

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 11, 2022

CA2022-936

Charlie Born  
Director – Government & External Affairs  
Frontier Communications  
2535 West Hillcrest Drive  
Newbury, CA 91320

**SUBJECT:** Audit of Frontier’s Ontario Region

Mr. Born:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Mily Vaidya of my staff conducted a Communication Infrastructure Provider (CIP) audit of Frontier’s Ontario Region from October 24, 2022 to October 28, 2022. 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 December 14, 2022 by electronic or hard copy, of all corrective measures taken by Frontier to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Mily Vaidya at (213) 999-8528 or [Mily.Vaidya@cpuc.ca.gov](mailto:Mily.Vaidya@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: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC  
Derek Fong, Senior Utilities Engineer, Electric Safety and Reliability Branch, CPUC  
Mily Vaidya, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

## **AUDIT FINDINGS**

### **I. Records Review**

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records
- Completed and pending corrective action work orders
- Pole loading calculations
- Frontier's Overhead Lines Maintenance Plan
- Frontier's Visual Inspections of Overhead Lines

## II. Field Inspection

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

No.	Structure Number	Type of Structure	City
1	1411743E	Pole	Ontario
2	Pole Box 1/ 5232 E. Airport Dr.	Handhole	Ontario
3	In front of 5351 E. Airport Dr	Manhole	Ontario
4	4329335	Pole	Ontario
5	Next to pole 4329335	Manhole	Ontario
6	1411745E	Pole	Ontario
7	GT83110	Pole	Ontario
8	H5549Y	Pole	Ontario
9	5200 E. Airport Dr.	Handhole	Ontario
10	GT64676	Pole	Ontario
11	GT89259	Pole	Ontario
12	Next to street light 12336	Pole	Ontario
13	In front of 5180 E. Airport Dr.	Pole	Ontario
14	H7283Y	Pole	Ontario
15	GT133214	Pole	Ontario
16	In front of SubZero motor sport	Pole	Ontario
17	4290087E	Pole	Ontario
18	4290088E	Pole	Ontario
19	1240100E	Pole	Ontario
20	4018485E	Pole	Ontario
21	1240099E	Pole	Ontario
22	1354273E	Pole	Ontario
23	4238145E	Pole	Ontario
24	4412375E	Pole	Ontario
25	4238147E	Pole	Ontario
26	4238148E	Pole	Ontario
27	863481E	Pole	Ontario
28	905616E	Pole	Ontario
29	905615E	Pole	Ontario
30	4909175E	Pole	Ontario
31	2067377E	Pole	Ontario
32	4585918E	Pole	Ontario
33	H30435Y	Pole	Ontario
34	4965354E	Pole	Ontario
35	4903075E	Pole	Ontario

<b>No.</b>	<b>Structure Number</b>	<b>Type of Structure</b>	<b>City</b>
36	GT101145	Pole	Ontario
37	GT100870	Pole	Ontario
38	GT100871	Pole	Ontario
39	GT100872	Handhole	Ontario
40	In front of 1642 Sacramento Ave	Pole	Ontario
41	4019062E	Pole	Ontario
42	H30167Y	Pole	Ontario
43	H30166Y	Pole	Ontario
44	H16424Y	Pole	Ontario
45	H16423Y	Pole	Ontario
46	GT101123	Pole	Ontario
47	H8398Y	Pole	Ontario
48	4802007E	Pole	Ontario
49	H8387Y	Pole	Ontario
50	4852043E	Pole	Ontario
51	4061147E	Pole	Ontario
52	1998495E	Pole	Ontario
53	1998496E	Pole	Ontario
54	1998497E	Pole	Ontario
55	1998498E	Pole	Ontario
56	GT124242	Pole	Ontario
57	In front of 416 E Carlton St.	Pole	Ontario
58	4658235E	Pole	Ontario
59	GT59618	Pole	Ontario
60	4668538E	Pole	Ontario
61	4802009E	Pole	Ontario
62	4908228E	Pole	Ontario
63	4908227E	Pole	Ontario
64	H2976Y	Pole	Ontario
65	627864E	Pole	Ontario
66	4386655E	Pole	Ontario
67	GT45716	Pole	Ontario
68	4534001E	Pole	Ontario
69	4282954E	Pole	Ontario
70	4531256E	Pole	Ontario
71	4631333E	Pole	Ontario
72	7378222E	Pole	Ontario
73	447404E	Pole	Ontario
74	4516122E	Pole	Ontario

