eric" Wu, Program Manager, ESRB, SED, CPUC
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FRONTIER SAN JOSE /GILROY/ ORO LOMA

COMMUNICATIONS AUDIT FINDINGS

July 13-17, 2026

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Frontier's San Jose /Gilroy/ Oro Loma areas:

- Frontier's Facilities Statistics of the San Jose /Gilroy/ Oro Loma region, including miles of overhead lines, miles of underground cable, number of poles, number of underground structures, and number of customers
- Map of wired, overhead, and underground facilities
- Frontier Confidential Inspection Maintenance Procedures for 2020-2026
- Inspection records for overhead facilities conducted June 2021 through June 2026
- List of all open/ completed tickets created from June 2021 through June 2026
- Safety factor and pole loading calculations from June 2021 through June 2026
- Intrusive pole tests conducted from June 2021 through June 2026
- New construction projects completed from June 2024 through June 2026

II. Record Violations

1. **General Order (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.*

  EXCEPTION – Potential violations specified in Appendix J or subsequently approved through Commission processes, including, but not limited to, a Tier 2 Advice Letter under GO 96B, that can be completed at a future time as opportunity-based maintenance."

Frontier California's Outside Plant Maintenance, Inspection, and Repair Programs, updated in May 2026, defines the following priority levels:

"Priority Level 1, 2 or 3. Priority Level 1 issues are those that create an 'immediate safety and/or reliability risk with high probability for significant impact.' For these issues, GO 95 requires companies to 'take action immediately (within 24 hours), either by fully repairing the condition, or by temporarily repairing and reclassifying the condition to a lower priority.'

Priority Level 2 conditions pose 'variable (non-immediate high to low) safety and/or reliability risk.' Corrective action for these conditions must be taken (a) within 6 months for nonconformances that 'compromise worker safety' or 'create a fire risk' and are located in an Extreme High Fire Threat Zone (Tier 3), (b) within 12 months in a Very High Fire Threat Zone (Tier 2) and (c) within 36 months for all other Level 2

nonconformances. These deadlines run from the date the nonconformance is first identified.

Priority Level 3 items are an 'acceptable safety and/or reliability risk' and action should be taken 'as appropriate' within 60 months.

Additionally, Frontier established an internal Level 4 priority for issues that pose minimal safety risks beyond Level 3, as defined under GO 95, Rule 18. Level 4 designates opportunity maintenance during construction activity at the same pole. Corrective action is set to a default date of 1/1/2050."

a. ESRB's review of Frontier's work order records from June 2021 through June 2026 found 750 out of 2397 (31.3%) were overdue. The table does not include the 3 tickets that had a "Normal" priority or unassigned priority levels. Table 1 summarizes the late pending and late closed work orders by assigned priority level.

Table 1: Late Tickets

Priority Level	Late Pending Tickets	Late Closed Tickets	Total Late Tickets
1	1	1	**2**
2	138	9	**147**
2A	78	23	**101**
2B	169	186	**355**
2C	106	34	**140**
3	3	2	**5**
Total	**495**	**255**	**750**

Frontier must provide ESRB with a corrective action plan that addresses completion of the overdue open work orders, and implementation of preventive measures to ensure that Frontier completes future tickets within the required timeframes.

b. ESRB found 143 tickets that did not have an assigned priority level. All 143 tickets were created between June 2023 to December 2023 and assigned a due date of December 31, 2049, exceeding any time frames defined by Frontier's priority levels in its 2023 Inspection Maintenance Procedures. Frontier should ensure that all tickets are assigned a hazard level or priority classification when created and that the associated due dates are consistent with the corrective action timelines required by GO 95, Rule 18-B.

ESRB notes that Frontier introduced Level 4 priority in the August 2025 revision of "Frontier California's Outside Plant Maintenance, Inspection, and Repair Programs" for issues that pose minimal safety risks less than Level 3, as defined under GO 95, Rule 18. Level 4 tickets are defined as "opportunity maintenance" and has a default due date of 1/1/2050 in Frontier's ticket tracking system. Frontier has integrated Level 4 priorities into its records to reflect the change in its maintenance and inspection program.

