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Frontier.com

SENT VIA ELECTRONIC MAIL

May 5, 2025

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Re: Response to Alturas Region CIP Audit Report

Rickey Tse,

Citizens Telecommunications Company of California Inc. d/b/a Frontier Communications of California (U1024-C) ("Frontier") hereby responds to the California Public Utilities Commission (Commission) report regarding Frontier's Alturas Region wire centers Communications Infrastructure Provider (CIP) audit conducted from September 30, 2024 through October 04, 2024.

I. Records Review

II. Records Violations

ESRB observed the following violations during the records review portion of the audit:

1. General Order (GO) 128, Rule 17.2, Inspection states in part:

"Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules."

GO 128, Rule 42.2, Manholes and Handholes, Maintenance and Inspection states:

"See rules 12.2 and 17.2"

Frontier Inspection Maintenance Procedure (January 2024) states in part:

"GO 128 requires communications systems to be "inspected by the operator frequently and thoroughly" to ensure that they are in "good condition." GO 128, Rule 17.2. Frontier California complies with this requirement.

Frontier California has regular Manhole T-Zone inspections, which requires that Field Technicians examine the entire manhole for defects.”

ESRB reviewed Frontier’s patrol and inspection records from August 2019 through August 2024. Frontier did not provide any underground inspection records from the applicable time period. Frontier’s Inspection Program also fails to assign inspection intervals to its underground assets. Frontier must update its program and maintain records of its inspections to comply with the requirements of GO 128, Rule 17.2.

Response: Frontier’s Inspection Maintenance Procedure accurately depicts the manhole inspection process for complying with GO 128, Rule 17.2. Frontier conducts frequent and thorough underground inspections as part of the routine onsite process when a field team member accesses a manhole or handhole. Each instance includes thoroughly examining the manhole for defects. Frontier and industry competitors apply this onsite approach as opposed to scheduled inspections which can divert resources, cause community disruption for traffic control and be costly. Furthermore, under GO 128 rules, there is no obligation to create or maintain specific inspection records for GO 128 compliance. Any repair would follow the normal course of business and not be documented separately or tracked differently as a repair specific to a manhole or GO 128 inspections.

2. GO 95, Rule 18-B, Maintenance Programs states in part:

“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company’s facilities.”

(1) *“Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.*

- a. The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:*
 - i. Level 1 -- An immediate risk of high potential impact to safety or reliability:*
 - Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
 - ii. Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*

- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*
- iii. *Level 3 -- Any risk of low potential impact to safety or reliability:*
- *Take corrective action within 60 months subject to the exception specified below."*

ESRB reviewed Frontier's Alturas area corrective notifications from August 2019 through August 2024 and found that Frontier has twelve late notifications out of 117 (10.3%) total. Table 1 breaks down the total late notifications for the Alturas area by priority.

Table 1: Alturas Region Late Notifications

Priority Levels	Late Pending	Late Complete	Total
1	0	1	1
2	2	9	11
3	0	0	0
Total	2	10	12

Table 1 includes both late complete notifications and the late pending notifications for each priority. Late completed notifications are any notifications completed after the due dates that apply to the notifications' priority level per GO 95, Rule 18-B. Late pending notifications are any notifications that were still open with a due date prior to August 01, 2024.

Response: The two late pending tickets will be completed by May 31, 2025: TK2737278 (Bieber) Down guy wire broken/loose and TK2737279 (Bieber) Down guy wire broken/loose.

III. Field Inspection

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. 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."

ESRB's findings related to the above rule are listed in Table 2:

Table 2: GO 95, Rule 31.1 Findings

Location	Findings
2	Needs a proper splice box
34	Splice box not secured
40	Missing Hi-vis strip by road
41	Missing Hi-vis strip by road
79	Pole has significant woodpecker damage
90	Pole is decayed
106	Splice cover is broken
108	Pole is decayed
112	Missing Hi-vis strip by road

Response: Tickets were issued to resolve the noted infractions. See "CPUC West Alturas Tickets.xls".

2. 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."

ESRB's findings related to the above rule are listed in Table 3:

Table 3: GO 95, Rule 31.6 Findings

Location	Findings
6	Abandoned service drop
96	Abandoned service drop
98	Abandoned ground wire

Response: Tickets were issued to resolve the noted infractions. See "CPUC West Alturas Tickets.xls".

