



1919 McKinney Ave., Dallas, TX 75201
Frontier.com

SENT VIA ELECTRONIC MAIL

July 25, 2025

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

Re: Response to Frontier Kern County West District Audit Report

Dear Fadi Daye,

Frontier California Inc (U-1002-C) ("Frontier") hereby responds to the June 24, 2025 California Public Utilities Commission (Commission) audit report regarding the Kern County West District Communications Infrastructure Provider (CIP) Audit conducted March 24, 2025 to March 28, 2025.

I. Records Review

- Overhead detailed and patrol inspection 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. Records Review – Violations List

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

General Order (GO) 95, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate...

GO 95, Rule 31.1, 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 communication or supply lines and equipment.

From January 2020 to December 2024, Frontier completed 83 overhead work orders beyond Frontier's scheduled due date for corrective action. Additionally, Frontier had 61 open overhead work orders that were past Frontier's scheduled due date for corrective action.

Response: As of July 25, 2025, Frontier completed 53 of the sixty-one past due tickets. The following eight tickets will be completed no later than August 15, 2025: FV-TAFFTCAXF 1153624.CTC, TK904584, TK1798794, TK1798795, TK1798796, TK1798801, TK1798803, TK1806123.

III. Field Inspection

IV. Field Inspection – Violation 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.

A PG&E conduit riser supported on Pole 120572336 was damaged at the public level, exposing the conductor. Frontier did not notify the responsible third-party of the safety hazard.

Response: Ticket T-00469561 was issued to PG&E with a 9/25/2025 due date. See file "CPUC Kern County West Audit Tickets 03.24.25 to 03.28.25". PG&E was sent an email on 6/25/25 communicating the audit finding.

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 Frontier facilities on each of the following poles required maintenance:

- Pole at 14861 Woodward St – a Frontier service drop was touching a broken PG&E

down guy wire.

- CTC 1203859 – Frontier’s facilities on the buddy pole need to be transferred to the new pole
- 120951383 – the Frontier service splice box attached to the pole was left open
- CTC1201787 – Frontier’s facilities on the buddy pole need to be transferred to the new pole
- 120181480 – (1) Frontier’s splice box was damaged, exposing the conductor; (2) there was a damaged clamp supporting bolt on the pole; (3) a rope was being used to support a conductor
- 120499296 – Frontier had a loose bolt on the eye nut [located at the second conductor level starting from the bottom]
- 120499329 – the Frontier ground wire was cut at the public level
- 120499331 – (1) Frontier had multiple hanging or damaged riser straps; (2) additionally, there was an unsecured Frontier terminal box hanging from the wall of an adjacent building at the public level
- 120500351 – Frontier had a broken span guy wire hanging around the pole at the public level
- CTC1203127 – a Frontier service drop was hanging from the conductor and unsecured to the pole at the public level

Response: Tickets were issued for the noted infractions. See file “CPUC Kern County West Audit Tickets 03.24.25 to 03.28.25”.

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 Frontier communications cable attached to each of the following poles was permanently abandoned and should be removed:

- 120572350 – a Frontier service drop was disconnected and hanging from the conductor at the public level
- 120951379 – a Frontier service drop was disconnected and hanging from the conductor at the public level
- 1 Pole S of 120951379 – a disconnected Frontier service drop was hanging from the pole and lying on the ground
- 120951382 – a Frontier service drop was hanging from the conductor and wrapped around a nearby fence
- 120951439 – a disconnected Frontier service drop was wrapped around

- the pole and hanging at the public level
- 120951429 – a Frontier conductor was disconnected and lying on the ground
- 120951433 – a Frontier service drop was disconnected and hanging from the conductor at the public level

Response: Tickets were issued for the noted infractions. See file “CPUC Kern County West Audit Tickets 03.24.25 to 03.28.25”.

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:

- 120951383
- 120499329

Response: Tickets were issued for the noted infractions. See file “CPUC Kern County West Audit Tickets 03.24.25 to 03.28.25”.

