



1919 McKinney Ave., Dallas, TX 75201  
[Frontier.com](https://www.frontier.com)

SENT VIA ELECTRONIC MAIL

May 14, 2025

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 Frontier West Los Angeles County Audit Report

Fadi Daye,

Frontier California Inc (U-1002-C) ("Frontier") hereby responds to the California Public Utilities Commission (Commission) audit report dated April 9, 2025, regarding the Frontier West Los Angeles County Communications Infrastructure Provider (CIP) audit conducted December 9, 2024, through December 13, 2024.

## **I. Records Review**

- Overhead detail and patrol inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Frontier's Intrusive Inspection of Wood Poles
- Frontier's Overhead Lines Maintenance Plan
- Frontier's Visual Inspections of Overhead Lines

## **II. Field Inspection**

## **III. Field Inspection - Violations List**

ESRB observed the following violations during the field inspection:

**GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards**, states: *(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such safety hazard(s) no*

*later than 10 business days after the discovery.*

Frontier did not report the following third-party GO 95 nonconformances:

- Pole 334760M – a third-party communications service drop was wrapped around a Frontier conductor span.
- Pole 334761M – a third-party communications cable span was detached from the messenger span and contacting a Frontier conductor span.
- Pole 334761M – a supply down guy anchor near the pole was abandoned and covered with a section of plastic pipe.

**Response:** Tickets have been issued to resolve nonconformance. See attached “Frontier CPUC West Los Angeles Audit Tickets.xls”.

**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:

- Pole 390218M – The down guy marker supported on the pole was damaged.
- Pole 1140836E – The conductor span had a broken lashing wire.

**Response:** Tickets have been issued to resolve nonconformance. See attached “Frontier CPUC West Los Angeles Audit Tickets.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.*

Frontier facilities on each of the following poles were permanently abandoned and should be removed:

- Pole 93235M – a detached service drop was hanging on a pole step located at the communication level.
- Pole 1358204E – a detached service drop was left to hang off the conductor span near the pole.

**Response:** Tickets have been issued to resolve nonconformance. See attached “Frontier CPUC West Los Angeles Audit Tickets.xls”.

**GO 95, Rule 37: Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc. Table 1, Column B, Case 4** requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0-750

*Volts” that are “Crossing or along thoroughfares in urban districts or crossing thoroughfares in rural areas,” to be 18 feet.*

A conductor span supported on Pole 4258279E and crossing an apartment complex driveway entering from Donora Ave in the City of Torrance was measured to have a vertical clearance of 13 feet, 5 inches from ground.

**Response:** Tickets have been issued to resolve nonconformance. See attached “Frontier CPUC West Los Angeles Audit Tickets.xls”.

**GO 95, Rule 37: Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc. Table 1, Column B, Case 5,** *requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0-750 Volts” that are “Above ground in areas accessible to pedestrians only” to be 10 feet.*

Frontier facilities on each of the following poles had less than the required minimal vertical clearance:

- Pole 2255629E – a service drop was wrapped around a riser supported on the pole and touching a 6-foot fence at midspan.
- Pole 1035660E – a service drop supported on the pole sagged to approximately 6 feet above the ground over a walkway.

**Response:** Tickets have been issued to resolve nonconformance. See attached “Frontier CPUC West Los Angeles Audit Tickets.xls”.

**GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8** *requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.*

Frontier facilities on each of the following poles did not have the minimum required vertical clearance:

- Pole 396356M - a Frontier conductor span was touching a third-party communications conductor span near the pole.
- Pole 93243M – a Frontier service drop was touching a supply service drop at midspan that was supported on the same pole.
- Pole 606496E – a Frontier conductor span was touching a third-party communications conductor at midspan that was supported on the same pole.
- Pole 900498E – multiple Frontier service drops were attached to a third-party communications conductor that was supported on the pole.
- Pole 1035658E – a Frontier conductor span was attached to a third-party communications conductor at midspan that was supported on the same pole.

- Pole 1140835E – a Frontier conductor span was touching a third-party communications conductor at midspan that was supported on the same pole.

**Response:** Tickets have been issued to resolve nonconformance. See attached “Frontier CPUC West Los Angeles Audit Tickets.xls”.

**GO 95, Rule 86.2, Use,** 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.*

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

- Pole 93242M – the down guy wire supporting the Frontier facilities level of the pole was not maintained taut.
- Pole 390218M – the down guy wire supporting the Frontier facilities level of the pole was not maintained taut.

**Response:** Tickets have been issued to resolve nonconformance. See attached “Frontier CPUC West Los Angeles Audit Tickets.xls”.

**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.*

The Frontier ground wire protective covering on each of the following poles was damaged:

- Pole 93241M – the ground wire protective covering supported on the pole was damaged, exposing sections of the ground wire at the public level.
- Pole 93239M – the ground wire protective covering supported on the pole was damaged, exposing the ground wire at the public level.
- Pole 93237M – the ground wire protective covering was damaged and loosely secured to the pole, exposing a 5-foot section of ground wire at the public level.

**Response:** Tickets have been issued to resolve nonconformance. See attached “Frontier CPUC West Los Angeles Audit Tickets.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 GT10180 was obstructed near the base of the pole by branches and foliage.