3. GO 95, Rule 84.6-B, Ground Wires states:

“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. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.

Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8).”

ESRB’s findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 84.6-B Findings

Location	Findings
21	Exposed ground wire
35	Exposed ground wire
36	Exposed ground wire
76	Exposed ground wire
81	Exposed ground wire
115	Exposed ground wire

Response: Tickets were issued to resolve the noted infractions. See “CPUC West Alturas Tickets.xls”.

4. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, etc. states:

“Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.

The clearances specified in Table 1, Case 1, Columns A, B, D, E and F, shall in no case be reduced more than 5% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions. The clearances specified in Table 1, Cases 2 to 6 inclusive, shall in no case be reduced more than 10% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions.

The clearance specified in Table 1, Case 1, Column C (22.5 feet), shall in no case be reduced below

the tabular value because of temperature and loading as specified in Rule 43.

The clearances specified in Table 1, Cases 11, 12 and 13, shall in no case be reduced below the tabular values because of temperatures and loading as specified in Rule 43.

Where supply conductors are supported by suspension insulators at crossings over railroads which transport freight cars, the initial clearances shall be sufficient to prevent reduction to clearances less than 95% of the clearances specified in Table 1, Case 1, through the breaking of a conductor in either of the adjoining spans.

Where conductors, dead ends, and metal pins are concerned in any clearance specified in these rules, all clearances of less than 5 inches shall be applicable from surface of conductors (not including tie wires), dead ends, and metal pins, except clearances between surface of crossarm and conductors supported on pins and insulators (referred to in Table 1, Case 9) in which case the minimum clearance specified shall apply between center line of conductor and surface of crossarm or other line structure on which the conductor is supported.

All clearances of 5 inches or more shall be applicable from the center lines of conductors concerned.

When measuring the minimum allowable vertical conductor clearances in a span, the minimum clearance applies to the specific location under the span being measured and not for the entire span.”

ESRB’s findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 37 Findings

Location	Findings
19	Low service drop
39	Excess fiber hanging too low
50	Low service drop due to broken lashing
61	Low service drop
64	Low span
106	Low span

Response: Tickets were issued to resolve the noted infractions. See “CPUC West Alturas Tickets.xls”.

5. GO 95, Rule 38, Minimum Clearance of Wires from Other Wires states in part:

“The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind.

Conductors may be dead ended at the crossarm or have reduced clearances at points of transposition and shall not be held in violation of Table 2, Cases 8–15, inclusive.”

ESRB’s findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 38 Findings

Location	Findings
5	Phone attached to electric service
18	Improper clearance to cable

Response: Tickets were issued to resolve the noted infractions. See “CPUC West Alturas Tickets.xls”.

6. GO 95, Rule 92.4-C(2)(c), Grounding states in part:

“Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground.”

ESRB’s findings related to the above rule are listed in Table 7:

Table 7: GO 95, Rule 92.4-C(2)(c) Findings

Location	Findings
35	Exposed ground rod
49	Exposed ground rod

Response: Tickets were issued to resolve the noted infractions. See “CPUC West Alturas Tickets.xls”.

7. GO 95, Rule 86.2, Guys-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.”

ESRB’s findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 86.2 Findings

Location	Findings
108	Guy has broken away from anchor
109	Slack guy
111	Improper tension and angle on queens post

Response: Tickets were issued to resolve the noted infractions. See “CPUC West Alturas Tickets.xls”.

8. GO 95, Rule 86.9, Guy Marker (Guy Guard) states:

“A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.”

ESRB’s findings related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 86.9 Findings

Location	Findings
41	Missing guy guard
77	Missing guy guard
92	Missing guy guard

Location	Findings
109	Missing guy guard
115	Missing guy guard

Response: Tickets were issued to resolve the noted infractions. See “CPUC West Alturas Tickets.xls”.

9. GO 95, Rule 87.7-D (1), Risers, Covered from Ground Level to 8 Feet above the Ground states:

“Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by

metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8”

ESRB’s findings related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 87.7-D (1) Findings

Location	Findings
34	Missing riser guard
42	Missing riser guard
52	Missing riser guard
54	Riser guard is not 8 feet
68	Missing riser guard
109	Riser guard is not 8 feet

Response: Tickets were issued to resolve the noted infractions. See “CPUC West Alturas Tickets.xls”.

