

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 10, 2021

CA2021-900

Amy Warshauer
Manager – Government & External Affairs
Frontier Communications
2535 West Hillcrest Drive
Newbury, CA 91320

SUBJECT: Audit of Frontier's Malibu Region

Ms. Warshauer:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Saimon Islam and Stacey Ocampo of my staff conducted a Communication Infrastructure Provider (CIP) audit of Frontier's Malibu Region from May 17, 2021 to May 21, 2021. The audit included a review of Frontier's records and field inspections of 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 10, 2021, 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 Saimon Islam at (213) 266-4733 or Saimon.Islam@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
Majed Ibrahim, Senior Utilities Engineer, Electric Safety and Reliability Branch, CPUC
Saimon Islam, 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	2241668E	Pole	Corral Canyon
2	711033E	Pole	Corral Canyon
3	711034E	Pole	Corral Canyon
4	2240394E	Pole	Corral Canyon
5	4574512E	Pole	Corral Canyon
6	711036E	Pole	Corral Canyon
7	711037E	Pole	Corral Canyon
8	726894E	Pole	Malibu
9	1827201E	Pole	Malibu
10	4249681E	Pole	Malibu
11	893352E	Pole	Malibu
12	2240195E	Pole	Malibu
13	1143160E	Pole	Malibu
14	874478E	Pole	Malibu
15	4457714E	Pole	Malibu
16	874476E	Pole	Malibu
17	1143159E	Pole	Malibu
18	1027790E	Pole	Malibu
19	855443E	Pole	Malibu
20	4727664E	Pole	Malibu
21	1225903E	Pole	Malibu
22	2137131E	Pole	Malibu
23	4251131E	Pole	Malibu
24	3003014E	Pole	Malibu
25	3003013E	Pole	Malibu
26	3003012E	Pole	Malibu
27	GT205855	Pole	Malibu
28	4047418E	Pole	Malibu
29	4251117E	Pole	Malibu
30	GT106511	Pole	Malibu
31	3006788E	Pole	Malibu
32	4032945E	Pole	Malibu
33	618474Y	Pole	Malibu
34	1027712E	Pole	Malibu

35	1027713E	Pole	Malibu
36	1027714E	Pole	Malibu
37	1027715E	Pole	Malibu
38	1027716E	Pole	Malibu
39	1027717E	Pole	Malibu
40	4470084E	Pole	Malibu
41	4080800E	Pole	Malibu
42	1868205E	Pole	Malibu
43	1868134E	Pole	Malibu
44	4047501E	Pole	Malibu
45	4263210E	Pole	Malibu
46	1027721E	Pole	Malibu
47	4032094E	Pole	Malibu
48	1939838E	Pole	Malibu
49	4239900E	Pole	Malibu
50	3007049E	Pole	Malibu
51	1027720E	Pole	Point Dume
52	1027744E	Pole	Point Dume
53	1513734E	Pole	Point Dume
54	4495297E	Pole	Point Dume
55	GT112289	Pole	Point Dume
56	1330727E	Pole	Point Dume
57	1199191E	Pole	Point Dume
58	1199192E	Pole	Point Dume
59	1225947E	Pole	Point Dume
60	1225946E	Pole	Point Dume
61	20166SPR	Pole	Point Dume
62	29139Y	Pole	Point Dume
63	GT112286	Pole	Point Dume
64	89984E	Pole	Point Dume
65	1045709E	Pole	Point Dume
66	1045710E	Pole	Point Dume
67	GT112285	Pole	Point Dume
68	1045711E	Pole	Point Dume
69	1045712E	Pole	Point Dume
70	1045713E	Pole	Point Dume
71	1045714E	Pole	Point Dume
72	1045715E	Pole	Point Dume
73	1045716E	Pole	Point Dume
74	1199183E	Pole	Point Dume

75	1045718E	Pole	Point Dume
76	1045719E	Pole	Point Dume
77	4572677E	Pole	Point Dume
78	6508 Dume Drive	Pole	Point Dume
79	726855E	Pole	Point Dume
80	726856E	Pole	Point Dume
81	726857E	Pole	Point Dume
82	726858E	Pole	Point Dume
83	726859E	Pole	Point Dume
84	Across 6624 Dume Drive	Pole	Point Dume
85	GT111894	Pole	Point Dume
86	726860E	Pole	Point Dume
87	726861E	Pole	Point Dume
88	726862E	Pole	Point Dume
89	726863E	Pole	Point Dume
90	726864E	Pole	Point Dume
91	726865E	Pole	Point Dume
92	726866E	Pole	Point Dume
93	1199390E	Pole	Malibu
94	1330762E	Pole	Newton Canyon
95	1330763E	Pole	Newton Canyon
96	4216784E	Pole	Newton Canyon
97	1225901E	Pole	Newton Canyon
98	2250 Kanan Dume Road	Pole	Newton Canyon
99	2082037E	Pole	Malibu
100	2171601E	Pole	Malibu
101	996172E	Pole	Malibu
102	1593309E	Pole	Malibu
103	996171E	Pole	Malibu
104	996170E	Pole	Malibu
105	798201E	Pole	Malibu
106	GT114067	Pole	Malibu
107	1269276E	Pole	Malibu
108	4080366E	Pole	Malibu
109	1112Z	Handhole	Malibu
110	Structure next to XT1GC	Handhole	Malibu
111	170	Handhole	Malibu
112	Malibu Canyon Road & Pacific Coast Highway	Handhole	Malibu
113	217-240	Handhole	Malibu

