

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 30, 2024

CA2024-1188

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

**SUBJECT:** Communication Infrastructure Provider (CIP) Audit of Frontier North – Williams, Maxwell, Princeton, Colusa, Arbuckle, Grimes, Guinda, Knights Landing, and Robbins

Ms. Smith:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Emiliano Solorio of ESRB conducted a CIP audit of Frontier's Williams, Maxwell, Princeton, Colusa, Arbuckle, Grimes, Guinda, Knights Landing, and Robbins wire centers from April 15, 2024 through April 19, 2024. During the audit, ESRB staff conducted field inspections of Frontier's communications facilities 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 is enclosed. Please provide a response no later than September 30, 2024, 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.

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 Brandon Vazquez at (628) 249-2867 or [brandon.vazquez@cpuc.ca.gov](mailto:brandon.vazquez@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

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

Enclosure: CPUC CIP Audit Report for Frontier North – Williams, Maxwell, Princeton, Colusa, Arbuckle, Grimes, Guinda, Knights Landing, and Robbins

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC  
Nika Kjensli, Program Manager, ESRB, SED, CPUC  
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC  
Yi Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC  
Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC  
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC  
Judy Geise, Manager - Regulatory, Frontier

**CPUC AUDIT FINDINGS  
FRONTIER NORTH – WILLIAMS CIP AUDIT  
APRIL 15-19, 2024**

**I. Records Review**

During the audit, Electric Safety and Reliability Branch (ESRB) reviewed the following records:

- Frontier’s facilities statistics.
- Frontier Facility Maps for each Wire Center.
- Frontier’s General Order (GO) 95 and GO 128 inspection programs.
- Frontier’s inspector training program.
- Patrol and detailed-inspection records for the last five years.
- Work order records for overhead and underground Frontier facilities for the last five years.
- Third Party Safety Hazard notifications for the last five years.
- Pole loading and safety factor calculations completed in the last twelve months.
- Intrusive pole tests conducted in the last three years.
- New construction projects completed in the last twelve months.

**II. Records Violations**

ESRB observed the following violations during the record review portion of the audit:

**1. 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.”*

ESRB’s review of Frontier’s tickets from February 2019 through February 2024 found that Frontier had 72 late-pending tickets and 23 late-closed tickets. Late-pending tickets are pending tickets that have not been completed by their assigned due date based on their hazard level, and late-closed tickets are tickets that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 95 late tickets by hazard level, including the total number of late tickets, as well as late-pending and late-closed tickets, which are included in the total.

**Table 1: Late Tickets**

| <b>Hazard Level</b> | <b>Total Late Tickets</b> | <b>Late-Pending Tickets</b> | <b>Late-Closed Tickets</b> |
|---------------------|---------------------------|-----------------------------|----------------------------|
| 1                   | 1                         | -                           | 1                          |
| 2                   | 94                        | 72                          | 22                         |
| 3                   | -                         | -                           | -                          |
| <b>Total</b>        | 95                        | 72                          | 23                         |

**2. GO 128, Rule 17.2, Inspection** states in part:

*“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.”*

**Frontier Inspection Maintenance Procedure (January 2024)** states in part:

*“GO 128 requires communications systems to be “inspected by the operator frequently and thoroughly” to ensure that they are in “good condition.” GO 128, Rule 17.2. Frontier California complies with this requirement.*

*Frontier California has regular Manhole T-Zone inspections, which requires that Field Technicians examine the entire manhole for defects.”*

Frontier did not provide any underground patrol or inspection records for the period of February 2019 through February 2024. Therefore, Frontier is not in compliance with GO 128, Rule 17.2 and Frontier Inspection Maintenance Procedure which require frequent and thorough inspections. Frontier needs to update its procedures indicating required patrol and inspection time intervals to ensure that all its underground communication facilities are subject to the required inspections per GO 128, Rule 17.2.

