



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

SENT VIA ELECTRONIC MAIL

August 4, 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 Communication Infrastructure Provider (CIP) Audit of Burney and Fall River Mills region.

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 Burney and Fall River Mills region Communications Infrastructure Provider (CIP) audit conducted from April 14, 2025 through April 18, 2025.

I. Records Review

- Frontier's Inspection & Maintenance Procedures, January 2025
- Frontier's Facility Statistics of Burney and Fall River Mills Region
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the Last 5 Years (February 2020 – January 2025)
- Most Recent Work Orders Conducted in the Last 5 Years (February 2020 – January 2025)
- Pole Loading Calculations Conducted in the Last 5 Years (February 2020 – January 2025)
- Safety Hazard Notifications Frontier Received and Sent to Third Parties in the Last 5 Years (February 2020 – January 2025)
- Employee statistics
- Records for Intrusive Pole Inspections Conducted in the Last 5 Years (February 2020 – January 2025)
- New Construction Projects Completed in the Last 12 Months

II. Records Violations

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

1. GO 95, Rule 18-B1(a), Maintenance Programs states in part:

“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’s review of Frontier’s work orders from February 2020 through January 2025 found that 165 out of 1,388 (or 12%) pending work orders are overdue and 84 out of 448 (or 19%) closed work orders were completed late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 249 late work orders by hazard level.

Table 1: Late Work Orders

Hazard Level	Late-Pending Work Orders as of 1/21/25	Late-Closed Work Orders	Total Late Work Orders
1	N/A	1	1
2a	2	1	3
2b	123	75	198
2c	40	7	47
Total	165	84	249

Frontier must provide ESRB with its corrective action plan to complete the 165 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Response: As of August 1, 2025, 40 of the 165 late pending tickets have been closed. Closed tickets are highlighted in red, see file “Late Pending Ticket Details Burney April Audit Data Request.xls”. The remaining 125 tickets are scheduled for completion by August 31, 2025. Frontier will continue to balance GO 95 ticket assignments based on indicated priority levels, resource needs, along with budget requirements.

Table 2 below identifies the most overdue non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
1	TK3182922	529
2a	TK3153937	83
2b	TK1808665	1,000
2c	TK1541058	643

Frontier identified work order #TK3182922 on September 17, 2023, to repair a broken pole with a required finish date of September 18, 2023. The work order was completed on February 28, 2025 indicating it was 529 days past the required finish date of September 18, 2023.

Frontier identified work order #TK3153937 on August 20, 2023, for a low hanging conductor. According to Frontier maintenance procedures, a 2a priority work order requires completion within 6 months. This would require the work order to be completed by February 20, 2024. The work order spreadsheet incorrectly listed a target finish date of August 21, 2023. The work order was completed on May 13, 2024 indicating it was 83 days past the required finish date of February 20, 2024.

Frontier identified work order #TK1808665 on November 12, 2020, to remove an abandoned service drop with a required finish date of November 24, 2021. The work order was completed on August 20, 2024 indicating it was 1,000 days past the required finish date of August 20, 2024.

Frontier identified work order #TK1541058 on April 29, 2020, for an unauthorized attachment with a required finish date of April 29, 2023. Frontier has not yet completed the work.

The work order spreadsheet also had four work orders with a level 4 priority. The Frontier Inspection and Maintenance Procedure does not reference or mention what a level 4 priority level indicates. A level 4 priority work order must be explained/defined in the Frontier Inspection and Maintenance Procedure.

Response: Much of the Burney and Fall River Mills region is rural and remote; therefore, Frontier

may, at times, weigh safety risks for higher traffic areas when determining ticket completion prioritization. This was the case for ticket #TK1808665. The abandoned drop was located in an extremely remote forest area in Frontier's Burney exchange and did not pose a human safety concern. Frontier does review ticket priorities and can reassign priority levels when appropriate. #TK1541058 is prioritized and will be completed by August 31, 2025. Frontier established an internal Level 4 priority for issues that pose minimal safety risks beyond Level 3, as defined under GO 95, Rule 18. Level 4 designates opportunity maintenance during construction activity at the same pole. The corrective action date is set to a default of 1/1/2050. Frontier California's Outside Plant Maintenance, Inspection and Repair Programs has been updated with a description off Level 4 and also to reflect the new outside plant maintenance and repair ticket system, Sitetracker implemented as of June 2025. See file "2025 August Frontier Confidential Inspection Maintenance Procedures.pdf".

2.0 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."

The inspection list spreadsheet did not include any inspection of Frontier's underground facilities between February 2020 and January 2025. Frontier is required to inspect underground facilities frequently and thoroughly for the purpose of insuring that they are in good condition.

