

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 24, 2022

CA2022-934

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

SUBJECT: Audit of Frontier’s Monrovia Region

Mr. Born:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Stacey Ocampo of my staff conducted a Communication Infrastructure Provider (CIP) audit of Frontier’s Monrovia Region from June 27, 2022 to July 1, 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 September 26, 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 Stacey Ocampo at (213) 266-4712 or Stacey.Ocampo@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
Stacey Ocampo, 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	1512457E	Pole	Monrovia
2	415 Primrose Avenue	Pole	Monrovia
3	2310631E	Pole	Monrovia
4	458713E	Pole	Monrovia
5	4650429E	Pole	Monrovia
6	4168186E	Pole	Monrovia
7	458711E	Pole	Monrovia
8	419 Magnolia Avenue	Pole	Monrovia
9	Across 418 Magnolia Avenue	Pole	Monrovia
10	458716E	Pole	Monrovia
11	X4847E	Pole	Arcadia
12	X12410E	Pole	Arcadia
13	X11620E	Pole	Arcadia
14	4518366E	Pole	Arcadia
15	488208E	Pole	Arcadia
16	1429762E	Pole	Arcadia
17	800 Forest Avenue	Pole	Arcadia
18	4880411E	Pole	Arcadia
19	X11625E	Pole	Arcadia
20	4463126E	Pole	Arcadia
21	4650431E	Pole	Arcadia
22	4463127E	Pole	Arcadia
23	4463128E	Pole	Arcadia
24	4463129E	Pole	Arcadia
25	4463130E	Pole	Arcadia
26	550799E	Pole	Arcadia
27	4017168E	Pole	Bradbury
28	2222296E	Pole	Bradbury
29	1769065E	Pole	Bradbury
30	1223790E	Pole	Bradbury
31	4601761E	Pole	Bradbury
32	665293E	Pole	Bradbury
33	665295E	Pole	Bradbury
34	1165509E	Pole	Bradbury
35	4741387E	Pole	Bradbury

No.	Structure Number	Type of Structure	City
36	4597355E	Pole	Bradbury
37	4949746E	Pole	Bradbury
38	4569350E	Pole	Bradbury
39	143235E	Pole	Bradbury
40	4566167E	Pole	Bradbury
41	4729132E	Pole	Monrovia
42	4593289E	Pole	Monrovia
43	4763427E	Pole	Monrovia
44	4593295E	Pole	Monrovia
45	1992884E	Pole	Monrovia
46	4593294E	Pole	Monrovia
47	4585999E	Pole	Monrovia
48	4585998E	Pole	Monrovia
49	717780E	Pole	Monrovia
50	4586000E	Pole	Monrovia
51	768927E	Pole	Monrovia
52	GT127747	Pole	Baldwin Park
53	4007319E	Pole	Baldwin Park
54	4007320E	Pole	Baldwin Park
55	4007321E	Pole	Baldwin Park
56	4007322E	Pole	Baldwin Park
57	4007323E	Pole	Baldwin Park
58	2354544E	Pole	Baldwin Park
59	1041408E	Pole	Baldwin Park
60	2354577E	Pole	Baldwin Park
61	1041409E	Pole	Baldwin Park
62	2336CWT	Pole	Baldwin Park
63	2335CWT	Pole	Baldwin Park
64	2334CWT	Pole	Baldwin Park
65	902930E	Pole	Baldwin Park
66	4221364E	Pole	El Monte
67	4221363E	Pole	El Monte
68	4221365E	Pole	El Monte
69	4221366E	Pole	El Monte
70	4221367E	Pole	El Monte
71	4221368E	Pole	El Monte
72	4038542E	Pole	El Monte
73	4022595E	Pole	El Monte
74	4441160E	Pole	El Monte

No.	Structure Number	Pole	City
75	4038545E	Pole	El Monte
76	1224663E	Pole	Bradbury
77	122475E	Pole	Bradbury
78	FTR120358	Pole	Duarte
79	922414E	Pole	Duarte
80	9345 Crestfield Drive	Pole	Duarte
81	4426682E	Pole	Duarte
82	1005938E	Pole	Duarte
83	4741553E	Pole	Duarte
84	1005937E	Pole	Duarte
85	4647547E	Pole	Duarte
86	1250927E	Pole	Monrovia
87	1250925E	Pole	Monrovia
88	1250926E	Pole	Monrovia
89	GT94259	Pole	Duarte
90	1512533E	Pole	Duarte
91	4082059E	Pole	Monrovia
92	671804E	Pole	Monrovia
93	4782MA	Pole	Azusa
94	4781MA	Pole	Azusa
95	4780MA	Pole	Azusa
96	4779MA	Pole	Azusa
97	4808MA	Pole	Azusa
98	4800MA	Pole	Azusa
99	4810MA	Pole	Azusa
100	4811MA	Pole	Azusa
101	630 Dalton Avenue	Pole	Azusa
102	4802MA	Pole	Azusa
103	4801MA	Pole	Azusa
104	4800MA	Pole	Azusa
105	4799MA	Pole	Azusa
106	538 Alta Vista	Vault	Monrovia
107	518 Alta Vista	Handhole	Monrovia
108	AKF124	Manhole	Monrovia
109	474 Patrician Way	Manhole	Monrovia
110	102 James Town	Vault	Monrovia
111	106 James Town	Handhole	Monrovia
112	546 Alta Vista	Vault	Monrovia

No.	Structure Number	Type of Structure	City
113	554 Alta Vista	Vault	Monrovia
114	211 E. Foothill Blvd	BBOX	Arcadia
115	3472	Pedestal	Arcadia
116	1286 Oakglen Avenue	Pedestal	Arcadia
117	3471	Pedestal	Arcadia
118	1266 Oakglen Avenue	Pedestal	Arcadia
119	3218 Shadylawn Drive	Handhole	Duarte
120	3348 Shadylawn Drive	Handhole	Duarte
121	3349 Tannencrest Drive	Handhole	Duarte
122	3238 Tannencrest Drive	Handhole	Duarte
123	1040 Royal Oaks Drive	Vault	Duarte
124	1042D Royal Oaks Drive	Vault	Duarte
125	Across 1044B Royal Oaks Drive	Vault	Duarte
126	1034B Royal Oaks Drive	Vault	Duarte
127	1034E Royal Oaks Drive	Vault	Duarte

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.

Frontier’s facilities on each of the following poles required maintenance:

- 4949746E – Incomplete pole transfer
- 717780E – The “eye” of the Frontier down guy anchor was buried in the dirt.
- 2310631E – Frontier service drop was not properly attached to building.
- FTR120358 – A Frontier lashing wire was broken.
- FTR120358 – A Frontier communication conductor was not properly attached to guard arm.
- Located at 630 Dalton Avenue – The junction box was not properly attached.
- 4569350E - A Frontier communications conductor was not properly secured to its messenger, such as with zip ties.
- 122475E – A Frontier down guy wire was strained by vegetation.

The Frontier terminal located at each of the following poles was not properly attached:

- 1512457E
- 1992884E
- 4586000E

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 each of the following poles was not taut:

- Located at 419 Magnolia Avenue
- 4585998E
- 1250927E

General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19, Column C, 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 pole 4007321E 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:

- 458716E
- X11620E
- 4729132E

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 and not removed:

- 1769065E
- 4221365E
- 4802MA
- 4586000E
- 4779MA
- 4800MA

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 each of the following poles was damaged or missing:

- 1429762E
- 4007319E
- 4007321E
- 4007323E

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

- 4463130E
- 4168186E
- 4585998E

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 vault lid located next to 102 James Town was damaged.