2. GO 128, Rule 17.2 Inspection states:

"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"

a. ESRB reviewed Frontier's patrol and inspection records from June 2021 through June 2026. Frontier did not provide any underground inspection records for the specified period.

b. Frontier's Inspection Maintenance Program states that "Frontier California has regular Manhole T-Zone inspections" but does not define the inspection intervals. The program also does not specify inspection intervals for other underground or pad-mount assets. Frontier must update its program and maintain records of its inspections to comply with the requirements of GO 128, Rule 17.2.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Asset Type	Asset Number	Latitude	Longitude
1	Pole	N/A	-121.6612258	37.11711668
2	Pole	N/A	-121.6615654	37.11389434
3	Pole	N/A	-121.6615497	37.105031
4	Vault	N/A	-121.661832	37.10495733
5	Connection Box	N/A	-121.661524	37.10502868
6	Pole	GT55192	-121.6607712	37.10522133
7	Vault	N/A	-121.626703	37.14432819
8	Vault	N/A	-121.6253319	37.14546213
9	Pole	GT 56626	-121.6767313	37.13252508
10	Pole	GT 32232	-121.6768231	37.13263282
11	Pole	GT 56627	-121.6760458	37.13303394
12	Pole	121576799	-121.6754287	37.13343444
13	Pole	121643214	-121.6753429	37.13351107
14	Pole	121576798	-121.6746224	37.13399529
15	Pole	121576668	-121.6940773	37.11851598
16	Pole	GT 53732	-121.6937872	37.11802449
17	Pole	N/A	-121.6934684	37.11740177
18	Pole	N/A	-121.6933132	37.1170166
19	Pole	GT 53790	-121.6927254	37.11675051
20	Pole	1218565446	-121.6847498	37.11011436
21	Pole	120017036	-121.6843201	37.11026037
22	Pole	121812138	-121.6835562	37.11057937
23	Pole	GTE 1221595	-121.6054239	37.05113297
24	Pole	121959199	-121.6040497	37.05101907
25	Pole	121578250	-121.6037689	37.05051611
26	Pole	121578248	-121.6034481	37.04987751
27	Pole	121578249	-121.6031382	37.04924153
28	Pole	CTC 12514	-121.7080936	37.01151874
29	Pole	120821534	-121.7089928	37.0121544
30	Pole	120187087	-121.7090362	37.012213
31	Pole	CTC 12517	-121.7097725	37.01306521
32	Pole	110533428	-121.7097022	37.01312444
33	Pole	CTC 1211640	-121.5813573	37.01596231
34	Pole	CTC 1211519	-121.5813288	37.01595239
35	Pole	CTC 1211641	-121.5817327	37.01584905
36	Pole	CTC 1211608	-121.5817471	37.01583144
37	Pole	CTC 1221594	-121.5821005	37.01574285
38	Pole	CTC1211610	-121.5820784	37.01572126
39	Connection Box	N/A	-121.5871609	37.01127192
40	Connection Box	N/A	-121.587128	37.01132815
41	Vault	N/A	-121.587105	37.01151528
42	Vault	N/A	-121.5868541	37.01211173

43	Vault	N/A	-121.5916091	37.02113014
44	Connection Box	N/A	-121.5916348	37.02096117
45	Vault	N/A	-121.5916219	37.02095985
46	Vault	N/A	-121.5916227	37.02054681
47	Connection Box	N/A	-121.5977011	37.00132296
48	Vault	N/A	-121.597736	37.00120158
49	Vault	N/A	-121.5982333	37.00109476
50	Vault	N/A	-121.5982442	37.00079038
51	Vault	N/A	-121.5979403	37.00050642
52	Vault	N/A	-121.5976712	37.00063875
53	Pole	121427569	-121.5689212	37.00265275
54	Pole	121427570	-121.5689397	37.00275476
55	Pole	120148753	-121.5688408	37.00260803
56	Pole	CTC 1025925	-121.5687948	37.00249836
57	Pole	120148751	-121.5686912	37.00225507
58	Pole	121643431	-121.5335353	37.02323994
59	Pole	CTC 1025460	-121.533064	37.02358745
60	Pole	121643424	-121.5323743	37.02406224
61	Pole	121584103	-121.5435787	36.98584992
62	Pole	121583983	-121.543066	36.98601663
63	Pole	121584024	-121.5443118	36.98566253
64	Pole	CTC 1026392	-121.5445697	36.98555746
65	Pole	110413385	-121.5181775	37.00752368
66	Pole	CTC 12520	-121.5181552	37.00753256
67	Pole	CTC 1021124	-121.4437233	36.9863051
68	Pedestal	N/A	-120.5771156	36.82175158
69	Pole	CTC 1035490	-120.6546731	36.91245127
70	Pole	CTC 1125149	-120.6544215	36.91247119
71	Pole	120130087	-120.6266635	36.96812903
72	Pole	120130201	-120.6266062	36.9672702
73	Pole	121795711	-120.6264486	36.96729789
74	Pedestal	N/A	-120.6265924	36.96726868
75	Pedestal	N/A	-120.6266554	36.96761274
76	Pedestal	N/A	-120.6354542	36.98054086
77	Pedestal	N/A	-120.6354116	36.98091858
78	Pedestal	N/A	-120.6354456	36.97996868
79	Pedestal	N/A	-120.6357474	36.97998929
80	Connection Box	N/A	-120.6357501	36.97999374
81	Pole	CTC 1123811	-120.629163	36.98560057
82	Pole	N/A	-120.6291982	36.98612659
83	Pole	CTC 1122676	-120.6304152	36.98638716
84	Pole	CTC 1122618	-120.6301137	36.98640918
85	Pole	120383029	-120.6297508	36.98913401
86	Pole	110201239	-120.6303248	36.98915661
87	Pole	120383026	-120.6309476	36.98915033
88	Pole	120383027	-120.6309036	36.98914472

