



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

SENT VIA ELECTRONIC MAIL

September 3, 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' Santa Barbara County Area

Dear Fadi Daye,

Frontier California Inc. (U-1002-C) ("Frontier") hereby responds to the August 9, 2024 California Public Utilities Commission (Commission) report regarding the Santa Barbara County Area communications infrastructure provider audit conducted from July 8, 2024 to July 12, 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 11 repair work orders past Frontier's scheduled completion dates. Additionally, at the time of the audit, there were 142 open repair work orders that were past their scheduled completion dates.

Response: Frontier is prioritizing the 142 open repair work orders for completion by 10/31/24.

III. Field Inspections

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:

- Pole No. GT218180 - the "eye" of the down guy anchor attached to the pole was buried.

Response: Workorders have been issued to correct audit findings. See attached "Frontier Audit Tickets CAPUC 2024 Santa Barbara County.xls".

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

- S27858Y
- S9303Y
- GT115284
- GT115282
- GT103381
- GT103616
- S26420Y

Response: Workorders have been issued to correct audit findings. See attached "Frontier Audit Tickets CAPUC 2024 Santa Barbara County.xls".

Frontier's facilities on the following poles required maintenance:

- Pole No. 1015386: Damaged Copper terminal box.
- Pole No. 1324174E: The copper terminal box was open and damaged.
- Pole No. 4551311E: Loose cable dangling from the copper terminal.

Response: Workorders have been issued to correct audit findings. See attached "Frontier Audit Tickets CAPUC 2024 Santa Barbara County.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:

- S29140Y
- 205064E
- 1015386E
- 1015391E
- 4733701E
- 1324563E
- 4340103E

Response: Workorders have been issued to correct audit findings. See attached "Frontier Audit Tickets CAPUC 2024 Santa Barbara County.xls".

GO 95, Rule 34, Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight 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.

- An unauthorized permanent "Resident Address No." sign was attached to Pole No. 1523869E.
- An unauthorized permanent "Private Road" sign was attached to Pole No. 4493954E.

Response: Workorders have been issued to correct audit findings. See attached "Frontier Audit Tickets CAPUC 2024 Santa Barbara County.xls".

GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground, states in part:

Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8.

The conduit protecting the Frontier riser attached to Pole S27858Y was damaged.

Response: Workorders have been issued to correct audit findings. See attached "Frontier Audit Tickets CAPUC 2024 Santa Barbara County.xls".

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 No. 4660254E was obstructed by vegetation.

Response: Workorders have been issued to correct audit findings. See attached “Frontier Audit Tickets CAPUC 2024 Santa Barbara County.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.

Permanent abandoned service drops were observed on or near each of the following poles:

- S29322Y
- S27964Y
- 4340104E
- 4551311E

Response: Workorders have been issued to correct audit findings. See attached “Frontier Audit Tickets CAPUC 2024 Santa Barbara County.xls”.

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 “Vault” lid at 4615 El Carro Ln, Carpinteria was corroded and broken.
- The “Manhole” at 4625 El Carro Ln, Carpinteria was flooded and under water.

Response: Workorders have been issued to correct audit findings. See attached “Frontier Audit Tickets CAPUC 2024 Santa Barbara County.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 cover on each of the following manholes and handholes was not securely closed:

- The “Hand-hole” at 5875 Calle Real, Goleta was not securely closed, and the chamber is full of dirt.
- The “Hand-hole” at 1482 Anita St., Carpinteria, not securely closed, and buried under dirt.

Response: Workorders have been issued to correct audit findings. See attached “Frontier Audit Tickets CAPUC 2024 Santa Barbara County.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
Sultan Tipu, Utilities Engineer, ESRB, SED, CPUC