### III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

| Location # | Structure #       | Type of Structure | Structure Location/Address         | City         |
|------------|-------------------|-------------------|------------------------------------|--------------|
| 1          |                   | Frontier Pole     | Rear of 1765 Lurline Avenue        | Colusa       |
| 2          |                   | Frontier Pole     | Rear of 1765 Lurline Avenue        | Colusa       |
| 3          |                   | Frontier Pole     | 39°13'0.88"N, 122° 1'31.14"W       | Colusa       |
| 4          | CPN1210           | Joint Comms Pole  | 1718 Lurline Avenue                | Colusa       |
| 5          |                   | Frontier Pole     | Across from 7006 Fruitvale Ave     | Colusa       |
| 6          |                   | Frontier Pole     | Across from 7006 Fruitvale Ave     | Colusa       |
| 7          |                   | Joint PG&E Pole   | 39.217, -122.014                   | Colusa       |
| 8          | FTR702382         | Joint PG&E Pole   | 38.9439, -122.093                  | Arbuckle     |
| 9          | CPN1583           | Frontier Pole     | 38°56'38.50"N, 122° 5'34.51"W      | Arbuckle     |
| 10         |                   | Pedestal          | 38°56'38.50"N, 122° 5'34.51"W      | Arbuckle     |
| 11         | PG&E<br>121444141 | Joint PG&E Pole   | 38°56'38.71"N,122° 5'35.02"W       | Arbuckle     |
| 12         |                   | Joint PG&E Pole   | 38.9694, -122.07                   | Arbuckle     |
| 13         |                   | Joint PG&E Pole   | 38°58'9.68"N, 122° 4'12.23"W       | Arbuckle     |
| 14         | FTR702120         | Joint PG&E Pole   | 38°58'9.77"N, 122° 3'28.43"W       | Arbuckle     |
| 15         | FTR702119         | Joint PG&E Pole   | 38°58'9.74"N, 122° 3'33.85"W       | Arbuckle     |
| 16         | FTR702103         | Joint PG&E Pole   | 38.9694, -122.054                  | Arbuckle     |
| 17         |                   | Frontier Pole     | 39.0039, -122.007                  | Arbuckle     |
| 18         |                   | Frontier Pole     | 9th St and Main St                 | College City |
| 19         | FTR702057         | Frontier Pole     | 39° 0'15.65"N, 122° 0'23.07"W      | College City |
| 20         | PG&E<br>120955761 | Joint PG&E Pole   | 39° 0'16.78"N, 122° 0'22.86"W      | College City |
| 21         | CPU836            | Frontier Pole     | 39° 0'12.06"N, 122° 0'25.21"W      | College City |
| 22         | FTR702051         | Frontier Pole     | 39.0189, -122.055                  | Arbuckle     |
| 23         | PG&E<br>121001464 | Joint PG&E Pole   | Rear of 101 3rd St                 | Arbuckle     |
| 24         | FTR702052         | Frontier Pole     | Rear of 101 3rd St                 | Arbuckle     |
| 25         | CPN1072           | Joint PG&E Pole   | 808 Hall St                        | Arbuckle     |
| 26         |                   | Joint PG&E Pole   | 704 Hall St                        | Arbuckle     |
| 27         |                   | Joint PG&E Pole   | 7th St and Hall St                 | Arbuckle     |
| 28         | CPN1548           | Frontier Pole     | 614 Hall St                        | Arbuckle     |
| 29         |                   | Frontier Pole     | 1 Pole North of 5543 Sand Creek Rd | Arbuckle     |
| 30         |                   | Pedestal          | Next to Loc 29                     | Arbuckle     |
| 31         |                   | Frontier Pole     | 5543 Sand Creek Rd                 | Arbuckle     |
| 32         |                   | Pedestal          | Next to Loc 31                     | Arbuckle     |
| 33         |                   | Joint PG&E Pole   | 927 9th St                         | Williams     |
| 34         | CPU912            | Frontier Pole     | Rear of 885 I St                   | Williams     |
| 35         | CPN1149           | Frontier Pole     | Rear of 873 I St                   | Williams     |