89	Pole	120383041	-120.6271838	36.9900226
90	Pole	N/A	-120.6270325	36.989706
91	Pole	120383003	-120.6270752	36.98912507
92	Pole	N/A	-120.6362937	37.02541854
93	Pole	CTC 112____9 (unable to see)	-120.6359845	37.02542432
94	Pole	121244526	-120.63596	37.02527517
95	Pole	FTR 702316	-120.6896721	37.05471397
96	Connection Box	N/A	-120.6896898	37.05471954
97	Pedestal	N/A	-120.6901011	37.05470238
98	Pole	CTC 1124628	-120.689808	37.05493474
99	Pole	CTC 1124639	-120.6898047	37.05581869
100	Pole	GT 214286	-121.9825688	37.2289922
101	Vault	N/A	-121.9825927	37.22899365
102	Pole	GT 134269	-121.9830358	37.22926443
103	Pole	GT 49743	-121.9834656	37.22954482
104	Pole	121810395	-121.9838109	37.2296975
105	Pole	CT 27349	-121.9838387	37.22686602
106	Pole	GT 27348	-121.9836834	37.22714341
107	Pole	GT 27358	-121.9835093	37.22673796
108	Pole	121165795	-121.9831932	37.2265835
109	Pole	121461028	-121.984936	37.22295383
110	Pole	122177898	-121.9853369	37.22315684
111	Pole	GT 27329	-121.9856378	37.2232475
112	Pole	122177909	-121.9846254	37.2228045
113	Pole	GT 98301	-121.9877509	37.20057694
114	Pole	N/A	-121.988086	37.20164273
115	Pole	GT 55992	-121.9888853	37.20179544
116	Pole	12091702	-121.9871591	37.20029151
117	Pole	122340580	-122.0184352	37.19316753
118	Pole	121345991	-122.0176054	37.19311019
119	Pole	GT 55108	-122.0168556	37.1929713
120	Pole	GT 260661	-122.0166983	37.19291259
121	Pole	GT 207558	-121.9730339	37.25112611
122	Pole	GT 216381	-121.9732266	37.25140969
123	Pole	GT 252789	-121.9733786	37.2521411
124	Pole	N/A	-121.9732461	37.25168187
125	Pole	121797874	-121.9520413	37.25594787
126	Pole	GT 205672	-121.9514861	37.25569301
127	Pole	121763442	-121.951254	37.25560362
128	Pole	121764089	-121.9510772	37.23956332
129	Pole	1214304981	-121.9511661	37.23999809
130	Pole	GT 19770	-121.9509496	37.23898655
131	Pole	121764088	-121.9507869	37.23856947
132	Pole	120110934	-121.9371018	37.23918799
133	Connection Box	1008	-121.9362893	37.23914962
134	Pole	GT 30311	-121.9362539	37.2391668

