

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 29, 2024

CA2024-1125

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

Subject: Audit of Frontier Communications' Ventura County Area

Ms. Geise:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Kyle King and Sultan Tipu of my staff conducted a communications infrastructure provider audit of Frontier Communications' Ventura County Area from March 11-15, 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 April 29, 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 Kyle King at (213) 222-3260 or Kyle.King@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
Derek Fong, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Kyle King, 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 calendar year 2023, Frontier completed 2 repair work orders past Frontier's scheduled completion dates. Additionally, at the time of the audit, there were 104 open repair work orders that were past their scheduled completion dates.

III. Field Inspections

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

No.	Facility Identification	Facility Type	Location
1	376665E	Pole	Camarillo
2	4047163E	Pole	Camarillo
3	2241509E	Pole	Camarillo
4	4047172E	Pole	Camarillo
5	376668E	Pole	Camarillo
6	4412775E	Pole	Camarillo
7	859213E	Pole	Camarillo
8	1540095E PLC	Pole	Camarillo
9	1662429E PLC	Pole	Camarillo
10	829 Via Alondra	Hand-hole	Camarillo
11	709 Vi a Alondra	Hand-hole	Camarillo
12	CMRLCAXE 332B	Man-hole	Camarillo
13	CMRLCAXE 331B	Man-hole	Camarillo
14	CMRLCAXE 280B	Man-hole	Camarillo
15	910192E	Pole	Oxnard
16	1096103E	Pole	Oxnard
17	1096104E	Pole	Oxnard
18	X9203Y	Pole	Oxnard
19	1081243E	Pole	Oxnard
20	X9202Y	Pole	Oxnard
21	1081242E	Pole	Oxnard
22	X8691Y	Pole	Oxnard
23	1081231E	Pole	Oxnard
24	X8690Y	Pole	Oxnard
25	1081230E	Pole	Oxnard
26	X16244Y	Pole	Oxnard
27	1081219E	Pole	Oxnard
28	4011370E	Pole PLC	Oxnard
29	4239918E	Pole PLC	Oxnard
30	4011356E	Pole WOV	Point Mugu
31	2359818E	Pole	Point Mugu
32	2359819E	Pole	Point Mugu
33	2359820E	Pole	Point Mugu
34	2359809E	Pole	Point Mugu
35	2359821E	Pole	Point Mugu
36	2359822E	Pole	Point Mugu
37	2359823E	Pole	Point Mugu
38	2359824E	Pole	Point Mugu

39	2359826E	Pole	Point Mugu
40	1332059E	Pole WOV	Newbury Park
41	1332058E	Pole	Newbury Park
42	1709725E	Pole	Newbury Park
43	1332057E	Pole	Newbury Park
44	1709724E	Pole	Newbury Park
45	4216286E	Pole	Newbury Park
46	T3780Y	Pole	Newbury Park
47	1584903E	Pole	Newbury Park
48	4754793E	Pole	Newbury Park
49	4754794E	Pole	Newbury Park
50	1364553E	Pole PLC	Newbury Park
51	1754468E	Pole PLC	Newbury Park
52	208 Lupe Ave	Hand-hole	Newbury Park
53	190 Lupe Ave	Pedestal	Newbury Park
54	209 Lupe Ave	Pedestal	Newbury Park
55	237 Lupe Ave	Pedestal	Newbury Park
56	223 Lupe Ave	Flowerpot	Newbury Park
57	236 Lupe Ave	Hand-hole	Newbury Park
58	264 Lupe Ave	Hand-hole	Newbury Park
59	250 Lupe Ave	Hand-hole	Newbury Park
60	265 Lupe Ave	Flowerpot	Newbury Park
61	278 Lupe Ave	Pedestal	Newbury Park
62	291 Hiram Ave	Pedestal	Newbury Park
63	275 Hiram Ave	Flowerpot	Newbury Park
64	290 Hiram Ave	Hand-hole	Newbury Park
65	258 Hiram Ave	Hand-hole	Newbury Park
66	242 Hiram Ave	Pedestal	Newbury Park
67	206 Hiram Ave	Hand-hole	Newbury Park
68	224 Hiram Ave	Hand-hole	Newbury Park
69	2751 Almira St.	Pedestal	Newbury Park
70	2717 Almira St.	Hand-hole	Newbury Park
71	2690 Almira St.	Flowerpot	Newbury Park
72	799128E	Pole WOV	Santa Paula
73	799129E	Pole	Santa Paula
74	799020E	Pole	Santa Paula
75	799019E	Pole	Santa Paula
76	1041992E	Pole	Santa Paula
77	4631582E	Pole	Santa Paula
78	4592260E	Pole	Santa Paula
79	1702809E	Pole	Santa Paula
80	120803E	Pole	Santa Paula
81	1424688E	Pole	Santa Paula