|    |         |                             |                                |           |
|----|---------|-----------------------------|--------------------------------|-----------|
| 36 |         | Frontier Pole               | Rear of 855 I St               | Williams  |
| 37 |         | Joint PG&E Pole             | 944 Zumwalt Rd                 | Williams  |
| 38 |         | Joint PG&E Pole             | 1000 Nicolaus Dr               | Williams  |
| 39 |         | Joint PG&E Pole             | 5714 E St                      | Williams  |
| 40 |         | Frontier Pole               | 39° 9'8.64"N, 122° 9'51.33"W   | Williams  |
| 41 |         | Frontier Pole               | 39° 9'8.72"N, 122° 9'53.81"W   | Williams  |
| 42 | CPN1493 | Frontier Pole               | 39° 9'8.72"N, 122° 9'54.73"W   | Williams  |
| 43 | CPN1568 | Frontier Pole               | Rear of 110 6th St             | Williams  |
| 44 |         | Joint PG&E Pole             | 667 A St                       | Williams  |
| 45 |         | Joint Comms Pole            | Rear of 140 6th St             | Williams  |
| 46 |         | Joint Secondary Pole        | Rear of 140 6th St             | Williams  |
| 47 |         | Joint Secondary Pole        | Rear of 140 6th St             | Williams  |
| 48 |         | Frontier Pole               | B St and 6th St                | Williams  |
| 49 |         | Joint PG&E Pole             | B St and 6th St                | Williams  |
| 50 |         | Pedestal                    | B St and 6th St                | Williams  |
| 51 |         | Frontier Pole               | 1 Pole East of B St and 6th St | Williams  |
| 52 |         | Frontier Pole               | B St and 5th St                | Williams  |
| 53 |         | Joint PG&E Pole             | 5169 Maxwell Sites Rd          | Maxwell   |
| 54 |         | Joint PG&E Pole             | 5169 Maxwell Sites Rd          | Maxwell   |
| 55 |         | Joint PG&E Pole             | 39.2762, -122.2                | Maxwell   |
| 56 | CPU488  | Frontier Pole               | 512 Sites Maxwell Rd           | Maxwell   |
| 57 | CPU489  | Joint PG&E Pole             | 454 Sites Maxwell Rd           | Maxwell   |
| 58 |         | Frontier Pole               | 446 Sites Maxwell Rd           | Maxwell   |
| 59 | CPU735  | Frontier Pole               | 260 Bismark Ave                | Maxwell   |
| 60 | CPU733  | Frontier Pole               | 260 Bismarck Ave               | Maxwell   |
| 61 |         | Frontier Pole               | 266 Bismark Ave                | Maxwell   |
| 62 | CPU734  | Frontier Pole               | 270 Bismark Ave                | Maxwell   |
| 63 | CPU732  | Frontier Pole               | 265 Bismark Ave                | Maxwell   |
| 64 |         | Frontier Pole               | 4789 Old Hwy 99W               | Maxwell   |
| 65 |         | Joint PG&E Pole             | 4789 Old Hwy 99W               | Maxwell   |
| 66 |         | Frontier Pole               | 39°21'25.05"N, 122°11'18.94"W  | Delevan   |
| 67 | T155    | Pedestal                    | 39°21'25.05"N, 122°11'18.94"W  | Delevan   |
| 68 |         | Joint PG&E Pole             | 5533 1st St                    | Delevan   |
| 69 |         | Joint PG&E Pole             | 7047 Norman Rd Unit 7          | Princeton |
| 70 |         | Frontier Pole               | 7047 Norman Rd Unit 5          | Princeton |
| 71 |         | Joint PG&E Pole             | 7047 Norman Rd                 | Princeton |
| 72 |         | Frontier Pole               | 7051 Norman Rd                 | Princeton |
| 73 |         | Joint SmartMeter Pole       | 7049 Norman Rd                 | Princeton |
| 74 |         | Joint PG&E Transformer Pole | 7049 Norman Rd                 | Princeton |
| 75 |         | PG&E Pole                   | 7049 Norman Rd                 | Princeton |

|     |                   |                   |                                 |           |
|-----|-------------------|-------------------|---------------------------------|-----------|
| 76  |                   | Joint PG&E Pole   | 6999 Norman Rd                  | Princeton |
| 77  |                   | Frontier Pole     | 1 Pole East of Loc 76           | Princeton |
| 78  |                   | Joint PG&E Pole   | 39°24'39.78"N, 122° 0'39.49"W   | Princeton |
| 79  |                   | Joint PG&E Pole   | Schmidt Rd and Hwy 45           | Princeton |
| 80  | CPU434            | Frontier Pole     | Schmidt Rd and Hwy 45           | Princeton |
| 81  |                   | Joint PG&E Pole   | 39.4015, -122.01                | Princeton |
| 82  |                   | Frontier Pole     | 155 HWY 45                      | Princeton |
| 83  |                   | PG&E Pole         | 155 HWY 45                      | Princeton |
| 84  | PG&E<br>121703362 | PG&E Pole         | 39°21'42.74"N, 121°59'53.39"W   | Colusa    |
| 85  | T489              | Pedestal          | 39°21'42.74"N, 121°59'53.39"W   | Colusa    |
| 86  |                   | Frontier Pole     | 39.2427, -121.954               | Colusa    |
| 87  |                   | Frontier Pole     | 1 Pole Northwest of Loc 86      | Colusa    |
| 88  |                   | Frontier Pole     | 39.1953, -122.06                | Colusa    |
| 89  |                   | Joint PG&E Pole   | 39°12'35.22"N, 122° 1'0.81"W    | Colusa    |
| 90  |                   | Joint Pole        | Fremont St and 10th St          | Colusa    |
| 91  | CPU485            | Frontier Pole     | 39°12'32.14"N, 122° 1'2.02"W    | Colusa    |
| 92  |                   | Frontier Pole     | Carson St and 10th St           | Colusa    |
| 93  |                   | Joint Comms Pole  | 943 Carson St                   | Colusa    |
| 94  |                   | Frontier Pole     | 759 Sioc St                     | Colusa    |
| 95  | CPU253            | Frontier Pole     | 713 Sioc St                     | Colusa    |
| 96  |                   | Joint PG&E Pole   | 7th St and Tuttle Ln            | Colusa    |
| 97  |                   | Joint PG&E Pole   | 1750 Wescott Rd                 | Colusa    |
| 98  |                   | Joint PG&E Pole   | 1800 Wescott Rd                 | Colusa    |
| 99  |                   | Joint PG&E Pole   | 1734 Wescott Rd                 | Colusa    |
| 100 | CPU778            | Joint Comms Pole  | 1722 Wescott Rd                 | Colusa    |
| 101 | FTR702626         | Frontier Pole     | 39°12'2.55"N, 122° 0'11.16"W    | Colusa    |
| 102 |                   | Joint Comms Pole  | 39°12'4.15"N, 122° 0'12.07"W    | Colusa    |
| 103 |                   | Joint Comms Pole  | 39°12'5.83"N, 122° 0'13.01"W    | Colusa    |
| 104 |                   | Joint Comms Pole  | 39°12'7.45"N, 122° 0'13.88"W    | Colusa    |
| 105 | PG&E<br>121142829 | Joint PG&E Pole   | 257 Florimond Dr                | Colusa    |
| 106 |                   | Joint PG&E Pole   | Butte Vista Dr and Florimond Dr | Colusa    |
| 107 |                   | Joint PG&E Pole   | 236 Florimond Dr                | Colusa    |
| 108 | PG&E<br>121142832 | Joint PG&E Pole   | 210 Florimond Dr                | Colusa    |
| 109 |                   | Pedestal          | 39° 7'22.60"N, 121°57'39.51"W   | Meridian  |
| 110 | PG&E<br>121140766 | Joint PG&E Pole   | 39° 7'22.60"N, 121°57'39.51"W   | Meridian  |
| 111 | CPN1553           | Frontier Guy Pole | 39° 7'22.91"N, 121°57'39.35"W   | Meridian  |
| 112 | T47               | Joint PG&E Pole   | 39° 4'30.72"N, 121°53'46.36"W   | Grimes    |
| 113 |                   | Frontier Pole     | 380 Balsdon St                  | Grimes    |
| 114 |                   | Frontier Pole     | Grimes-Arbuckle Rd and 6th St   | Grimes    |
| 115 |                   | Joint PG&E Pole   | 39.0714, -121.898               | Grimes    |