135	Pole	N/A	-121.9162308	37.23745366
136	Pole	30405	-121.9167133	37.23799118
137	Pole	GT 302403	-121.6626404	37.08893941
138	Pole	GT 302537	-121.6633214	37.0889113
139	Vault	N/A	-121.66334	37.08890749
140	Pole	GT 141459	-121.6619394	37.08928621
141	Pole	121581696	-121.6611335	37.08963647
142	Pole	GT 33872	-121.6620569	37.07318465
143	Pole	GT 33875	-121.6621882	37.07328778
144	Pole	121112898	-121.6617772	37.07397546
145	Pole	GT 140607	-121.6614946	37.07469712
146	Pole	GT 33679	-121.6234734	37.11001922
147	Pole	121455003	-121.6235672	37.11011481
148	Pole	N/A	-121.6229303	37.11020437
149	Pole	GT 118781	-121.6223487	37.11042998
150	Pole	GT 33686	-121.6221287	37.11045777

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 2:

Table 2: GO 95, Rule 31.1 Findings

Location	Finding
9	Broken ground wire.
12	Buddy pole. Frontier needs to transfer their facilities.
18	Buddy pole. Frontier needs to transfer their facilities.
19	Buddy pole. Frontier needs to transfer their facilities.
22	Buddy pole. Frontier needs to transfer their facilities.
69	Ground wire detached from pole.
85	Buddy pole. Frontier needs to transfer their facilities.
90	Pole leaning.
92	Damaged / deteriorating pole
105	Buddy pole. Frontier needs to transfer their facilities.
108	Buddy pole. Frontier needs to transfer their facilities.
109	Improper installation of Frontier lines.
134	Buddy pole. Frontier needs to transfer their facilities.

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	Finding
15[1]	Abandoned facilities.
17[1]	Abandoned facilities.
18[1]	Abandoned facilities.
20	Abandoned facilities.
60	Abandoned service drop.
69	Abandoned service drop.
91	Abandoned service drop.
94	Abandoned service drops.
106	Abandoned service drops.
122	Abandoned unknown wire; potentially a guy wire.

3. **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 evidence of 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)."

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

Table 4: GO 95, Rule 35 Findings

Location	Finding
84	Overgrown vegetation causing strain on conductor and drops.
124	Overgrown vegetation causing strain and abrasion.

4. **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. 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."

ESRB's finding related to the above rule is listed in Table 5:

Table 5: GO 95, Rule 84.6-B Finding

Location	Finding

[1] Frontier field staff explained that the areas are a "hotspot" for copper theft. Repeated instances of theft have hindered the maintenance of the copper system in these areas.

59	Exposed ground wire.

5. **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 6:

Table 6: GO 95, Rule 86.2 Findings

Location	Finding
54	Slack down guy.
88	Broken/ slack down guy.
140	Slack down guy.

6. **GO 95, Rule 87.4-H Clearances From Grounded Metal Boxes, Hardware and Equipment Associated with Supply Lines states in part:**

   "Cables and messengers installed on non–metallic poles or non–metallic structures shall have a minimum clearance of 48 inches below or 72 inches above grounded metal boxes, hardware or metal cases for equipment associated with supply lines."

ESRB's finding related to the above rule is listed in Table 7:

Table 7: GO 95, Rule 87.4-H Finding

Location	Finding
107	Clearance from metal box to communication lines is <4ft.

7. **GO 95, Rule 86.9 Guy Marker (Guy Guard) states in part:**

   "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 finding related to the above rule is listed in Table 8:

Table 8: GO 95, Rule 86.9 Finding

Location	Finding
87	Missing guy guard.

8. **GO 95, Rule 87.9-D Risers states in part:**

   "(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.

(2) Covered from 8 Feet above the Ground Level and Above:

(a) Risers shall be covered by a suitable protective covering, as defined in Rule 22.8 where within a vertical distance of 3 feet above or 6 feet below the level of unprotected supply conductors when supported on the same pole or structure or within a 6–foot radius of another pole supporting unprotected supply conductors, except that when the riser is protected by a guard arm installed in accordance with Rule 87.4–C3 the 6 feet may be reduced to not less than 4 feet."

ESRB's findings related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 87.9-D Findings

Location	Finding
3	Riser not covered, below 8ft.
13	Missing riser guard.
15	Missing riser guard.
110	Warped and unattached riser guard.
134	Missing riser guard.
141	Missing riser guard.
143	Missing riser guard.
145	Wires outside of riser guard.

9. **GO 95, Rule 84.6-D Vertical and Lateral Conductors, Vertical Runs states in part:**

"Vertical runs of communication wires or cables supported on the surface of wood poles or structures, shall be covered by a suitable protective covering (see Rule 22.8) where within a vertical distance of 3 feet above or 6 feet below unprotected supply conductors supported on the same pole or structure. Vertical runs of communication wires or cables on the surface of a wood pole shall be covered by a suitable protective covering where within a 6-foot radius of any other pole supporting supply conductors except that those portions of such runs which are more than 3 feet above or 6 feet below the level of unprotected supply conductors need not be covered… Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches."

