

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 8, 2024

CA2024-1114

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

Subject: Audit of Frontier Communications' Riverside County West Service Area

Ms. Geise:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller and Sultan Tipu of my staff conducted a communications infrastructure provider audit of Frontier Communications' Riverside County West Service Area from January 8, 2024 to January 12, 2024. 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 March 8, 2024, 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,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC
Sultan Tipu, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- 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:

GO95, Rule 80, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards §(A)(1), states in part:

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

Frontier's records indicated that for the calendar year 2023, Frontier had completed 2 repair work orders after their scheduled completion dates. Additionally, at the time of the audit, there were 104 open repair work orders that were past their scheduled completion dates.

GO95, Rule 44.1, Installation and Reconstruction, states in part:

Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

SED staff discovered the following discrepancies between Frontier's pole loading records and conditions in the field:

- The pole loading records for Pole No. 4784303E indicated that the pole supported only one communications conductor at a height of 36 feet. My staff observed that the pole actually supported two communications conductors at heights of 26 and 28 feet.
- My staff observed a span guy wire attached to the north side of Pole No. 4784302E which was not accounted for in the pole loading calculations provided.

III. Field Inspections

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

No.	Facility Identification	Facility Type	Location
1	2139796S	Pole	Quail Valley
2	213976S	Pole	Quail Valley
3	213978S	Pole	Quail Valley
4	4524024E	Pole	Quail Valley
5	GT60807	Pole	Quail Valley
6	1750773E	Pole	Quail Valley
7	4791515E	Pole	Quail Valley
8	4771120E	Pole	Quail Valley
9	GT109560	Pole	Quail Valley
10	4317657E	Pole	Quail Valley
11	28080CWT	Pole	Quail Valley
12	4607462E	Pole	Quail Valley
13	216742S	Pole	Quail Valley
14	216743S	Pole	Quail Valley
15	4799724E	Pole	Quail Valley
16	4299391E	Pole	Quail Valley
17	216745S	Pole	Quail Valley
18	4151042E	Pole	Quail Valley
19	GT140480	Pole	Lake Elsinore
20	4060489E	Pole	Lake Elsinore
21	GT94866	Pole	Lake Elsinore
22	17343CWT	Pole	Lake Elsinore
23	17347	Pole	Lake Elsinore
24	4958110E	Pole	Lake Elsinore
25	4043515E	Pole	Lake Elsinore
26	4524476E	Pole	Lake Elsinore
27	127	Pole	Lake Elsinore
28	212302S	Pole	Lake Elsinore
29	19805CWT	Pole	Lake Elsinore
30	2014492E	Pole	Lake Elsinore
31	19808CWT	Pole	Lake Elsinore
32	2245447E	Pole	Lake Elsinore
33	17411 Custer Street	Hand-hole	Lake Elsinore
34	2150516E	Pole	Lake Elsinore
35	4715458E	Pole	Lake Elsinore
36	2361622E	Pole	Lake Elsinore
37	2065583E	Pole	Lake Elsinore
38	1971052E	Pole	Lake Elsinore

39	4710897E	Pole	Lake Elsinore
40	17416 Cottrell Boulevard	Hand-hole	Lake Elsinore
41	4938496E	Pole	Perris
42	4938481E	Pole	Perris
43	4938480E	Pole	Perris
44	250001GT	Pole	Perris
45	4871208E	Pole	Perris
46	4938476E	Pole	Perris
47	250002	Pole	Perris
48	4632122E	Pole	Perris
49	250004	Pole	Perris
50	4869669E	Pole	Perris
51	2012060E	Pole	Perris
52	90093	Pole	Perris
53	GT4345	Pole	Perris
54	4781304E	Pole	Perris
55	4726458E	Pole	Perris
56	311796	Pole	Perris
57	4819427E	Pole	Perris
58	4819426E	Pole	Perris
59	250012	Pole	Perris
60	13820WT	Pole	Perris
61	2150480E	Pole	Perris
62	4632116E	Pole	Perris
63	13818CWT	Pole	Perris
64	4166082E	Pole	Perris
65	13817CWT	Pole	Perris
66	4059453E	Pole	Perris
67	250011	Pole	Perris
68	250010	Pole	Perris
69	13816T	Pole	Perris
70	Gentian Ave. & Canyonstone Dr.	Vault	Moreno Valley
71	Gentian Ave. & Canyonstone Dr.	Fiber Hub	Moreno Valley
72	T2626253	Hand-hole	Moreno Valley
73	Next to T2626253	Pedestal	Moreno Valley
74	T2626209	Hand-hole	Moreno Valley
75	T2626270	Hand-hole	Moreno Valley
76	T2626290	Hand-hole	Moreno Valley
77	T2626295	Hand-hole	Moreno Valley
78	T2626366	Hand-hole	Moreno Valley
79	T2626487	Hand-hole	Moreno Valley
80	T2626489	Hand-hole	Moreno Valley
81	15340 Canyonstone Dr.	Pedestal	Moreno Valley