Frontier Audit Tickets CAPUC 2024 Santa Barbara County

CPUC No	City	Found Pole	Ticket ID	Status	Pole
2	Carpinteria	S29322Y	TK3535821	NEW	CRPRCAXF S29322Y
4	Carpinteria	4660254E	TK3535831	NEW	CRPRCAXF 4660254E
6	Carpinteria	S27964Y	TK3535833	NEW	CRPRCAXF S27964Y
11	Carpinteria	S29140Y	TK3535834	NEW	CRPRCAXF S29140Y
15	Carpinteria	205064E	TK3535835	NEW	CRPRCAXF 205064E
115	Carpinteria		TK3535840	NEW	4615 Aragon Dr
108	Carpinteria		TK3535841	NEW	4625 El Carro Ln
120	Carpinteria		TK3535842	NEW	1482 Anita St
99	Montecito	4493954E	TK3535856	NEW	CRPRCAXF 4493954E
23	Santa Barbara	1015391E	TK3535947	NEW	SNBBCAXF 1015391E
71	Montecito	GT218180	TK3535949	NEW	MNTTCAXF GT218180
21	Santa Barbara	1015386E	TK3536092	NEW	SNBBCAXF 1015386E
72	Montecito	4340103E	TK3535950	NEW	MNTTCAXF 43401035E
28	Santa Barbara	S27858Y	TK3536093	NEW	SNBBCAXF S27858Y
29	Santa Barbara	S9303Y	TK3536095	NEW	SNBBCAXF S9303Y
31	Santa Barbara	4551311E	TK3536096	NEW	SNBBCAXF 4551311E
34	Santa Barbara	1324174E	TK3536097	NEW	SNBBCAXF 1324174E
76	Montecito	4340104E	TK3535951	NEW	MNTTCAXF 4340104E
78	Montecito	S26420Y	TK3536081	NEW	MNTTCAXF S26420Y
50	Ellwood	1324563E	TK3536104	NEW	ELWDCAXF 1324563E
49	Ellwood	4733701E	TK3536215	NEW	ELWDCAXF 4733701E
44	Ellwood	1523869E	TK3536216	NEW	ELWDCAXF 1523869E
54	Gaviota	GT103381	TK3536217	NEW	GVTACAXA GT103381
53	Gaviota	GT115282	TK3536218	NEW	GVTACAXA GT115282
52	Gaviota	GT115284	TK3536219	NEW	GVTACAXA GT115284
102	Goleta		TK3536220	NEW	5875 Calle Real
103	Goleta		TK3536221	NEW	5875 Calle Real

Type
Pole
Pole
Pole
Pole
Pole
Pedestal
Manhole 154A
Handhole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Pole
Handhole 17
Handhole 19

Violation Description
Permanent abandoned service drops were observed on or near each of the following poles
The climbing space on Pole was obstructed by vegetation
Permanent abandoned service drops were observed on or near each of the following poles
A Frontier communication conductor attached is being strained by vegetation
A Frontier communication conductor attached is being strained by vegetation
Vault Lid corroded and broken
Manhole was flooded and under water.
Hand Hole not securely closed, and buried under dirt.
An unauthorized permanent "Private Road" sign is attached to Pole
A Frontier communication conductor attached is being strained by vegetation
the "eye" of the down guy anchor attached to the pole was buried
Damaged Copper terminal box, A Frontier communication conductor attached is being strained by vegetation
A Frontier communication conductor attached is being strained by vegetation
Missing or damaged pole number tags were observed, The conduit protecting the Frontier riser attached to Pole
Missing or damaged pole number tags were observed
Loose cable dangling from the copper terminal, Permanent abandoned service drops were observed on or near
The copper terminal box was open and damaged.
Permanent abandoned service drops were observed on or near each of the following poles
Missing or damaged pole number tags were observed
A Frontier communication conductor attached is being strained by vegetation
A Frontier communication conductor attached is being strained by vegetation
An unauthorized permanent "Resident Address No." sign is attached to Pole
Missing or damaged pole number tags were observed
Missing or damaged pole number tags were observed
Missing or damaged pole number tags were observed
Hand Hole not securely closed, and the chamber is full of dirt.
Hand Hole not securely closed, and the chamber is full of dirt.