ESRB's findings related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 84.6-D Findings

Location	Finding
72	Unattached riser.
83	Unattached drops.
114	Unattached drops.
117	Riser not properly attached every 24 inches.

10. **GO 95, Rule 84.8C(2)(b) Service Drop Clearances above Ground and Buildings** states in part:

    "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 11:

Table 11: GO 95, Rule 84.8C(2)(b) Finding

Location	Finding
21	Clearance over private driveway ~11 feet.

11. **GO 95, Rule 87.4C(3) Minimum Clearances of Wires from Other Wires states in part:**

    "Cables or messengers where attached to the surface of poles which support supply conductors, shall not be less than 6 feet vertically below the level of supply conductors.

    EXCEPTION: This minimum clearance of 6 feet may be reduced to not less than 4 feet below supply conductors of 0 - 750 volts provided a guard arm is placed above the messenger and cable (or self–supporting cable) in accordance with the provision of Rule 87.7–B (see Rule 21.0–D for guard arm definition). No cable or messenger shall be attached to the surface of such a pole less than 2 feet below the lowest level of communication conductors on crossarms unless a minimum horizontal separation of 30 inches is maintained between the messenger or cable and the communication conductors on the opposite side of pole."

ESRB's findings related to the above rule are listed in Table 12:

Table 12: GO 95, Rule 87.4C(3) Findings

Location	Finding
61	Clearance from secondary to communications is <4ft.
117	Missing guard arm/ clearance less than 6 ft under supply.
141	Missing guard arm/ clearance less than 6 ft under supply.

12. **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 13:

Table 13: GO 128, Rule 17.8 Findings

Location	Finding
39	Missing ownership marking.
43	Missing ownership marking.
45	Missing ownership marking.

46	Missing ownership marking.
47	Missing ownership marking.
48	Missing ownership marking.
49	Missing ownership marking.
50	Missing ownership marking.
51	Missing ownership marking.
52	Missing ownership marking.
77	Missing ownership marking.
78	Missing ownership marking.
96	Missing ownership marking.
133	Missing ownership marking.

13. GO 128, Rule 12.2 Maintenance states in part:

"Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules."

ESRB's findings related to the above rule are listed in Table 14:

Table 14: GO 128, Rule 12.2 Findings

Location	Finding
50	Unsecured lid - fixed in field.
76	Missing pedestal cover.
133	Unsecured cabinet - fixed in field

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 found the following third-party observations in the field, listed in Table 15.

Table 15: Third-Party Observations

Location	Finding
1	Charter has an exposed ground wire. Charter's down guy is missing a guy marker and is in contact with Frontier lines.
2	Charter has an exposed ground wire.
6	Overgrown vegetation is obstructing climbing space access.
10	PG&E's ground wire has detached from pole starting at 3 feet above ground. Charter's riser is also completely unattached and is missing a riser guard.
12	Charter needs to transfer their facilities to the new pole.
13	Charter missing riser guard.
21	Unknown communication company missing riser guard.
23	Charter has a broken cross arm bracket. Overgrown vegetation is obstructing climbing space.
33	Charter's abandoned line is in contact with Frontier's lines.
35	Charter has an abandoned drop. PG&E has an exposed ground wire at pedestrian level and is not secured onto the pole.
53	Pole is curving and leaning.
57	Communication risers are not secured to the pole. PG&E's service drop to a residential building is in contact with the roof.
62	PG&E has a slack down guy.
67	The pole has an unknown third-party attachment (barbed fence).
85	Buddy pole - need to transfer facilities. Charter drop in contact with Frontier line
87	Broken ground wire

87	Broken ground wire
88	Slack / broken down guy
91	Slack down guy and abandoned drop
93	Damaged pole top - span guy attachment compromised
103	Missing riser guard and unattached
105	Buddy pole - need to transfer facilities
106	Idle drops and missing riser guard
121	Climbing space obstructed
122	Comcast missing riser guard
123	Damaged pole
134	PG&E down guy in contact with CATV line
148	Vegetation obstructing climbing space; Insufficient clearance between communication attachment to secondary power
150	Insufficient clearance between communication attachment to secondary power