GO 95, Rule 84.4 –D, Clearances, From Poles and Crossarms states in part:

Table 1, Case 8, Column B specifies a minimum clearance of 15 inches from center line of pole which is applicable to communication conductors including cables and service drops. Modifications of this basic 15 inches clearance are specified in Rule 37 and by the following provisions where conductors are not on poles jointly used for supporting supply conductors excepting VIII-23 January 2020 Rule 84.4-D1b supply service drop clearance attachments (see Rules 54.8–C2 and 54.8–C3).

The following Frontier communications conductors did not have the minimum required clearance of 15 inches from the center line of a pole to which it was not attached:

- A Frontier communications conductor was touching Pole VZ103754 to which it was not attached.
- A Frontier communications conductor was touching an unmarked pole, located one pole north of VZ103754, to which it was not attached.

Response: Tickets were issued for the noted infractions. See file “CPUC Kern

County West Audit Tickets 03.24.25 to 03.28.25”.

GO 95, Rule 84.8-C3(b), Service Drops, Clearances above Ground and Buildings, Above Ground in Areas Accessible to Pedestrians Only, Residential Premises states in part:

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 communications service drop supported on Pole 120572344 and servicing a nearby home had an above ground vertical clearance of less than 8 feet, 6 inches in a pedestrian accessible area.

Response: Ticket T-00470102 was issued for the noted infraction. See file “CPUC Kern County West Audit Tickets 03.24.25 to 03.28.25”.

GO 95, Rule 84.8-C4, Service Drops, Clearances above Ground and Buildings, From Buildings and Structures states in part:

Service drops are not required to clear the roofs of buildings on the premises served any specified vertical distance. The vertical clearance above buildings on premises other than the one being served shall not be less than 8 feet, except that a reduction to not less than 2 feet is permitted under either of the following conditions.

A Frontier service drop supported on Pole CTC1201787 was touching the roof of the home it was servicing.

Response: Ticket T-00469698 was issued for the noted infraction. See file “CPUC Kern County West Audit Tickets 03.24.25 to 03.28.25”.

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.

The Frontier down guy wire supporting Pole 120951385 was not taut.

Response: Ticket T-00470106 was issued for the noted infraction. See file “CPUC Kern County West Audit Tickets 03.24.25 to 03.28.25”.

GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground:

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 conduit attached to each of the following poles was damaged:

- 110529581
- 120951377

Response: Ticket T-00470108 and T-00470110 were issued for the noted infractions. See file "CPUC Kern County West Audit Tickets 03.24.25 to 03.28.25".

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 following Frontier underground facilities required maintenance:

- The Frontier pedestal adjacent to CTC1202146 had an unsecured/unlocked cover.
- The Frontier pedestal at 1200 4th St had an unsecured/unlocked cover.

Response: Ticket T-00470113 and T-00470117 were issued for the noted infractions. See file "CPUC Kern County West Audit Tickets 03.24.25 to 03.28.25".

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:

Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, CPUC
Jose Lastra, Utilities Engineer, ESRB, SED, CPUC
Jenny Smith, Director Government and Regulatory Affairs, Frontier

No.	Structure ID	Structure Type	Location	Ticket Number
1	110529581	Wood Pole	Lost Hills	T-00470108
4	Pole at 14861 Woodward St	Wood Pole	Lost Hills	T-00469570
4	Pole at 14861 Woodward St	Wood Pole	Lost Hills	T-00469570
5	120572350	Wood Pole	Lost Hills	T-00469829
12	120572344	Wood Pole	Lost Hills	T-00470102
14	120572336	Wood Pole	Lost Hills	T-00469561
15	VZ103754	Wood Pole	Lost Hills	T-00470099
16	1 Pole North of VZ103754	Wood Pole	Lost Hills	T-00470101
18	Pedestal Adjacent to CTC1202146	Pedestal	Lost Hills	T-00470113
21	120951379	Wood Pole	McKittrick	T-00469836
22	1 Pole S of 120951379	Wood Pole	McKittrick	T-00469844
24	120951382	Wood Pole	McKittrick	T-00469850
27	CTC 1203859	Wood Pole	McKittrick	T-00469667
31	120951377	Wood Pole	McKittrick	T-00470110
32	120951385	Wood Pole	McKittrick	T-00470106
34	120951383	Wood Pole	McKittrick	T-00469673
40	120951439	Wood Pole	McKittrick	T-00469857
43	120951429	Wood Pole	McKittrick	T-00469858
45	120951433	Wood Pole	McKittrick	T-00469859
49	CTC1201787	Wood Pole	Buttonwillow	T-00469698
58	120181480	Wood Pole	Buttonwillow	T-00469766
68	120499296	Wood Pole	Taft	T-00469781
76	120499329	Wood Pole	Taft	T-00469785
80	120499331	Wood Pole	Taft	T-00469792
87	1200 4th St	Manhole	Taft	T-00470117
96	120500351	Wood Pole	Taft	T-00469802
101	CTC1203127	Wood Pole	Taft	T-00469812