Response: 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. 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 inspection.

III. Field Inspection

IV. Field Inspection Violations

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."

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.

A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard...”

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

Table 4: GO 95, Rule 31.1 Findings

Location #	Findings
18	Facilities need to be transferred to new pole.
20	There was a broken guy wire left on pole.
22	Facilities need to be transferred to new pole.
24	Facilities need to be transferred to new pole.
31	Conductor is not securely attached to pole.
31	Pole has woodpecker damage.
40	There was a broken guy wire left on pole.
43	Facilities need to be transferred to new pole.
43	Pole is leaning/broken.
45	Pole is leaning.
69	Conductor is not securely attached to pole.
70	Facilities need to be transferred to new pole.

75	Terminal is missing a cover.
76	Facilities need to be transferred to new pole.
77	Facilities need to be transferred to new pole.
78	Facilities need to be transferred to new pole.

Response: Tickets were issued for the noted infractions. See file “CPUC Audit Tickets issued July 2025.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 5: GO 95, Rule 31.6 Findings

Location #	Findings
4	There was an abandoned service drop.
8	There was an abandoned service drop.
10	There was an abandoned service drop.
25	There was an abandoned service drop.
40	There was an abandoned service drop.
86	There was an abandoned service drop.
96	There was an abandoned service drop.
102	There was an abandoned service drop.

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

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

“Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light 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.

Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner’s or owners’ consent.”

ESRB’s finding related to the above rule is listed in Table 6:

Table 6: GO 95, Rule 34 Finding

Location #	Finding
3	There were abandoned foreign facilities attached to the pole.

Response: Ticket #T-00477360 was issued for the noted infraction. See file “CPUC Audit Tickets issued July 2025.xls”.

4. GO 95, Rule 35, Vegetation Management states in part:

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. 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). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule.”

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

Table 7: GO 95, Rule 35 Findings

Location #	Findings
39	There was vegetation strain on the conductor.
47	There was vegetation strain on the conductor.

Response: Tickets T-00477383 & T-00477389 were issued for the noted infractions. See file "CPUC Audit Tickets issued July 2025.xls".

5. GO 95, Rule 38, Minimum Clearances 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 deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Case 8-15, inclusive..."

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

Table 8: GO 95, Rule 38 Findings

Location #	Findings
28	There was a guy wire in contact with a secondary electrical conductor. Table 2 requires a minimum clearance of 3 inches between guys and spans wires passing conductors supported on the same poles.
48	There Frontier conductor was in contact with the electrical guy wire. Table 2 requires a minimum clearance of 3 inches between guys and spans wires passing conductors supported on the same poles.
64	There was a Frontier service drop in contact with another communications service drop. Table 2 requires a minimum clearance of 12 inches between service drops supported on the same pole.

Response: Tickets T-00477378, T-00477390, T-00477398 & T-00477400 were issued for the noted infractions. See file "CPUC Audit Tickets issued July 2025.xls".

6. 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
4	Guy wire was missing a guy guard.
27	Guy wire was missing a guy guard.
28	Guy wire was missing a guy guard.
34	Guy wire was missing a guy guard.
37	Guy guard was broken.
53	Guy wire was missing a guy guard.

Response: Tickets were issued for the noted infractions. See file "CPUC Audit Tickets issued July 2025.xls".

7. GO 95, Rule 84.7A, Climbing Space states:

"Climbing space shall be provided 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 shall be maintained in the same position on the pole for minimum vertical distance of 4 feet above and below each conductor level through which it passes, excepting that where a cable is attached to a crossarm or a pole with the cable less than 9 or 15 inches from the center line of the pole supporting conductors on line arms (no buck arm construction involved) in accordance with the provisions of Rules 84.4–D1 or 87.4–C3, the 4 foot vertical distance may be reduced to not less than 3 feet.

The position of the climbing space shall not be shifted more than 90 degrees around the pole within a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.

The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–A5."

ESRB's finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 84.7A Finding

Location #	Finding
39	Vegetation impedes climbing space.

Response: Ticket # T-00477383 was issued for the noted infraction. See file "CPUC Audit Tickets issued July 2025.xls".

8. GO 95, Rule 84.6B, 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 11:

Table 11: GO 95, Rule 84.6B Findings

Location #	Findings
3	There was an exposed ground wire.
6	There was an exposed ground wire.
9	There was an exposed ground wire.
19	There was broken ground moulding.

43	There was an exposed ground wire.
75	There was an exposed ground wire.
89	There was an exposed ground wire.

Response: Tickets were issued for the noted infractions. See file “CPUC Audit Tickets issued July 2025.xls”.