**Response:** Tickets have been issued to resolve nonconformance. See attached "Frontier CPUC West Los Angeles Audit Tickets.xls"

**GO 95, Rule 87.7-D.1, 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...*

The Frontier riser on each of the following poles was not covered:

- Pole 4887267E – multiple loosely risers attached to the surface of the pole were not covered and protected at the public level.
- Pole 617988E – a loosely attached riser to the surface of the pole was not covered and protected

**Response:** Tickets have been issued to resolve nonconformance. See attached "Frontier CPUC West Los Angeles Audit Tickets.xls".

If you have any questions, please do not hesitate to contact me at 214-724-7719, or [judy.geise@ftr.com](mailto:judy.geise@ftr.com)

Sincerely,

/s/ Judy Geise  
Manager, Regulatory  
Frontier  
[judy.geise@ftr.com](mailto:judy.geise@ftr.com)

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC  
Eric Wu, Program Manager, ESRB, SED, CPUC  
Eric Ujjiye, Utilities Engineer, ESRB, SED, CPUC  
Jenny Smith, Director Government and Regulatory Affairs, Frontier

Item	City	Structure ID	Type	Ticket ID
1	Playa Del Ray	396356M	Pole	T-00452389
3	Playa Del Ray	334760M	Pole	T-00452383
4	Playa Del Ray	334761M	Pole	T-00452390
4	Playa Del Ray	334761M	Pole	T-00452391
19	Santa Monica	2255629E	Pole	T-00419351
23	Culver City	93242M	Pole	T-00452503
26	Culver City	93241M	Pole	T-00452395
27	Culver City	93243M	Pole	T-00452396
28	Culver City	93239M	Pole	T-00112328
32	Culver City	93237M	Pole	T-00450917
34	Culver City	93235M	Pole	T-00313636
35	Culver City	93234M	Pole	T-00452397
42	Culver City	390218M	Pole	T-00452398
42	Culver City	390218M	Pole	T-00452398
61	Manhattan Beach	606496E	Pole	T-00452399

64	Manhattan Beach	4887267E	Pole	T-00452400
75	Redondo Beach	GT10180	Pole	T-00452401
82	Redondo Beach	900498E	Pole	T-00452402
84	Redondo Beach	617988E	Pole	T-00452403
101	Torrance	1035658E	Pole	T-00452404
103	Torrance	1035660E	Pole	T00452405
106	Torrance	1140836E	Pole	T-00452406
107	Torrance	1140835E	Pole	T-00119107
109	Torrance	1358204E	Pole	T-00452407
114	Torrance	4258279E	Pole	T-00452504

Violation	Priority Lev	Affected Company	Inspection Date
a Frontier conductor span was touching a third-party communications conductor span near the	2B	Frontier	12/9/2024
a third-party communications service drop was wrapped around a Frontier conductor span	2B	Spectrum/Charter	12/9/2024
a third-party communications cable span was detached from the messenger span and contacting a Frontier conductor span	2B	Spectrum/Charter	12/9/2024
a supply down guy anchor near the pole was abandoned and covered with a section of plastic pipe	2C	SCE	12/9/2024
a service drop was wrapped around a riser supported on the pole and touching a 6-foot fence at midspan	2C	Frontier	12/9/2024
the down guy wire supporting the Frontier facilities level of the pole was not maintained taut.	2C	Frontier	12/9/2024
the ground wire protective covering supported on the pole was damaged, exposing sections of the ground wire at the public level	2C	Frontier	12/9/2024
a Frontier service drop was touching a supply service drop at midspan that was supported on the same pole	2C	Frontier	12/9/2024
the ground wire protective covering supported on the pole was damaged, exposing the ground wire at the public leve	2C	Frontier	12/9/2024
the ground wire protective covering was damaged and loosely secured to the pole, exposing a 5-foot section of ground wire at the public level	2C	Frontier	12/9/2024
a detached service drop was hanging on a pole step located at the communication level.	2C	Frontier	12/9/2024
the down guy wire supporting the Frontier facilities level of the pole was not maintained taut	2C	Frontier	12/9/2024
The down guy marker supported on the pole was damaged	2C	Frontier???	12/9/2024
the down guy wire supporting the Frontier facilities level of the pole was not maintained taut	2C	Frontier???	12/9/2024
a Frontier conductor span was touching a third-party communications conductor at midspan that was supported on the same pole	2C	Frontier	12/9/2024



multiple loosely risers attached to the surface of the pole were not covered and protected at the public level	2C	Frontier	12/9/2024
The climbing space on Pole GT10180 was obstructed near the base of the pole by branches and foliage	3	Frontier	12/9/2024
multiple Frontier service drops were attached to a third-party communications conductor that was supported on the pole	2C	Frontier	12/9/2024
a loosely attached riser to the surface of the pole was not covered and protected at the public level	2C	Frontier	12/9/2024
a Frontier conductor span was attached to a third-party communications conductor at midspan that was supported on the same pole	2C	Frontier	12/9/2024
a service drop supported on the pole sagged to approximately 6 feet above the ground over a walkway	2A	Frontier	12/9/2024
The conductor span had a broken lashing wire	2B	Frontier	12/9/2024
a Frontier conductor span was touching a third-party communications conductor at midspan that was supported on the same pole	2C	Frontier	12/9/2024
a detached service drop was left to hang off the conductor span near the pole.	2C	Frontier	12/9/2024
A conductor span was measured to have a vertical clearance of 13 feet, 5 inches from ground.	2B	Frontier	12/9/2024

[illegible]

[illegible]