



1919 McKinney Ave., Dallas, TX 75201
Frontier.com

SENT VIA ELECTRONIC MAIL

November 11, 2024

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

Re: Frontier's Response to Audit of Frontier Communications' LA County North Area.

Dear Fadi Daye,

Frontier California Inc. (U-1002-C) ("Frontier") hereby responds to the October 10, 2024, California Public Utilities Commission (Commission) report regarding the LA County Area communications infrastructure provider audit conducted from September 23, 2024 to September 27, 2024.

I. Records Review

- Inspection records.
- Work order/corrective ticket 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:

General Order (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.

General Order (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 for calendar year 2023-24, Frontier completed 47 repair work orders past Frontier’s scheduled completion dates. Additionally, at the time of the audit, there were 5 open repair work orders that were past their scheduled completion dates.

Response: In the submitted pre-audit data request file “Frontier Confidential LA County North Tickets.xls”, Frontier identified four open repair work orders at the time of the audit as opposed to five as noted in the audit report. The four open repair work orders were prioritized and closed as of November 5, 2024.

- TK3416697 Lancaster (Antelope Acre wire center)
- TK3374062 Lancaster (Antelope wire center)
- TK3416701 Lancaster (Antelope Acre wire center)
- TK3350422 Lancaster (Antelope wire center)

Additionally, in the submitted pre-audit data request file “Frontier Confidential LA County North Tickets.xls” Frontier identified five work orders completed past Frontier’s scheduled completion date during the 2023-2024 calendar year, as opposed to forty-seven as noted in the audit report.

- TK3416699 Lancaster (Antelope Acre wire center)
- TK3416696 Lancaster (Antelope Acre wire center)
- TK3416702 Lancaster (Antelope Acre wire center)
- TK3416700 Lancaster (Antelope Acre wire center)
- TK3416698 Lancaster (Antelope Acre wire center)

III. Field Inspections (*Reference: CA2024-1219 Frontier – LA CO North*)

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection:

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.

Frontier’s facilities on the following pole required maintenance:

The “eye” of the down guy anchor attached to the poles was buried.

- GT94311
- 1451197E
- 734468E
- 1490712E
- 955662E

Response: See attached file “Tickets CPUC Inspections LA County North Audit.xls”.

Missing or damaged pole number tags were observed on each of the following poles:

- 1451195E
- 1295168E
- 1310384E
- K9488Y
- K2195Y
- 709135E
- FTR127920
- K54571Y
- 878812E

Response: See attached file "Tickets CPUC Inspections LA County North Audit.xls".

A damaged visibility strip was observed on each of the following poles:

- 1490712E
- 1295168E
- 627165E
- 1341706E
- 735632E
- 1491436E

Response: See attached file "Tickets CPUC Inspections LA County North Audit.xls".

The lashing wire of the following poles was damaged:

- 991721E
- K5458Y
- GT9431
- 400281E

Response: See attached file "Tickets CPUC Inspections LA County North Audit.xls".

The riser conductor conduit on Pole No. 538732E had detached from the pole.

Response: See attached file "Tickets CPUC Inspections LA County North Audit.xls".

The pole-mounted fiber terminal attached to Pole No. 4466671E was not properly secured to the pole.

Response: See attached file "Tickets CPUC Inspections LA County North Audit.xls".

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

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).

A Frontier communication conductor attached to each of the following poles was strained by vegetation:

- 1451196E
- 1847222E

Response: See attached file "Tickets CPUC Inspections LA County North Audit.xls".

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.

Permanently abandoned service drops was observed on or near each of the following poles:

- 4630916E • 307181E • 4090057E
- 4855074E • 307164E

Response: See attached file "Tickets CPUC Inspections LA County North Audit.xls".

GO 128 Rule 34.3, Self-contained Surface-mounted Equipment, states in part:

Equipment installed partially or completely above the ground surface and not enclosed by a vault, room or fence shall conform to the following:

C. Locking Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.

The following above-ground enclosures were not secured against entry by unauthorized persons by means of locks or other suitable means:

- The Padmount at [REDACTED] and [REDACTED], Palmdale.
- The Padmount 3005, at [REDACTED] and [REDACTED], Palmdale.
- The Padmount XT-BO, at [REDACTED] and [REDACTED], Palmdale.

Response: See attached file "Tickets CPUC Inspections LA County North Audit.xls".

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.

- The lid to the "Manhole" at [REDACTED], Quartz Hill was unsecured.
- The lid to the "Handhole" at [REDACTED], Quartz Hill was unsecured.
- The lid to the "Handhole" at [REDACTED], Quartz Hill was unsecured

Response: See attached file "Tickets CPUC Inspections LA County North Audit.xls".

If you have any questions, please do not hesitate to contact me at 214-724-7719, or judy.geise@ftr.com .

Sincerely,
/s/ Judy Geise
Manager, Compliance
Judy.geise@ftr.com

Attachment

Cc: Jenny Smith, Director Regulatory & Governmental Affairs, Frontier
Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor) ESRB, SED, CPUC
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