

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 10, 2024

CA2024-1219

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

Subject: Audit of Frontier Communications' LA County North 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' LA County North Area from September 23 to September 27, 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 November 11, 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 47 repair work orders past Frontier's scheduled completion dates. Additionally, at the time of the audit, there were 5 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	VZ99574	Pole	Lancaster Antelope
2	991722E	Pole	Lancaster Antelope
3	991721E	Pole	Lancaster Antelope
4	2007608	Pole	Lancaster Antelope
5	4630297	Pole	Lancaster Antelope
6	GT94311	Pole	Lancaster Antelope
7	1490712E	Pole	Lancaster Antelope
8	1491212E	Pole	Lancaster Antelope
9	1491211E	Pole	Lancaster Antelope
10	1491210E	Pole	Lancaster Antelope
11	4137407E	Pole	Lancaster
12	1490815E	Pole	Lancaster
13	1847222E	Pole	Lancaster
14	1490822E	Pole	Lancaster
15	1210663E	Pole	Lancaster
16	2100679E	Pole	Lancaster
17	1451195E	Pole	Lancaster
18	1451196E	Pole	Lancaster
19	1451197E	Pole	Lancaster
20	5245262E	Pole	Lancaster
21	1295167E	Pole	Lancaster
22	1295168E	Pole	Lancaster
23	1295169E	Pole	Lancaster
24	627165E	Pole	Lancaster
25	K6929	Pole	Lancaster
26	7363745E	Pole	Lancaster
27	825591E	Pole	Lancaster
28	1341706E	Pole	Lancaster
29	1559693E	Pole	Lancaster
30	538732E	Pole	Lancaster
31	1310383E	Pole	Lancaster
32	1987013E	Pole	Lancaster
33	682230E	Pole	Lancaster
34	682231E	Pole	Lancaster
35	1310384E	Pole	Lancaster
36	735632E	Pole	Lancaster
37	1491436E	Pole	Lancaster
38	1987014E	Pole	Lancaster

39	K9488Y	Pole	Lancaster
40	GT119931	Pole	Lancaster
41	955662E	Pole	Antelope Acres
42	1122598E	Pole	Antelope Acres
43	955661E	Pole	Antelope Acres
44	K11052Y	Pole	Antelope Acres
45	K2195Y	Pole	Antelope Acres
46	K11053Y	Pole	Antelope Acres
47	734449E	Pole	Antelope Acres
48	GT21256	Pole	Antelope Acres
49	4769852E	Pole	Antelope Acres
50	709136E	Pole	Antelope Acres
51	709135E	Pole	Antelope Acres
52	400281E	Pole	Antelope Acres
53	K5458Y	Pole	Antelope Acres
54	FTR127920	Pole	Antelope Acres
55	4776991E	Pole	Antelope Acres
56	K5457Y	Pole	Antelope Acres
57	734468E	Pole	Antelope Acres
58	GT12688	Pole	Antelope Acres
59	4339645E	Pole	Antelope Acres
60	4647714	Pole	Antelope Acres
61	4557485E	Pole	Quartz Hill
62	K2791Y	Pole	Quartz Hill
63	4839478E	Pole	Quartz Hill
64	K2788Y	Pole	Quartz Hill
65	4040436E	Pole	Quartz Hill
66	4630916E	Pole	Quartz Hill
67	878812E	Pole	Quartz Hill
68	K2793Y	Pole	Quartz Hill
69	K4600Y	Pole	Quartz Hill
70	4429438E	Pole	Quartz Hill
71	2175811E	Pole	Quartz Hill
72	1219022E	Pole	Quartz Hill
73	2233615	Pole	Quartz Hill
74	2334254E	Pole	Quartz Hill
75	2334255E	Pole	Quartz Hill
76	1341468E	Pole	Quartz Hill
77	4466671E	Pole	Quartz Hill
78	1847466E	Pole	Quartz Hill
79	1219044E	Pole	Quartz Hill
80	1421633E	Pole	Quartz Hill
81	408869E	Pole	Lake Hughes