82	1436503E	Pole	El Rio
83	1436504E	Pole WOV	El Rio
84	1436505E	Pole	El Rio
85	1436506E	Pole	El Rio
86	1436507E	Pole	El Rio
87	1540727E	Pole	El Rio
88	1540728E	Pole	El Rio
89	X13822Y	Pole	El Rio
90	Missing/not legible	Pole	El Rio
91	1364758E	Pole	El Rio
92	1500710E	Pole	Conejo Valley
93	1500709E	Pole	Conejo Valley
94	1401725E	Pole	Conejo Valley
95	GT92581	Pole	Conejo Valley
96	GT7381	Pole	Conejo Valley
97	1401743E	Pole	Conejo Valley
98	1444101E	Pole WOV	Thousand Oaks
99	T3617Y	Pole	Thousand Oaks
100	1444102E	Pole	Thousand Oaks
101	1444103E	Pole	Thousand Oaks
102	1444104E	Pole	Thousand Oaks
103	1444105E	Pole	Thousand Oaks
104	1444106E	Pole	Thousand Oaks
105	1444107E	Pole	Thousand Oaks
106	1444108E	Pole	Thousand Oaks
107	1444109E	Pole	Thousand Oaks
108	1444110E	Pole	Thousand Oaks
109	1444111E	Pole	Thousand Oaks
110	1444112E	Pole	Thousand Oaks
111	4382740E	Pole	Thousand Oaks
112	946841E	Pole PLC	Thousand Oaks
113	4557838E	Pole PLC	Thousand Oaks
114	2019594E	Pole	Thousand Oaks
115	1365054E	Pole	Thousand Oaks
116	1365055E	Pole	Thousand Oaks
117	2197466E	Pole	Thousand Oaks
118	4365350E	Pole	Thousand Oaks
119	803590E	Pole	Thousand Oaks
120	T1374Y	Pole	Thousand Oaks
121	2102460E	Pole	Thousand Oaks
122	2102461E	Pole	Thousand Oaks

123	1278935E	Pole	Thousand Oaks
124	2624 Rikkard Dr.	Hand-hole	Thousand Oaks
125	2625 Rikkard Dr.	Hand-hole	Thousand Oaks
126	2649 Rikkard Dr.	Hand-hole	Thousand Oaks
127	2673 Rikkard Dr.	Hand-hole	Thousand Oaks
128	2697 Rikkard Dr.	Hand-hole	Thousand Oaks

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 supporting Pole number 1278935E was not taut.

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:

- 1436503E
- 1444101E
- 1444102E
- 1444105E
- 1444106E
- 1444109E
- 1444110E

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.

Pole number 1702809E supported an unauthorized “Resident parking Only” sign.

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.

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

- Pole X8690Y (this pole is adjacent to poles numbered 1081230E and 1081231E)
- Pole number illegible (this pole is adjacent to poles numbered X13822Y and 1364758E)

Facilities on the following poles required maintenance:

- Pole 1540728E: the fiber terminal is abandoned and dangling from one end.
- Pole 1436507E: the copper terminal box was open.
- Pole 4047163E: Frontier communication cables were not properly secured to the pole.

GO 95, Rule 54.6-B, Ground Wires, states in part:

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground moulding attached to each of the following poles was damaged:

- 1365055E
- 2019594E
- 1436506E
- 1444111E

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 Pole number 1436506E was obstructed by vegetation.

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:

- 1096103E
- 1709724E
- 799128E
- 1436503E
- 1436504E
- 1436505E
- 1540728E
- 1500710E
- T1374Y

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8, requires the minimum vertical clearance between “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 touching third-party communications conductors on or near each of the following poles:

- 2241509E
- 376665E
- 1444101E
- T3617
- 1444108E

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 communication or supply lines and equipment.

The cover of the pedestal at 209 Lupe Avenue was damaged.

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.

Covers on the following manholes and handholes were not secure:

- The cover to the “Hand-hole” at 709 Via Alondra was unsecured and rusty.
- The cover to the “Hand-hole” at 829 Via Alondra was broken and rusty.
- The cover to the “Pedestal” at 291 Hiram Ave. was missing.
- The cover to the “Pedestal” at 242 Hiram Ave. was not secured.