|     |                   |                 |                                   |                 |
|-----|-------------------|-----------------|-----------------------------------|-----------------|
| 116 | FTR500081         | Joint PG&E Pole | 499 W Leven St                    | Grimes          |
| 117 |                   | Frontier Pole   | 499 W Leven St                    | Grimes          |
| 118 | FTR500051         | Joint PG&E Pole | 180 5th St                        | Grimes          |
| 119 | FTR500076         | Frontier Pole   | 39.0566, -121.96                  | Grimes          |
| 120 |                   | Pedestal        | 39° 3'23.88"N, 121°57'35.56"W     | Grimes          |
| 121 |                   | Pedestal        | 39° 3'23.80"N, 121°57'35.95"W     | Grimes          |
| 122 |                   | Pedestal        | 39° 3'23.79"N, 121°57'35.91"W     | Grimes          |
| 123 |                   | Pedestal        | 38.8908, -121.728                 | Robbins         |
| 124 |                   | Pedestal        | 38.8803, -121.746                 | Robbins         |
| 125 |                   | Pedestal        | 38.8803, -121.746                 | Robbins         |
| 126 |                   | Pedestal        | 38°52'48.99"N, 121°44'43.13"W     | Robbins         |
| 127 |                   | Pedestal        | 38°52'49.01"N, 121°44'43.04"W     | Robbins         |
| 128 | 27353VZ           | Joint PG&E Pole | 38.8067, -121.707                 | Knights Landing |
| 129 | CTC1011980        | Frontier Pole   | 4833 Ensley Rd                    | Knights Landing |
| 130 | 27354VZ           | Joint PG&E Pole | Across from 4833 Ensley Rd        | Knights Landing |
| 131 | PG&E<br>120766431 | Joint PG&E Pole | 38.7994, -121.721                 | Knights Landing |
| 132 | PG&E<br>120383905 | Joint PG&E Pole | Locust St and 6th St              | Knights Landing |
| 133 | PG&E<br>120383904 | Joint PG&E Pole | Southwest of Locust St and 6th St | Knights Landing |
| 134 | CTC1221239        | Frontier Pole   | Locust St and 7th St              | Knights Landing |
| 135 | CTC1010290        | Frontier Pole   | 38.7932, -121.768                 | Knights Landing |
| 136 |                   | Pedestal        | 38.7932, -121.768                 | Knights Landing |
| 137 |                   | Pedestal        | 38°47'35.53"N, 121°46'22.14"W     | Knights Landing |

**IV. Field Inspection Violations**

ESRB observed 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.”*

- 1.1. Frontier Pole at the rear of 1765 Lurline Avenue in Colusa (Location 1) has a buried anchor.
- 1.2. Frontier Pole at the rear of 1765 Lurline Avenue in Colusa (Location 2) has a damaged and open terminal.
- 1.3. Joint Pole # CPN1210 at 1718 Lurline Avenue in Colusa (Location 4) has a damaged terminal.
- 1.4. Frontier’s facilities need to be transferred to the new Joint Pole at GPS coordinates 39.217, -122.014 in Colusa (Location 7).



