

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 9, 2024

CA2024-1196

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

Subject: Audit of Frontier Communications' Santa Barbara County Area

Ms. Geise:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Sultan Tipu of my staff conducted a communications infrastructure provider audit of Frontier Communications' Santa Barbara County Area from July 8 to July 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 September 9, 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 Sultan Tipu at (213) 660-5524 or Sultan.Tipu@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, CPU
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:

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.

III. Field Inspections

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

No.	Facility Identification	Facility Type	Location
1	207295E	Pole	Carpinteria
2	S29322Y	Pole	Carpinteria
3	S17171Y	Pole	Carpinteria
4	4660254E	Pole	Carpinteria
5	S29323Y	Pole	Carpinteria
6	S27964Y	Pole	Carpinteria
7	S29324Y	Pole	Carpinteria
8	4890880E	Pole	Carpinteria
9	1189239E	Pole	Carpinteria
10	S29141Y	Pole	Carpinteria
11	S29140Y	Pole	Carpinteria
12	4538874E	Pole	Carpinteria
13	S29136Y	Pole	Carpinteria
14	S29137Y	Pole	Carpinteria
15	205064E	Pole	Carpinteria
16	2143989E	Pole	Carpinteria
17	GT137054E	Pole	Carpinteria
18	4890145E	Pole	Carpinteria
19	4130512E	Pole	Carpinteria
20	2244781E	Pole	Carpinteria
21	1015386E	Pole	Santa Barbara
22	1015385E	Pole	Santa Barbara
23	1015391E	Pole	Santa Barbara
24	1372074E	Pole	Santa Barbara
25	GT116335	Pole	Santa Barbara
26	S27861Y	Pole	Santa Barbara
27	4830341E	Pole	Santa Barbara
28	S27858Y	Pole	Santa Barbara
29	S9303Y	Pole	Santa Barbara
30	2244742E	Pole	Santa Barbara
31	4551311E	Pole	Santa Barbara
32	4919037E	Pole	Santa Barbara
33	4499508E	Pole	Santa Barbara
34	1324174E	Pole	Santa Barbara
35	1524719E	Pole	Santa Barbara
36	2320659E	Pole	Santa Barbara
37	2320658E	Pole	Santa Barbara
38	T8617-504	Pole	Santa Barbara

39	1524199E	Pole	Santa Barbara
40	1524198E	Pole	Santa Barbara
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	FTR115759	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	Montecito
83	1016513E	Pole	Montecito
84	107628E	Pole	Montecito
85	GT82939	Pole	Goleta
86	1481731E	Pole	Goleta
87	1324119E	Pole	Goleta
88	1828720E	Pole	Santa Barbara CO
89	4753047E	Pole	Santa Barbara CO
90	1828719E	Pole	Santa Barbara CO
91	1828718E	Pole	Santa Barbara CO
92	GT23870	Pole	Santa Barbara CO
93	1524073E	Pole	Santa Barbara CO
94	VZ106223	Pole	Montecito
95	14839	Pole	Montecito
96	GT13463	Pole	Montecito
97	4493955E	Pole	Montecito
98	4955666E	Pole	Montecito
99	4493954E	Pole	Montecito
100	4869169E	Pole	Montecito
101	5875 Calle Real	Hand hole	Goleta
102	5875 Calle Real	Handhole 17	Goleta
103	5875 Calle Real	Handhole 19	Goleta
104	4515 El Carro Ln	Manhole	Carpinteria
105	4535 El Carro Ln	Manhole	Carpinteria
106	4516 El Carro Ln	Manhole 155A	Carpinteria
107	4515 El Carro Ln	Vault	Carpinteria
108	4625 El Carro Ln	Manhole 154A	Carpinteria
109	4655 El Carro Ln	Manhole 186A	Carpinteria
110	1426 Begonia Dr	Flowerpot	Carpinteria
111	1436 Begonia Dr	Handhole	Carpinteria
112	1435 Begonia Dr	Flowerpot	Carpinteria
113	1456 Begonia Dr	Flowerpot	Carpinteria
114	4725 El Carro Ln	Pedestal	Carpinteria
115	4615 Aragon Dr	Pedestal	Carpinteria
116	4725 El Carro Ln	Manhole 153A	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

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.

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

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

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.

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

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.

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.

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.

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

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.

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.