ole S27858Y was damaged

ar each of the following poles

No.	Facility Identification	Address	Facility Type	Location
95		14839	Pole	Montecito
81		4476398	Pole	Montecito
22	1015385E		Pole	Santa Barbara
21	1015386E		Pole	Santa Barbara
23	1015391E		Pole	Santa Barbara
74	1015828E		Pole	Montecito
83	1016513E		Pole	Montecito
84	107628E		Pole	Montecito
9	1189239E		Pole	Carpinteria
68	1323119E		Pole	Goleta
87	1324119E		Pole	Goleta
34	1324174E		Pole	Santa Barbara
50	1324563E		Pole	Ellwood
48	1324565E		Pole	Ellwood
24	1372074E		Pole	Santa Barbara
86	1481731E		Pole	Goleta
64	1481874E		Pole	Goleta
63	1481875E		Pole	Goleta
62	1481876E		Pole	Goleta
61	1481877E		Pole	Goleta
41	1523866E		Pole	Ellwood
42	1523867E		Pole	Ellwood
43	1523868E		Pole	Ellwood
44	1523869E		Pole	Ellwood
45	1523870E		Pole	Ellwood
46	1523871E		Pole	Ellwood
93	1524073E		Pole	Santa Barbara
40	1524198E		Pole	Santa Barbara
39	1524199E		Pole	Santa Barbara
35	1524719E		Pole	Santa Barbara
91	1828718E		Pole	Santa Barbara
90	1828719E		Pole	Santa Barbara
88	1828720E		Pole	Santa Barbara
82	1828903E		Pole	Montecito
66	184859E		Pole	Goleta
75	1868549E		Pole	Montecito
15	205064E		Pole	Carpinteria
1	207295E		Pole	Carpinteria
16	2143989E		Pole	Carpinteria
30	2244742E		Pole	Santa Barbara
20	2244781E		Pole	Carpinteria
37	2320658E		Pole	Santa Barbara
36	2320659E		Pole	Santa Barbara
19	4130512E		Pole	Carpinteria
72	4340103E		Pole	Montecito
76	4340104E		Pole	Montecito

80 4340109E	Pole	Montecito
73 4371165E	Pole	Montecito
65 4403794E	Pole	Goleta
47 4421967E	Pole	Ellwood
99 4493954E	Pole	Montecito
97 4493955E	Pole	Montecito
33 4499508E	Pole	Santa Barbara
12 4538874E	Pole	Carpinteria
31 4551311E	Pole	Santa Barbara
67 455264E	Pole	Goleta
4 4660254E	Pole	Carpinteria
49 4733701E	Pole	Ellwood
89 4753047E	Pole	Santa Barbara
27 4830341E	Pole	Santa Barbara
100 4869169E	Pole	Montecito
18 4890145E	Pole	Carpinteria
8 4890880E	Pole	Carpinteria
32 4919037E	Pole	Santa Barbara
98 4955666E	Pole	Montecito
60 FTR115759	Pole	Gaviota
58 FTR5745	Pole	Gaviota
54 GT103381	Pole	Gaviota
59 GT103616	Pole	Gaviota
55 GT115281	Pole	Gaviota
53 GT115282	Pole	Gaviota
52 GT115284	Pole	Gaviota
25 GT116335	Pole	Santa Barbara
51 GT123535	Pole	Gaviota
56 GT132464	Pole	Gaviota
57 GT132465	Pole	Gaviota
96 GT13463	Pole	Montecito
17 GT137054E	Pole	Carpinteria
71 GT218180	Pole	Montecito
92 GT23870	Pole	Santa Barbara
85 GT82939	Pole	Goleta
77 GT99463	Pole	Montecito
79 S13749Y	Pole	Montecito
3 S17171Y	Pole	Carpinteria
78 S26420Y	Pole	Montecito
28 S27858Y	Pole	Santa Barbara
26 S27861Y	Pole	Santa Barbara
6 S27964Y	Pole	Carpinteria
13 S29136Y	Pole	Carpinteria
14 S29137Y	Pole	Carpinteria
11 S29140Y	Pole	Carpinteria
10 S29141Y	Pole	Carpinteria
2 S29322Y	Pole	Carpinteria