- 1.5. Joint Pole # FTR702103 located at GPS coordinates 38.9694, -122.054 in Arbuckle (Location 16) has a broken lashing wire at midspan. Frontier has a preexisting Ticket # 3374234 to repair the lashing wire.
- 1.6. Frontier Pole # FTR702051 located at GPS coordinates 39.0189, -122.055 in Arbuckle (Location 22):
  - Is missing a terminal cover. Frontier has a preexisting Ticket # 3374227 to repair the terminal.
  - Is missing high-vis strips.
- 1.7. Frontier Pole # FTR702052 at the rear of 101 3rd St in Arbuckle (Location 24) is missing high-vis strips.
- 1.8. Joint Pole at 927 9th St in Williams (Location 33) is missing a terminal cover. Frontier has a preexisting Ticket # 3251661 to repair the terminal.
- 1.9. Frontier Pole at the rear of 855 I St in Williams (Location 36):
  - Has three bent pole steps.
  - Is missing high-vis strips.
- 1.10. Frontier Pole located at GPS coordinates 39° 9'8.64"N, 122° 9'51.33"W in Williams (Location 40) is missing high-vis strips.
- 1.11. Frontier Pole located at GPS coordinates 39° 9'8.72"N, 122° 9'53.81"W in Williams (Location 41) is missing high-vis strips.
- 1.12. Frontier Pole # CPN1568 at the rear of 110 6th St in Williams (Location 43) is missing high-vis strips.
- 1.13. Frontier Pole at 446 Sites Maxwell Rd in Maxwell (Location 58) is missing high-vis strips.
- 1.14. Frontier Pole # CPU733 at 260 Bismarck Ave in Maxwell (Location 60) is missing high-vis strips.
- 1.15. Frontier Pole located 1 Pole Northwest of Loc 86 in Colusa (Location 87) is leaning more than 10%.
- 1.16. Joint Pole at 943 Carson St in Colusa (Location 93) is missing high-vis strips.
- 1.17. Joint Pole located at GPS coordinates 39°12'4.15"N, 122° 0'12.07"W in Colusa (Location 102) is leaning more than 10%.
- 1.18. Joint Pole located at GPS coordinates 39°12'5.83"N, 122° 0'13.01"W in Colusa (Location 103) is leaning more than 10%.
- 1.19. Frontier's facilities need to be transferred to the new PG&E Pole at 380 Balsdon St in Grimes (Location 113).
- 1.20. Frontier Pole at Grimes-Arbuckle Rd and 6th St in Grimes (Location 114) is missing a high-vis strip.
- 1.21. Frontier's facilities need to be transferred to the new PG&E Pole at GPS coordinates 39.0566, -121.96 in Grimes (Location 119). Frontier has a preexisting Ticket #2162171 to transfer its facilities.
- 1.22. Frontier Pole # CTC1011980 at 4833 Ensley Rd in Knights Landing (Location 129) has a split pole top reinforced with a zip-tie. The pole requires a proper metal brace as reinforcement.

**2. 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.”*

- 2.1. Frontier Pole located at GPS coordinates 39°13'0.88"N, 122° 1'31.14"W in Colusa (Location 3) has a slack down guy.
- 2.2. Joint Pole # CPN1072 at 808 Hall St in Arbuckle (Location 25) has a slack down guy. Frontier has a preexisting Ticket # 3221471 to repair the guy.
- 2.3. Frontier Pole # CPN1493 located at GPS coordinates 39° 9'8.72"N,122° 9'54.73"W in Williams (Location 42) has a broken down guy.
- 2.4. Frontier Pole # CPU732 at 265 Bismark Ave in Maxwell (Location 63) has a slack down guy. Frontier has a preexisting Ticket # 3028455 to adjust the guy.
- 2.5. Joint Pole at 6999 Norman Rd in Princeton (Location 76) has a broken down guy. Frontier has a preexisting Ticket #3239656 to replace the guy.
- 2.6. Joint Pole located at GPS coordinates 39°24'39.78"N, 122° 0'39.49"W in Princeton (Location 78) has a slack down guy. Frontier has a preexisting Ticket #3025358 to adjust the guy.