10. 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.

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.”

ESRB’s finding related to the above rule is listed in Table 11:

Table 11: GO 128, Rule 17.1 Finding

Location	Finding
93	Pedestal damaged

Response: A ticket was issued to resolve the noted infraction. See “CPUC West Alturas Tickets.xls”.

11. GO 128, Rule 17.8 Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

“Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.”

ESRB’s finding related to the above rule is listed in Table 12:

Table 12: GO 128, Rule 17.8 Finding

Location	Finding
9	Illegible ownership sticker

Response: A ticket was issued to resolve the noted infraction. See “CPUC West Alturas Tickets.xls”.

12. GO 128, Rule 43.3A, Buried Cables and Conductors, Clearances and Depths, Independently Installed states:

“Buried communication cables and conductors, when independently installed, shall be separated where practicable from supply system ducts and buried cables or conductors by not less than 3 inches of concrete, 4 inches of brick masonry, or 12 inches of earth.”

ESRB’s findings related to the above rule are listed in Table 13:

Table 13: GO 128, Rule 43.3A Findings

Location	Findings
66	Buried cable is exposed above ground
67	Buried cable is exposed above ground for approximately 1 mile
110	Buried cable is exposed above ground

Response: Tickets were issued to resolve the noted infractions. See “CPUC West Alturas Tickets.xls”.

V. Observations

1. GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities states in part:

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property.”

GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety

Hazards states in part:

“(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 ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95.”

During the field inspection, ESRB noted the third-party safety concerns listed in Table 14.

Table 14: Third-Party Observations

Location	Entity	Violation Description
10	Charter	Cable drop on Frontier span

Location	Entity	Violation Description
26	PacificCorp	Remove Buddy pole
26	Charter	Slack down guy
51	Unknown	Clearance on span
52	Unknown	Exposed ground rod
52	Unknown	Ground missing cover
56	Unknown	Pole sounds hollow when struck, needs replace
57	PG&E	Pole deteriorated, woodpecker damage
78	Surprise Valley	Down guy missing marker
94	Surprise Valley	Abandoned service

Response: Tickets were issued to resolve the noted infractions. See “CPUC West Alturas Tickets.xls”.

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

Sincerely,

/s/ Judy Geise
Manager, Regulatory
Frontier
judy.geise@ftr.com

Attachment

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Yi "Rocky" Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services, Analyst, ESRB, SED, CPUC
Jenny Smith, Director Government and Regulatory Affairs, Frontier

Location #	Structure Type	Ticket ID
2	Pole	T-00453168
5	Pole	T-00453169
6	Pole	T-00453172
9	Pedestal	T-00453173
10	Pole	T-00453174
18	Pole	T-00005116
19	Pole	T-00453179
21	Pole	T-00453182
26	Pole	T-00453184
26	Pole	T-00453186
34	Pole	T-00453188
35	Pole	T-00453190
36	Pole	T-00453423
39	Pole	T-00453427
40	Pole	T-00453437
41	Pole	T-00453440
42	Pole	T-00453443
49	Pole	T-00453447
50	Pole	T-00453470
51	Pole	T-00453489
52	Pole	T-00453494
52	Pole	T-00453494
54	Pole	T-00453498
56	Pole	T-00453502
57	Pole	T-00453506
61	Pole	T-00453570
64	Pole	T-00453573
66	Pedestal	T-00453576
67	Pedestal	T-00453578
68	Pole	T-00453579
76	Pole	T-00453718
77	Pole	T-00453719
78	Pole	T-00453720
79	Pole	T-00453723
81	Pole	T-00453724
90	Pole	T-00453725
92	Pole	T-00453727
93	Pedestal	T-00453728
94	Pole	T-00453730
96	Pole	T-00453731
98	Pole	T-00453734

106	Pole	T-00453736
108	Pole	T-00453737
109	Pole	T-00453739
110	Pedestal	T-00453740
111	Pole	T-00453741
112	Pole	T-00453743
115	Pole	T-00453745