82	15250 Canyonstone Dr.	Pedestal	Moreno Valley
83	24171 Poppystone Dr.	Pedestal	Moreno Valley
84	24156 Poppystone Dr.	Flower Pot	Moreno Valley
85	24141 Poppystone Dr.	Pedestal	Moreno Valley
86	24077 Stonebridge Ct.	Flower Pot	Moreno Valley
87	24093 Stonebridge Ct.	Hand-hole	Moreno Valley
88	4223B	Pedestal	Moreno Valley
89	T116631	Combination Structure	Sun City
90	T116668	Combination Structure	Sun City
91	6234B	Combination Structure	Sun City
92	6235B	Combination Structure	Sun City
93	28390 North Star Ln.	Combination Structure	Sun City
94	T116662	Combination Structure	Sun City
95	T116661	Combination Structure	Sun City
96	T116660	Combination Structure	Sun City
97	T116659	Combination Structure	Sun City
98	T116658	Combination Structure	Sun City
99	28826 Keri Lynn Ave	Pull Box	Murrieta
100	860	Manhole	Murrieta
101	28861 Keri Lynn Ave	Hand-hole	Murrieta
102	28879 Keri Lynn Ave	Hand-hole	Murrieta
103	T128505	Hand-hole	Murrieta
104	T128587	Hand-hole	Murrieta
105	T128508	Hand-hole	Murrieta
106	2328276E	Pole	Hemet
107	2328275E	Pole	Hemet
108	2328274E	Pole	Hemet
109	2328273E	Pole	Hemet
110	2328272E	Pole	Hemet
111	2328271E	Pole	Hemet
112	4784303E	Pole	Hemet
113	4784302E	Pole	Hemet
114	4784301E	Pole	Hemet
115	315248S	Pole	Hemet

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection:

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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 down guy wire on each of the following poles was not taut:

- 4784303E
- 2328276E

GO 95, Rule 91.3 Stepping, 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.

The lowest pole step on Pole No. 212302S was located at a height of less than eight feet.

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.

Unauthorized foreign attachments were observed on the following poles:

- Pole No. 4771120E supported an unauthorized “Free Junk Car Removal” sign.
- Pole No. 4799724E supported an unauthorized sign advertising a yard sale.
- Pole No. 4299391E supported an unauthorized fence post that had been nailed to the pole.
- Pole No. 4151042E supported an unauthorized “Free Junk Car Removal” sign.
- Pole No. 4958110E supported an unauthorized “Missing Dog” sign.
- Pole No. 2245447E supported an unauthorized speed limit sign.
- Pole No. 2328276E supported an unauthorized sign advertising a trust and will service.
- Pole No. 250002 supported an unauthorized street sign.
- Pole No. 250012 supported an unauthorized thermometer.

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.

Damaged visibility strips were observed on each of the following poles:

- 4059453E
- 250012
- 4607462E
- The cover to the terminal on Pole No. 4317657E was not properly secured to the terminal.
- The P-clamp on a service drop from Pole No. GT140480 had become detached.
- The lashing wire south of Pole No. 4958110E was damaged.
- The riser conductor on Pole No. 2245447E had detached from the pole.
- The splice case on Pole No. 4710897E was missing its cover.
- The copper splice on Pole No. 4710897E was not properly secured to the span wire and was dangling from one end.
- The housing of the pole-mounted terminal on Pole No. 4871208E was slightly open.
- The terminal box attached to Pole No. 4819427E was not properly secured to the pole.
- The pole-mounted fiber terminal attached to Pole No. 13817CWT was not properly secured to the pole.
- The pole-mounted terminal on Pole No. 216743S was damaged.

GO 95, Rule 56.4, Clearances, states in part:

The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall not be less than as specified in Table 2, Case 19.

- Table 2, Column C, Case 19 requires guy wires and communications conductors supported on the same pole to maintain a radial clearance of three inches.
- A frontier communications conductor was in contact with a third-party span guy wire west of Pole No. 2328276E.

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.

Abandoned service drops were observed on or near the following poles:

- 4791515E
- 17347
- 2014492E

- 311796

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.

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

- | | | |
|------------|------------|------------|
| • 2139796E | • 4524476E | • 4869669E |
| • 213978S | • 19805CWT | • 2012060E |
| • 4524024E | • 19808CWT | • 4819427E |
| • GT60807 | • 4715458E | • 4632116E |
| • 4299391E | • 1971052E | • 13818CWT |
| • 216745S | • 4938481E | • 13817CWT |
| • 17343CWT | • 4938480E | |
| • 4958110E | • 4938476E | |

GO 95, Rule 84.8-C3b: Above Ground in Areas Accessible to Pedestrians Only, states in part:

Residential Premises: 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.

Frontier communications conductors on or near the following poles passed over private yards at a height of less than 8 feet 6 inches:

- 4060489E
- 17343CWT

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.

- Hand-hole T2626290 was full of earth and debris.
- The base of the pedestal at 15250 Canyonstone Drive was damaged.
- The lid of Combination Structure 6234B was damaged.
- The locking mechanism and lid of Combination Structure T116662 were damaged and/or broken.

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 Pedestal at 15340 Canyonstone Drive
- Combination Structure No. T116668
- Combination Structure No. 6234B
- Combination Structure No. T116662

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 “flower pot” at 24077 Stonebridge Court was unsecured.