**3. 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.”*

- 3.1. There are abandoned Frontier lines hanging down Joint Pole # CPN1210 at 1718 Lurline Avenue in Colusa (Location 4).
- 3.2. There were abandoned Frontier lines hanging down the Frontier Pole located at GPS coordinates 39.0039, -122.007 in Arbuckle (Location 17). Frontier removed the lines during the audit.
- 3.3. There is an abandoned Frontier line hanging down the Frontier Pole at 9th St and Main St in College City (Location 18).
- 3.4. There is an abandoned Frontier line on the ground at Frontier Pole # FTR702057 at GPS coordinates 39° 0'15.65"N, 122° 0'23.07"W in College City (Location 19).
- 3.5. There is an abandoned Frontier line hanging down the Joint Pole, PG&E # 120955761, located at GPS coordinates 39° 0'16.78"N, 122° 0'22.86"W in College City (Location 20).
- 3.6. There is an abandoned Frontier line at the Joint Pole at 7th St and Hall St in Arbuckle (Location 27).
- 3.7. There is an idle Frontier line on the ground at Frontier Pole # CPU912 at the rear of 885 I St in Williams (Location 34).
- 3.8. There is an abandoned Frontier line at the Frontier Pole at the rear of 855 I St in Williams (Location 36).
- 3.9. There is an abandoned Frontier line at the Joint Pole at 944 Zumwalt Rd in Williams (Location 37). Frontier has a preexisting Ticket # 3357241 to remove the line.
- 3.10. There is an abandoned Frontier line on the ground at Frontier Pole # CPN1568 at the rear of 110 6th St in Williams (Location 43). Frontier has a preexisting Ticket # 3221476 to remove the line.
- 3.11. There is an abandoned Frontier line midspan near the Joint Pole at the rear of 140 6th St in Williams (Location 46).

- 3.12. There is an abandoned Frontier line at the Joint Pole at the rear of 140 6th St in Williams (Location 47).
- 3.13. There is an abandoned Frontier line hanging down the Joint Pole at 5533 1st St in Delevan (Location 68).
- 3.14. There is an abandoned Frontier line at the Joint SmartMeter Pole at 7049 Norman Rd in Princeton (Location 73).
- 3.15. There is an abandoned Frontier line at the Joint Transformer Pole at 7049 Norman Rd in Princeton (Location 74).
- 3.16. There is an abandoned Frontier line at the Joint Pole located at GPS coordinates 39.0714, -121.898 in Grimes (Location 115). Frontier has a preexisting Ticket #3257508 to remove the line.
- 3.17. There is an abandoned and leaning Frontier Pole at GPS coordinates 38.7932, -121.768 in Knights Landing (Location 135).

**4. 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 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). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule.”*

- 4.1. There is vegetation strain on Frontier service drops near the Frontier Pole across from 7006 Fruitvale Ave in Colusa (Location 5).
- 4.2. There is vegetation strain on a Frontier line near the Frontier Pole located at GPS coordinates 39.0039, -122.007 in Arbuckle (Location 17).
- 4.3. There is vegetation strain/abrasion on a Frontier line near the Frontier Pole at the rear of 873 I St in Williams (Location 35).
- 4.4. There is vegetation strain/abrasion on a Frontier line at the Joint Pole at the rear of 140 6th St in Williams (Location 45).
- 4.5. There is vegetation strain on a Frontier line near Joint Pole # CPU489 at 454 Sites Maxwell Rd in Maxwell (Location 57).
- 4.6. There is vegetation strain/abrasion on a Frontier line at Frontier Pole # CPU734 at 270 Bismark Ave in Maxwell (Location 62).
- 4.7. There is vegetation causing strain/abrasion on a Frontier line at the Frontier Pole at 155 HWY 45 in Princeton (Location 82).

- 4.8. There is vegetation on a Frontier line causing it to be low at the Frontier Pole at GPS coordinates 39.2427, -121.954 in Colusa (Location 86).
- 4.9. There is vegetation abrasion on a Frontier line causing a broken lashing wire near the Joint Pole at GPS coordinates 39°12'35.22"N, 122° 1'0.81"W in Colusa (Location 89).

**5. GO 95, Rule 86.9, Guy Marker (Guy Guard) states:**

*“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.”*

- 5.1. Joint Pole, PG&E # 121444141, located at GPS coordinates 38°56'38.71"N, 122° 5'35.02"W in Arbuckle (Location 11) has a broken guy guard.
- 5.2. Joint Pole at the rear of 140 6th St in Williams (Location 47) is missing a guy guard.
- 5.3. Frontier Pole # CPU735 at 260 Bismark Ave in Maxwell (Location 59) is missing a guy guard.
- 5.4. Frontier Pole # CPU732 at 265 Bismark Ave in Maxwell (Location 63) is missing a guy guard.
- 5.5. Frontier Pole at 7047 Norman Rd Unit 5 in Princeton (Location 70) is missing a guy guard.