114	1027M	Manhole	Malibu
115	Francisco Canyon Hub	Handhole	Malibu
116	Francisco Canyon F14	Handhole	Malibu
117	Francisco Canyon F13	Handhole	Malibu
118	Francisco Canyon F12	Handhole	Malibu
119	Francisco Canyon F11	Handhole	Malibu
120	Francisco Canyon F4	Handhole	Malibu

III. Field Inspection – Violations List

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 facilities on each of the following poles required maintenance:

- 1027715E – Frontier lashing wire was broken.
- 89984E – Incomplete pole transfer
- 1045716E – Incomplete pole transfer
- 1199183E – Incomplete pole transfer
- 4080366E – Incomplete pole transfer
- 618474Y – Frontier service drop was not properly attached to building.
- 726860E – Frontier lashing wire was broken.
- 1027712E – Frontier service drop was not properly attached to building.
- 1593309E – Frontier lashing wire was broken.
- 1027714E – Frontier cross connect box was not properly attached to pole.
- 1027715E - A Mylar balloon was attached to a span of Frontier conductors.
- 1045713E – Frontier terminal not properly attached to 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).

Frontier communications conductors attached to pole GT114067 were strained by vegetation.

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.

Frontier down guy wire attached to each of the following poles was not taut:

- 726865E
- 1269276E

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 Frontier riser supported on each of the following poles was not properly protected:

- 4574512E – Riser was not protected with conduit.
- 1827201E – Riser was not protected with conduit.
- 4727664E – Riser was not protected with conduit.
- 1045710E – Riser was not protected with conduit.
- 1045714E – Riser was not protected with conduit.
- 1045718E – Riser was not protected with conduit.
- 726855E – Riser was not protected with conduit.
- 726860E – Riser was not protected with conduit.
- 726864E – Riser was not protected with conduit.
- 711034E – Conduit was not fully covering riser.
- 1593309 – Conduit protecting riser was broken.

GO 95, Rule 84.8-C3b: Above Ground in Areas Accessible to Pedestrians Only, states in part:

Residential Premises: Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet. EXCEPTION: If the building served does not permit an attachment which will provide this 10 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches.

A Frontier service drop attached to pole 1027717 had an above ground clearance of approximately 3 feet.

General Order 95, Rule 84.4-G requires a minimum of 3 inches radial separation between communication cables and guy wires.

The radial separation between Frontier communications conductors and a third-party communications guy wire on each of the following poles was less than 3 inches:

- 726861E
- 996171E

GO 95, Rule 38, Table 2, Case 8, Column C requires the minimum vertical separation between communications conductors on separate crossarms or other supports at different levels on the same pole and in adjoining midspans to be 12 inches.

The vertical separation between Frontier communications conductors and a third-party communications conductor on each of the following poles was less than 12 inches:

- 711036E
- 726894E
- 893352E
- 1143160E
- 874478E
- 874476E
- 855443E
- 1330727E
- 726862E
- 1225903E

General Order 95, Rule 84.8-D4, Clearances between Conductors, states:

The radial clearance between communication service drops conductors and supply service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.

The radial separation between a Frontier communications service drop and a Southern California Edison (SCE) supply service drop on each of the following poles was less than 12 inches within 15 feet away from the point of attachment:

- 874478E
- 3007049E
- 4470084E
- 1330727E

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:

- 893352E
- 2137131E
- 618474Y
- 1027715E
- 1939838E
- 1045712E
- 1199183E
- GT111894
- 726866E
- 996170E

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 [the] communication or supply lines and equipment.

The following Frontier underground facilities were not maintained for their intended use:

- The handhole cover 1112Z was missing a bolt.
- The handhole cover 170 was missing bolts.
- The handhole located in the corner of Malibu Canyon and Pacific Coast Highway has an abandoned service drop.
- The handhole cover F14 located in Francisco Canyon was missing a bolt.
- The handhole cover F11 located in Francisco Canyon was missing a bolt.