82	408868E	Pole	Lake Hughes
83	1069937E	Pole	Lake Hughes
84	4782261E	Pole	Lake Hughes
85	4771879E	Pole	Lake Hughes
86	K11323Y	Pole	Lake Hughes
87	GT301084	Pole	Lake Hughes
88	4855074E	Pole	Lake Hughes
89	4855090E	Pole	Lake Hughes
90	K11446Y	Pole	Lake Hughes
91	307182E	Pole	Lake Hughes
92	307181E	Pole	Lake Hughes
93	4601864E	Pole	Lake Hughes
94	2301481E	Pole	Lake Hughes
95	4084302E	Pole	Lake Hughes
96	307164E	Pole	Lake Hughes
97	4137339E	Pole	Lake Hughes
98	4148060E	Pole	Lake Hughes
99	GT98601	Pole	Lake Hughes
100	4708158E	Pole	Lake Hughes
101	2007682E	Pole	Ranch Club
102	4090057E	Pole	Ranch Club
103	4628793E	Pole	Ranch Club
104	4090056E	Pole	Ranch Club
105	1789811E	Pole	Ranch Club
106	2208260E	Pole	Leona Valley
107	2238563E	Pole	Leona Valley
108	1054345H	Pole	Leona Valley
109	4313614E	Pole	Leona Valley
110	2273621E	Pole	Leona Valley
111	2273899E	Pole	Quartz Hill
112	42727 50 th Street	Manhole	Quartz Hill
113	20Q, 42418 50 th St., West	Manhole	Quartz Hill
114	3016, 42305 50 th St., West	Padmount	Quartz Hill
115	42305 50 th St., West	Padmount	Quartz Hill
116	42305 50 th St., West	Padmount	Quartz Hill
117	42305 50 th St., West	Pedestal	Quartz Hill
118	5017 Ave. M-12	Handhole	Quartz Hill
119	41404, 51 st West	Handhole	Quartz Hill
120	41428, 51 st West	Handhole	Quartz Hill
121	5025 M-8 St.	Pedestal	Quartz Hill
122	5022 West Avenue N	Vault	Palmdale

123	Rancho Vista and Ave Via Verde	Padmount	Palmdale
124	3005, Rancho Vista and Brisa Dr.	Padmount	Palmdale
125	XT-BO, Ranch Vista and Brisa Dr.	Padmount	Palmdale

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 poles required maintenance:

- The “eye” of the down guy anchor attached to the following poles was buried:
 - GT9431
 - 1451197E
 - 734468E
 - 1490712E
 - 955662E

- Missing or damaged a pole number tags was observed on each of the following poles:
 - 1451195E
 - K9488Y
 - FTR127920
 - 1295168E
 - K2195Y
 - K54571Y
 - 1310384E
 - 709135E
 - 878812E

- A damaged visibility strip was observed on each of the following poles:
 - 1490712E
 - 627165E
 - 735632E
 - 1295168E
 - 1341706E
 - 1491436E

- The lashing wire of the following poles was damaged:
 - 991721E
 - GT9431
 - 400281E
 - K5458Y

- The riser conductor conduit on Pole No. 538732E had detached from the pole.
- The pole-mounted fiber terminal attached to Pole No. 4466671E was not properly secured to the pole.

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:

- 1451196E
- 1847222E

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.

Permanently abandoned service drops was observed on or near each of the following poles:

- 4630916E
- 307181E
- 4090057E
- 4855074E
- 307164E

GO 128 Rule 34.3, Self-contained Surface-mounted Equipment, states in part:

Equipment installed partially or completely above the ground surface and not enclosed by a vault, room or fence shall conform to the following:

C. Locking Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.

The following above-ground enclosures were not secured against entry by unauthorized persons by means of locks or other suitable means:

- The Padmount at Rancho Vista Blvd and Avenue Vista Verde, Palmdale.
- The Padmount 3005, at Rancho Vista Blvd and Brisa Drive, Palmdale.
- The Padmount XT-BO, at Rancho Vista Blvd and Brisa Drive, Palmdale.

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 lid to the “Manhole” at 5025 M-8 street, Quartz Hill was unsecured.
- The lid to the “Handhole” at 41428 51st Street, Quartz Hill was unsecured.
- The lid to the “Handhole” at 41404 51st Street, Quartz Hill was unsecured.