Violation

The Frontier riser conduit attached to each of the following poles was damaged:

Pole at 14861 Woodward St – a Frontier service drop was touching a broken PG&E down guy wire.

Pole at 14861 Woodward St – a Frontier service drop was touching a broken PG&E down guy wire.

a Frontier service drop was disconnected and hanging from the conductor at the public level

A Frontier communications service drop supported on Pole 120572344 and servicing a nearby home had an above

A PG&E conduit riser supported on Pole 120572336 was damaged at the public level, exposing the conductor

A Frontier communications conductor was touching Pole VZ103754 to which it was not attached.

A Frontier communications conductor was touching an unmarked pole, located one pole north of VZ103754, to which it was not attached.

The Frontier pedestal adjacent to CTC1202146 had an unsecured/unlocked cover.

a Frontier service drop was disconnected and hanging from the conductor at the public level

a disconnected Frontier service drop was hanging from the pole and lying on the ground

a Frontier service drop was hanging from the conductor and wrapped around a nearby fence

Frontier's facilities on the buddy pole need to be transferred to the new pole

The Frontier riser conduit attached to each of the following poles was damaged:

The Frontier down guy wire supporting Pole 120951385 was not taut.

the Frontier service splice box attached to the pole was left open and the ground wire moulding was damaged

disconnected Frontier service drop was wrapped around the pole and hanging at the public level

a Frontier conductor was disconnected and lying on the ground

a Frontier service drop was disconnected and hanging from the conductor at the public level

Frontier's facilities on the buddy pole need to be transferred to the new pole and A Frontier service drop supported

(1) Frontier's splice box was damaged, exposing the conductor; (2) there was a damaged clamp supporting bolt connecting the

Frontier had a loose bolt on the eye nut [located at the second conductor level starting from the bottom]

the Frontier ground wire was cut at the public level and the ground wire moulding was damaged

(1) Frontier had multiple hanging or damaged riser straps; (2) additionally, there was an unsecured Frontier terminal

The Frontier pedestal at 1200 4th St had an unsecured/unlocked cover.

Frontier had a broken span guy wire hanging around the pole at the public level

a Frontier service drop was hanging from the conductor and unsecured to the pole at the public level

Priority Level	Affected Company	Due Date	Inspection Date	HF Tier	TKT Status
3	Frontier	3/25/2028	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
3	PG&E	3/25/2028	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
2B	Frontier	3/25/2026	3/25/2025	General	Logged
2A	PG&E	9/25/2025	3/25/2025	General	Closed
3	Frontier	3/25/2028	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
3	Frontier	3/25/2026	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
2C	Frontier	3/25/2026	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
2C	Frontier	3/25/2026	3/25/2025	General	Logged
2C	Frontier	3/25/2026	3/25/2025	General	Logged
2C	Frontier	3/25/2026	3/25/2025	General	Logged
3	Frontier	3/25/2026	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
2C	Frontier	3/25/2026	3/25/2025	General	Logged
2B	Frontier	3/25/2026	3/25/2025	General	Logged
2C	Frontier	3/25/2026	3/25/2025	General	Logged
3	Frontier	3/25/2028	3/25/2025	General	Logged
2B	Frntier	3/25/2026	3/25/2025	General	Logged
2C	Frontier	3/25/2026	3/25/2025	General	Logged

Frontier Response

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Emailed PG&E on 6/25/2025

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Emailed PG&E on 6/25/2025

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Pole Admin

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Pole Admin

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton

Assigned to Michael Lloyd-Peyton