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Frontier.com

SENT VIA ELECTRONIC MAIL

April 15, 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 Riverside County East Service Area Audit Report

Fadi Daye,

Frontier California Inc. (U-1002-C) and Frontier Communications of the Southwest Inc. (U-1026-C) collectively referred to as ("Frontier") hereby responds to the March 19, 2025, California Public Utilities Commission (Commission) Frontier Riverside County East Service Area Communications Infrastructure Provider (CIP) Audit Report.

I. Records Review

- Inspection records.
- Work order/corrective ticket records
- Third Party Notifications
- Pole Loading Calculation Records
- Inspection and maintenance procedures

II. Field Inspections

III. Field Inspection – Violations List

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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.

- 4061290E
- 40150CWT

Response: Tickets have been issued to resolve nonconformance. See attached "Frontier

GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:

The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.

The lowest pole step on Pole No. 2073720E was located at a height of less than eight feet above an easily climbable foreign structure.

Response: A ticket has been issued to resolve nonconformance. See attached “Frontier Riverside County East Audit Tickets.xls”.

GO 95, Rule 34, Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

Unauthorized foreign attachments were attached on each of the following poles:

- Pole No. 4061291E supported an unauthorized lizard sculpture.
- Pole No. 4199809E supported an unauthorized Neighborhood Watch sign.
- Pole No. 907401D supported an unauthorized sign which read “Se leen las cartas.”

Response: Tickets have been issued to resolve nonconformance. See attached “Frontier Riverside County East 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.

The visibility strips attached to each of the following poles were damaged:

- | | |
|------------|-----------|
| • 239462 | • 906561D |
| • VZ254673 | • 1218902 |
| • CT213834 | • 1188734 |

- 907335D
- 907341D
- 905153D

A guy guard attached to a down guy wire on Pole No. 906561D was damaged.

Response: Tickets have been issued to resolve nonconformance. See attached “Frontier Riverside County East Audit Tickets.xls”.

GO 95, Rule 56.4, Clearances, states in part:

The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall not be less than as specified in Table 2, Case 19.

Table 2, Column C, Case 19 requires guy wires and communications conductors supported on the same pole to maintain a radial clearance of three inches.

A Frontier Communications conductor was in contact with a third-party down guy wire south of Pole No. 906766D.

Response: A ticket has been issued to resolve nonconformance. See attached “Frontier Riverside County East 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.

A Service drop attached to each of the following poles was permanently abandoned:

- 4973480E
- 905155D

Response: Tickets have been issued to resolve nonconformance. See attached “Frontier Riverside County East Audit Tickets.xls”.

GO 95, Rule 92.4-D1 – Exposed Cables and Messengers states in part:

The exposed communications conductors and messengers shall be grounded: At all deadend poles and at intervals not greater than every one-quarter of a mile (1320 feet).

The Frontier messenger wire attached to a dead-end Pole No. 922054D was not grounded.

Response: A ticket has been issued to resolve nonconformance. See attached “Frontier Riverside County East 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)," and "Communication Conductors and Supply Drops" supported on the same pole to be 12 inches.*

Frontier communications conductors were in contact with other communications conductors on or near each of the following poles:

- 4794493E
- 4794486E
- 1641084E
- 4260266E
- 4061290E
- 1992484E
- 1211126D
- 90626D
- 911725D
- 1162CRT
- 4758411E

Response: Tickets have been issued to resolve nonconformance. See attached "Frontier Riverside County East Audit Tickets.xls".

GO 95, Rule 84.4, Clearances, Section (A)(3), states:

Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet

A Frontier service drop attached to Pole No. CT213834 was in contact with the ground in an area accessible to pedestrians only.

Response: A ticket has been issued to resolve nonconformance. See attached "Frontier Riverside County East Audit Tickets.xls".

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 locking mechanism on each of the following underground structures was broken:

- Pedestal 3843
- Pedestal 3818
- The pedestal near [REDACTED] in Blythe.
- The pedestal south of [REDACTED] in Mecca.

- The Handhole east of the intersection of [REDACTED] and [REDACTED] in Mecca.

A pedestal on the southeast corner of [REDACTED] and [REDACTED] in Mecca was missing its cover.

The housing of the pedestal at [REDACTED] was damaged.

The pedestal north of the intersection of [REDACTED] and [REDACTED] could not be closed due to dirt and debris built up around its base.

Response: Tickets have been issued to resolve nonconformance. See attached "Frontier Riverside County East Audit Tickets.xls".

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:

- Pedestal 3843
- Pedestal 3818
- Pedestal 3819
- The pedestal at [REDACTED] in Blythe.
- The pedestal at [REDACTED] in Blythe.
- The pedestal at [REDACTED]
- The pedestal at [REDACTED]
- The pedestal at [REDACTED]
- The pedestal north of the intersection of [REDACTED] and [REDACTED] in Mecca.
- The pedestal south of [REDACTED]
- The pedestal at [REDACTED]

Response: Tickets have been issued to resolve nonconformance. See attached "Frontier Riverside County East Audit Tickets.xls".

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 Handhole FT35626 was unsecured.

Response: A ticket has been issued to resolve nonconformance. See attached "Frontier Riverside County East Audit 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
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cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
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