**6. GO 95, Rule 44.3 Replacement states:**

*“Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades “A” and “B” construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade “C” construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade “C” construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one.”*

- 6.1. Frontier Pole located at GPS coordinates 39.0039, -122.007 in Arbuckle (Location 17) is decayed. Frontier has a preexisting Ticket # 3374228 to replace the pole.
- 6.2. Frontier Pole located at GPS coordinates 39° 9'8.64"N, 122° 9'51.33"W in Williams (Location 40) is decayed and damaged.
- 6.3. Frontier Pole located at GPS coordinates 39° 9'8.72"N, 122° 9'53.81"W in Williams (Location 41) is decayed and damaged.
- 6.4. Joint Pole at the rear of 140 6th St in Williams (Location 46) is decayed, damaged, and missing a chunk near the top of the pole.
- 6.5. Frontier Pole at B St and 6th St in Williams (Location 48) is deteriorated and rotted at its base. Frontier has a preexisting Ticket # 3221480 to replace the pole.
- 6.6. Frontier Pole at B St and 5th St in Williams (Location 52) is rotted and missing a chunk at its base.
- 6.7. Frontier Pole at 7051 Norman Rd in Princeton (Location 72) is deteriorated and has a significant crack at the pole top.

- 6.8. Joint Pole at Fremont St and 10th St in Colusa (Location 90) is missing a chunk. Frontier has a preexisting Ticket #2773848 to repair the pole.
- 6.9. Frontier Pole at 759 Sioc St in Colusa (Location 94) is damaged and decayed. Frontier has a preexisting Ticket #3218253 to replace the pole.
- 6.10. Frontier Pole # FTR702626 located at GPS coordinates 39°12'2.55"N, 122° 0'11.16"W in Colusa (Location 101) is decayed and cracked. Frontier has a preexisting Ticket #3357243 to replace the pole.

**7. GO 95, Rule 84.7-A, Climbing Space** states in part:

*“The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–A5.”*

- 7.1. The climbing space is obstructed at Frontier Pole # FTR702057 at GPS coordinates 39° 0'15.65"N, 122° 0'23.07"W in College City (Location 19).
- 7.2. The climbing space is obstructed at the Joint Pole at 1000 Nicolaus Dr in Williams (Location 38). Frontier has a preexisting Ticket # 3251668 to trim the tree.
- 7.3. The climbing space is obstructed at Frontier Pole # CPU488 at 512 Sites Maxwell Rd in Maxwell (Location 56).
- 7.4. The climbing space is obstructed at the Joint Pole located at GPS coordinates 39.4015, -122.01 in Princeton (Location 81). Frontier has a preexisting Ticket #3343370 to trim the tree.
- 7.5. The climbing space is obstructed at the Frontier Pole located 1 Pole Northwest of Loc 86 in Colusa (Location 87).

**8. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1 Case 6 Column B** states:

*“The minimum required vertical clearance of communication conductors above walkable surfaces on buildings is 8 feet.”*

The clearance is low between the Frontier service drop and building near Frontier Pole # FTR702051 located at GPS coordinates 39.0189, -122.055 in Arbuckle (Location 22).

**9. GO 95, Rule 91.3-C, Stepping** states in part:

*“Where installed, the lowest step shall not be 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.”*

- 9.1. Joint Pole at 927 9th St in Williams (Location 33) is missing three steps.
- 9.2. Joint Pole at 1000 Nicolaus Dr in Williams (Location 38) has a low step.
- 9.3. Joint Pole located at GPS coordinates 39°12'5.83"N, 122° 0'13.01"W in Colusa (Location 103) has a low step.
- 9.4. Frontier Pole at Grimes-Arbuckle Rd and 6th St in Grimes (Location 114) has a low step.

**10. 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.*

*Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8).”*

Frontier Pole # CPU912 at the rear of 885 I St in Williams (Location 34) has an exposed ground wire and broken ground molding.

**11. GO 95, Rule 87.9-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground** states:

*“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.”*

Joint Pole at 667 A St in Williams (Location 44) has two risers that are not properly secured to the pole.

**12. GO 128, Rule 32.7, Covers** states in part:

*“Manholes, handholes, and subsurface equipment enclosures 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 arrangements shall be such that a tool or appliance shall be required for their opening and cover removal. (Also see Rule 17.8, and Appendix B, Figs. 9 and 17.)”*

12.1. Pedestal at B St and 6th St in Williams (Location 50) has a loose cover that is too small for the cables inside.

12.2. Pedestal located at GPS coordinates 39°21'25.05"N, 122°11'18.94"W in Delevan (Location 67) had a cover that was not properly closed. Frontier properly closed the pedestal during the audit.

12.3. Pedestal located at GPS coordinates 39° 7'22.60"N, 121°57'39.51"W in Meridian (Location 109) is missing a cover. Frontier has a preexisting Ticket #3331144 to install a cover.