Violation	Priority Level	Affected Company
Needs a proper splice box	2C	Frontier
Phone attached to electric service	2B	Frontier
Abandoned service drop	3	Frontier
Illegible ownership sticker	Low	Frontier
Cable drop on Frontier span	2C	Charter
Improper clearance to cable	2C	Frontier
Low service drop	2B	Frontier
Exposed ground wire	2B	Frontier
Remove Buddy pole	2C	PacificCorp
Slack down guy	2B	Charter
Splice box not secured & Missing riser guard	2C	Frontier
Exposed ground wire & Exposed ground rod	2B	Frontier
Exposed ground wire	2B	Frontier
Excess fiber hanging too low	2B	Frontier
Missing Hi-vis strip by road	2C	Frontier
Missing Hi-vis strip by road & Missing guy guard	2C	Frontier
Missing riser guard	3	Frontier
Exposed ground rod	2B	Frontier
Low service drop due to broken lashing	2B	Frontier
Clearance on span	2B	Unknown
Missing riser guard	2C	Frontier
Exposed ground rod & Ground missing cover	2B	Unknown
Missing riser guard	2C	Frontier
Pole sounds hollow when struck, needs replace	2A	Unknown - PG&E?
Pole deteriorated, woodpecker damage	2B	PG&E
Low service drop	2B	Frontier
Low span	2B	Frontier
Buried cable is exposed above ground	Normal	Frontier
Buried cable is exposed above ground for approximately 1 mile	Normal	Frontier
Missing riser guard	2C	Frontier
Exposed ground wire	2B	Frontier
Missing guy guard	2C	Frontier
Down guy missing marker	2C	Surprise Valley
Pole has significant woodpecker damage	2B	Frontier
Exposed ground wire	2B	Frontier
Pole is decayed	2A	Frontier
Missing guy guard	2C	Frontier
Pedestal damaged	Normal	Frontier
Abandoned service	2B	Surprise Valley
Abandoned service drop	3	Frontier
Abandoned ground wire	3	Frontier

Splice cover is broken & Low span	2C	Frontier
Pole is decayed & Guy has broken away from anchor	2A	Frontier
Slack guy & Missing guy guard & Riser Guard is not 8 feet	2C	Frontier
Buried cable is exposed above ground	Normal	Frontier
Improper tension and angle on queens post	2C	Frontier
Missing Hi-vis strip by road	2C	Frontier
Exposed ground wire & Missing guy guard	2C	Frontier

Due Date	Inspection Date	HF Tier	TKT Status	CITY	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	TIER 2	New	BIEBER	
9/30/2025	9/30/2024	TIER 2	New	BIEBER	
9/30/2025	9/30/2024	TIER 2	New	BIEBER	
9/30/2027	9/30/2024	TIER 2	New	BIEBER	
4/30/2025	9/30/2024	TIER 2	New	BIEBER	
9/30/2025	9/30/2024	TIER 2	New	BIEBER	
9/30/2025	9/30/2024	TIER 2	New	BIEBER	
9/30/2025	9/30/2024	TIER 2	New	BIEBER	
9/30/2025	9/30/2024	GEN	New	BIEBER	
9/30/2025	9/30/2024	GEN	New	BIEBER	
9/30/2027	9/30/2024	TIER 2	New	ADIN	
9/30/2025	9/30/2024	TIER 2	New	ADIN	
9/30/2027	9/30/2024	TIER 2	New	ADIN	
9/30/2027	9/30/2024	TIER 2	New	ADIN	
9/30/2025	9/30/2024	TIER 2	New	ADIN	
9/30/2025	9/30/2024	TIER 2	New	ADIN	
4/30/2025	9/30/2024	TIER 2	New	CEDARVILLE	
9/30/2027	9/30/2024	TIER 2	New	CEDARVILLE	
9/30/2025	9/30/2024	TIER 2	New	CEDARVILLE	
9/30/2025	9/30/2024	TIER 2	New	CEDARVILLE	
9/30/2027	9/30/2024	GEN	New	CEDARVILLE	
9/30/2027	9/30/2024	GEN	New	CEDARVILLE	

9/30/2027	9/30/2024	GEN	New	CEDARVILLE	
4/30/2025	9/30/2024	GEN	New	CEDARVILLE	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2025	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	
9/30/2027	9/30/2024	GEN	New	ALTURAS	