<b>No.</b>	<b>Structure Number</b>	<b>Type of Structure</b>	<b>City</b>
75	1071990E	Pole	Ontario
76	416396E	Pole	Ontario
77	416397E	Pole	Ontario
78	4341565E	Pole	Ontario
79	1125414E	Pole	Ontario
80	1125413E	Pole	Ontario
81	1125412E	Pole	Ontario
82	1125411E	Pole	Ontario
83	1125415E	Pole	Ontario
84	1483537E	Pole	Ontario
85	4779829E	Pole	Ontario
86	1714529E	Pole	Ontario
87	1483535E	Pole	Ontario
88	4568995E	Pole	Ontario
89	1109A	Manhole	Ontario
90	4580719E	Pole	Ontario
91	T836610	Handhole	Ontario
92	2567	Handhole	Ontario
93	T836611	Handhole	Ontario
94	T836612	Handhole	Ontario
95	T836613	Handhole	Ontario
96	T836621	Handhole	Ontario
97	H3023	Padmount	Ontario
98	177044	Handhole	Ontario
99	177051	Handhole	Ontario
100	177057	Handhole	Ontario
101	177063	Handhole	Ontario
102	177068	Handhole	Ontario
103	177078	Handhole	Ontario
104	177181	Handhole	Ontario
105	177206	Handhole	Ontario
106	7582A	Handhole	Ontario
107	7603A	Handhole	Ontario
108	7602A	Handhole	Ontario
109	7059A	Handhole	Ontario
110	7057A	Handhole	Ontario
111	178405	Handhole	Ontario
112	178633	Handhole	Ontario

<b>No.</b>	<b>Structure Number</b>	<b>Type of Structure</b>	<b>City</b>
113	178636	Handhole	Ontario
114	178629	Handhole	Ontario
115	178640	Handhole	Ontario
116	178155	Handhole	Ontario
117	13927	Handhole	Ontario
118	178635	Handhole	Ontario
119	178631	Handhole	Ontario
120	13926	Handhole	Ontario

### III. Field Inspection – Violations List

My staff observed the following violations during the field inspections portion of the audit:

**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.*

The eye of the Frontier down guy anchor supporting Pole 416396E was buried in the dirt.

The Frontier pole transfer at each of the following poles was incomplete:

- 4568995E
- 4580719E
- GT45716

The Frontier lashing wire at each of the following poles was damaged:

- GT83110
- GT64676
- GT89259
- Located in front of 5180 E Airport Dr.
- GT133214
- Located in front of SubZero Motor Sport
- 4238145E
- 4238148E
- 2067377E
- H30435Y
- 4965354E
- H8387Y
- 4852043E
- 416397E

The Frontier pole step at each of the following poles was not properly attached:

- 4329335
- H30167Y
- 447404E
- 1483537E

**GO 95, Rule 56.2, Uses (Guy Wires)**, 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 Frontier down guy wire attached to the pole located next to streetlight 12336 was not taut.

**General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19, Column C**, requires the minimum radial separation between communication cables and guy wires to be 3 inches.

The radial separation between Frontier communications conductors and a third-party communications guy wire on pole 1400745E was less than 3 inches.

**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).*

Frontier communications conductors attached to following poles were strained by vegetation:

- GT101123
- 4802007E
- H8387Y

**GO 95, 31.6, Abandoned Lines**, states in part:

*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.*

Frontier communications conductors on each of the following poles were abandoned:

- GT83110
- GT89259
- In front of SubZero Motor Sport
- 4903075E
- GT101145
- 4908228E



- 1125414E
- 1125413E
- 4779829E

**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.*

The ground moulding attached to Pole 416396E was damaged.

**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.*

The Frontier vault lid at each of the following handholes was damaged:

- Located in front of 1642 Sacramento Ave.
- 177051
- 177057
- 177078
- 177181 (Bolt missing)
- 13926
- 178636
- Located in front of 5351 E Airport Dr
- Next to pole 4329335