- 12.4. Pedestal located at GPS coordinates 39° 3'23.88"N, 121°57'35.56"W in Grimes (Location 120) was open. Frontier installed the cover during the audit.
- 12.5. Pedestal located at GPS coordinates 38.8908, -121.728 in Robbins (Location 123) has an oversized cover that is zip-tied on. Frontier Ticket #1395764 shows that repairs were completed at this pedestal; however, an oversized cover attached with zip-ties is not a proper repair.
- 12.6. Pedestal located at GPS coordinates 38.7932, -121.768 in Knights Landing (Location 136) was missing a cover. Frontier installed the cover during the audit.
- 12.7. Pedestal located at GPS coordinates 38°47'35.53"N, 121°46'22.14"W in Knights Landing (Location 137) is missing a cover. Frontier has a preexisting Ticket #1378327 to install a cover.

**13. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 5 Column B** states in part:

*“The basic minimum allowable vertical clearance of a communication conductor and supply service drop in an above ground area accessible to pedestrians only is 10 feet.”*

***Exception (Rule 84.4-A(3)) Accessible to Pedestrians Only:** 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.*

- 13.1. Frontier Pole located at GPS coordinates 39°21'25.05"N, 122°11'18.94"W in Delevan (Location 66) has a low service drop approximately 3 feet from the ground.
- 13.2. Frontier Pole located at GPS coordinates 39.1953, -122.06 in Colusa (Location 88) has a low line. Frontier has a preexisting Ticket # 2529643 to raise the line.

**14. 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.”*

Pedestal located at GPS coordinates 39° 3'23.79"N, 121°57'35.91"W in Grimes (Location 122) has a faded ownership sign.

**15. GO 128, Rule 43.3-C, Depths** states in part:

*“Communication cables shall be installed at a minimum depth below the surface under which they are located as follows except as provided in Rule 43.3-D:*

*(1) Sidewalks, Parkways and Private Property: 12 inches”*

There is a Frontier underground cable on the ground going from the Pedestal at GPS coordinates 38.8803, -121.746 (Location 124) to the Pedestal at GPS coordinates 38°52'48.99"N, 121°44'43.13"W (Location 126). Frontier Ticket #1395293 states that the work to underground this cable was completed; however, ESRB staff observed the cable lying on the ground.

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

Pedestal located at GPS coordinates 38°47'35.53"N, 121°46'22.14"W in Knights Landing (Location 137) has damaged wiring. Frontier has a preexisting Ticket #1378327 to repair the wiring.

**V. Observations**

ESRB staff observed the following third-party potential safety concerns during the field inspection:

**GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities** states in part:

*“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property...”*

**GO 95, Rule 18A, 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 GO95.*

*Note: Each pole owner must be able to determine all other pole owners on poles it owns. Each pole owner must be able to determine all authorized entities that attach equipment on its portion of a pole.”*

- 1.1. Joint Pole # CPN1210 at 1718 Lurline Avenue in Colusa (Location 4) has a Race fiber line with broken lashing wire.
- 1.2. Cable TV facilities need to be transferred to the new Joint Pole at GPS coordinates 39.217, -122.014 in Colusa (Location 7).
- 1.3. Joint Pole at the rear of 140 6th St in Williams (Location 47) has a loose PG&E secondary insulator.
- 1.4. SmartMeter Pole at 5169 Maxwell Sites Rd in Maxwell (Location 54) has an exposed ground rod.
- 1.5. PG&E Pole at 7049 Norman Rd in Princeton (Location 75) has a loose bird diverter.
- 1.6. PG&E Pole #121703362 located at GPS coordinates 39°21'42.74"N, 121°59'53.39"W in Colusa (Location 84) is leaning more than 10%. Frontier has a preexisting Third-Party Ticket #3343372.
- 1.7. PG&E Pole #121142843 at 1750 Wescott Rd in Colusa (Location 97) is decayed and deteriorated.
- 1.8. Joint Pole at 1734 Wescott Rd in Colusa (Location 99) has a Cable TV service riser that is loose and missing a cover.
- 1.9. Joint Pole located at GPS coordinates 39°12'7.45"N, 122° 0'13.88"W in Colusa (Location 104) has a broken Cable TV lashing wire at midspan.
- 1.10. PG&E Pole #121142829 at 257 Florimond Dr in Colusa (Location 105) is hollow at its base and significantly deteriorated.
- 1.11. Race Pole #RC013563 is contacting the span guy and Cable TV line on PG&E Pole #121142832 at 210 Florimond Dr in Colusa (Location 108).
- 1.12. Joint Pole located at GPS coordinates 39.0714, -121.898 in Grimes (Location 115) has a split/broken PG&E secondary crossarm and loose PG&E secondary insulator.
- 1.13. Joint Pole located at GPS coordinates 38.7994, -121.721 in Knights Landing (Location 131) has a slack PG&E down guy that is contacting communication span guys and lines.
- 1.14. PG&E Pole #120383905 at Locust St and 6th St in Knights Landing (Location 132) is missing chunks due to vehicles hitting it.