5 S29323Y		Pole	Carpinteria
7 S29324Y		Pole	Carpinteria
29 S9303Y		Pole	Santa Barbara
38 T8617-504		Pole	Santa Barbara
94 VZ106223		Pole	Montecito
70 VZ106441		Pole	Goleta
69 VZ10654		Pole	Goleta
110	1426 Begonia Dr	Flowerpot	Carpinteria
112	1435 Begonia Dr	Flowerpot	Carpinteria
111	1436 Begonia Dr	Handhole	Carpinteria
113	1456 Begonia Dr	Flowerpot	Carpinteria
117	1474 Anita St	Pull box	Carpinteria
118	1475 Anita St	Handhole	Carpinteria
119	1478 Anita St	Handhole	Carpinteria
120	1482 Anita St	Handhole	Carpinteria
104	4515 El Carro Ln	Manhole	Carpinteria
107	4515 El Carro Ln	Vault	Carpinteria
106	4516 El Carro Ln	Manhole	Carpinteria
105	4535 El Carro Ln	Manhole	Carpinteria
115	4615 Aragon Dr	Pedestal	Carpinteria
108	4625 El Carro Ln	Manhole	Carpinteria
109	4655 El Carro Ln	Manhole	Carpinteria
114	4725 El Carro Ln	Pedestal	Carpinteria
116	4725 El Carro Ln	Manhole	Carpinteria
101	5875 Calle Real	Hand hole	Goleta
102	5875 Calle Real	Handhole 17	Goleta
103	5875 Calle Real	Handhole 19	Goleta

Damaged Copper terminal box, A Frontier communication conductor attached is being strained by vegetation
A Frontier communication conductor attached is being strained by vegetation

The copper terminal box was open and damaged.
A Frontier communication conductor attached is being strained by vegetation

An unauthorized permanent "Resident Address No." sign is attached to Pole

A Frontier communication conductor attached is being strained by vegetation

A Frontier communication conductor attached is being strained by vegetation
Permanent abandoned service drops were observed on or near each of the following poles

An unauthorized permanent "Private Road" sign is attached to Pole

Loose cable dangling from the copper terminal, Permanent abandoned service drops were observed on or near

The climbing space on Pole was obstructed by vegetation

A Frontier communication conductor attached is being strained by vegetation

Missing or damaged pole number tags were observed

Missing or damaged pole number tags were observed

Missing or damaged pole number tags were observed

the "eye" of the down guy anchor attached to the pole was buried

Missing or damaged pole number tags were observed

Missing or damaged pole number tags were observed, The conduit protecting the Frontier riser attached to Pole

Permanent abandoned service drops were observed on or near each of the following poles

A Frontier communication conductor attached is being strained by vegetation

Permanent abandoned service drops were observed on or near each of the following poles

Missing or damaged pole number tags were observed

Hand Hole not securely closed, and buried under dirt.

Vault Lid corroded and broken
Manhole was flooded and under water.

Hand Hole not securely closed, and the chamber is full of dirt.
Hand Hole not securely closed, and the chamber is full of dirt.

No.	Facility	Facility	
1	207295E	Pole	
2	S29322Y	Pole	
3	S17171Y	Pole	
4	4660254E	Pole	
5	S29323Y	Pole	
6	S27964Y	Pole	
7	S29324Y	Pole	
8	4890880E	Pole	
9	1189239E	Pole	
10	S29141Y	Pole	
11	S29140Y	Pole	
12	4538874E	Pole	
13	S29136Y	Pole	
14	S29137Y	Pole	
15	205064E	Pole	
16	2143989E	Pole	
17	GT137054	Pole	
18	4890145E	Pole	
19	4130512E	Pole	
20	2244781E	Pole	
21	1015386E	Pole	
22	1015385E	Pole	
23	1015391E	Pole	
24	1372074E	Pole	
25	GT116335	Pole	
26	S27861Y	Pole	
27	4830341E	Pole	
28	S27858Y	Pole	
29	S9303Y	Pole	
30	2244742E	Pole	
31	4551311E	Pole	
32	4919037E	Pole	
33	4499508E	Pole	
34	1324174E	Pole	
35	1524719E	Pole	
36	2320659E	Pole	
37	2320658E	Pole	
38	T8617-	Pole	
39	1524199E	Pole	Santa
40	1524198E	Pole	Santa
41	1523866E	Pole	Ellwood
42	1523867E	Pole	Ellwood
43	1523868E	Pole	Ellwood
44	1523869E	Pole	Ellwood
45	1523870E	Pole	Ellwood
46	1523871E	Pole	Ellwood

47	4421967E	Pole	Ellwood
48	1324565E	Pole	Ellwood
49	4733701E	Pole	Ellwood
50	1324563E	Pole	Ellwood
51	GT123535	Pole	Gaviota
52	GT115284	Pole	Gaviota
53	GT115282	Pole	Gaviota
54	GT103381	Pole	Gaviota
55	GT115281	Pole	Gaviota
56	GT132464	Pole	Gaviota
57	GT132465	Pole	Gaviota
58	FTR5745	Pole	Gaviota
59	GT103616	Pole	Gaviota
60	FTR11575	Pole	Gaviota
61	1481877E	Pole	Goleta
62	1481876E	Pole	Goleta
63	1481875E	Pole	Goleta
64	1481874E	Pole	Goleta
65	4403794E	Pole	Goleta
66	184859E	Pole	Goleta
67	455264E	Pole	Goleta
68	1323119E	Pole	Goleta
69	VZ10654	Pole	Goleta
70	VZ106441	Pole	Goleta
71	GT218180	Pole	Montecito
72	4340103E	Pole	Montecito
73	4371165E	Pole	Montecito
74	1015828E	Pole	Montecito
75	1868549E	Pole	Montecito
76	4340104E	Pole	Montecito
77	GT99463	Pole	Montecito
78	S26420Y	Pole	Montecito
79	S13749Y	Pole	Montecito
80	4340109E	Pole	Montecito
81	4476398	Pole	Montecito
82	1828903E	Pole	
83	1016513E	Pole	
84	107628E	Pole	
85	GT82939	Pole	
86	1481731E	Pole	
87	1324119E	Pole	
88	1828720E	Pole	
89	4753047E	Pole	
90	1828719E	Pole	
91	1828718E	Pole	
92	GT23870	Pole	
93	1524073E	Pole	

94	VZ106223	Pole
95	14839	Pole
96	GT13463	Pole
97	4493955E	Pole
98	4955666E	Pole
99	4493954E	Pole
100	4869169E	Pole
101	5875 Calle Real	Hand hole
102	5875 Calle Real	Handhole 17
103	5875 Calle Real	Handhole 19
104	4515 El Carro Ln	Manhole
105	4535 El Carro Ln	Manhole
106	4516 El Carro Ln	Manhole 155A
107	4515 El Carro Ln	Vault
108	4625 El Carro Ln	Manhole 154A
109	4655 El Carro Ln	Manhole 186A
110	1426 Begonia Dr	Flowerpot
111	1436 Begonia Dr	Handhole
112	1435 Begonia Dr	Flowerpot
113	1456 Begonia Dr	Flowerpot
114	4725 El Carro Ln	Pedestal
115	4615 Aragon Dr	Pedestal
116	4725 El Carro Ln	Manhole 153A
117	1474 Anita St	Pull box
118	1475 Anita St	Handhole
119	1478 Anita St	Handhole
120	1482 Anita St	Handhole

Location

Carpinteri	1
Carpinteri	2
Carpinteri	3
Carpinteri	4
Carpinteri	5
Carpinteri	6
Carpinteri	7
Carpinteri	8
Carpinteri	9
Carpinteri	10
Carpinteri	11
Carpinteri	12
Carpinteri	13
Carpinteri	14
Carpinteri	15
Carpinteri	16
Carpinteri	17
Carpinteri	18
Carpinteri	19
Carpinteri	20
Santa	21
Santa	22
Santa	23
Santa	24
Santa	25
Santa	26
Santa	27
Santa	28
Santa	29
Santa	30
Santa	31
Santa	32
Santa	33
Santa	34
Santa	35
Santa	36
Santa	37
Santa	38
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	76
	77
	78
	79
	80
	81
Montecito	82
Montecito	83
Montecito	84
Goleta	85
Goleta	86
Goleta	87
Santa	88
Santa	89
Santa	90
Santa	91
Santa	92
Santa	93

Montecito	94
Montecito	95
Montecito	96
Montecito	97
Montecito	98
Montecito	99
Montecito	100
Goleta	101
Goleta	102
Goleta	103
Carpinteri	104
Carpinteri	105
Carpinteri	106
Carpinteri	107
Carpinteri	108
Carpinteri	109
Carpinteri	110
Carpinteri	111
Carpinteri	112
Carpinteri	113
Carpinteri	114
Carpinteri	115
Carpinteri	116
Carpinteri	117
Carpinteri	118
Carpinteri	119
Carpinteri	120