9. GO 95, Rule 84.8C(2)(b), Residential Premises states:

“Over residential driveways, lanes or over property accessible to vehicles, service drops shall not be less than 12 feet.”

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

Table 12: GO 95, Rule 84.8C(2)(b) Finding

Location #	Finding
63	There was a low service drop.

Response: Ticket # T-00477397 was issued for the noted infraction. See file “CPUC Audit Tickets issued July 2025.xls”.

10. 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 finding related to the above rule is listed in Table 13:

Table 13: GO 95, Rule 86.2 Finding

Location #	Finding
22	There was a loose guy wire.

Response: Ticket # T-00477374 was issued for the noted infraction. See file “CPUC Audit Tickets issued July 2025.xls”.

11. 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

a) gr 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 14:

Table 14: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
5	Riser was broken.
6	Riser was broken.
17	There was no riser for conductor on pole.
69	There was no riser for conductor on pole.
96	There was no riser for conductor on pole.
98	There was no riser for conductor on pole.

Response: Tickets were issued for the noted infractions. See file “CPUC Audit Tickets issued July 2025.xls”.

12. 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.”

ESRB’s finding related to the above rule is listed in Table 15:

Table 15: GO 128, Rule 17.1 Finding

Location #	Finding
5	There was an unburied conductor at location 5.

Response: Ticket # T-00477362 was issued for the noted infraction. See file “CPUC Audit Tickets issued July 2025.xls”.

13. 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 findings related to the above rule are listed in Table 16:

Table 16: GO 128, Rule 17.8 Findings

Location #	Findings
1	No mark of ownership on B-box.
2	No mark of ownership on AFC box.
33	No mark of ownership on pedestal.
35	No mark of ownership on pedestal.
36	No mark of ownership on B-box.
38	No mark of ownership on pedestal.
44	No mark of ownership on pedestal.
54	No mark of ownership on pedestal.
67	No mark of ownership on pedestal.

68	No mark of ownership on pedestal.
97	No mark of ownership on pedestal.
99	No mark of ownership on pedestal.
105	No mark of ownership on pedestal.

Response: Tickets were issued for the noted infractions. See file “CPUC Audit Tickets issued July 2025.xls”.

V. Observations

1. 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.”

ESRB’s findings related to the above Rule are listed in Table 17:

Table 17: GO 95, Rule 18-A Findings

Location #	Findings
6	Unauthorized attachment due to abandoned facilities left on electrical pole.
13	Unauthorized attachment due to abandoned facilities left on electrical pole.
16	Cable TV guy wire was loose.
22	Unauthorized attachment due to abandoned facilities left on electrical pole.
25	Unauthorized attachment due to abandoned facilities left on electrical pole.
42	Electrical ground wire was exposed.

- 46 Electrical guy wire was loose.
- 50 Unauthorized attachment due to abandoned facilities left on electrical pole.
- 61 Cable TV ground wire was exposed.
- 64 Cable TV service drop was in contact with Frontier service drop.
- 64 Pole was decayed and had woodpecker damage.
- 69 Cable TV conductor had no riser and was not attached to pole.
- 70 Cable TV guy wire was loose
- 71 Cable TV had an abandoned service drop
- 72 Electrical pole was leaning.
- 74 Cable TV had an abandoned service drop.
- 75 Cable TV conductor had no riser.
- 76 Cable TV needs to transfer facilities
- 77 Cable TV needs to transfer facilities
- 78 Cable TV needs to transfer facilities.

Response: Tickets were issued for the noted infractions. See file "CPUC Audit Tickets issued July 2025.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
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC
Rafael Herranz, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services, Analyst, ESRB, SED, CPUC
Jenny Smith, Director Government and Regulatory Affairs, Frontier



Frontier California's Outside Plant Maintenance, Inspection, and Repair Programs

The maintenance of OSP is a high priority for Frontier California. Frontier California has a variety of programs to ensure that its outside plant is kept in good working condition.

Maintenance Program

[REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

2. Pole Maintenance

[REDACTED]



Quality Inspection Program

[REDACTED]

[REDACTED]

GO 95 Inspection and Maintenance Program

GO 95 sets forth design, construction, maintenance and safety requirements for electrical and communications aerial plant. GO 95, Rule 18, directs utilities to correct nonconformances based upon a three priority levels: Priority Level 1, 2 or 3. Priority Level 1 issues are those that create an “immediate safety and/or reliability risk with high probability for significant impact.” For these issues, GO 95 requires companies to “take action immediately (within 24 hours), either by fully repairing the condition, or by temporarily repairing and reclassifying the condition to a lower priority.”

Priority Level 2 conditions pose “variable (non-immediate high to low) safety and/or reliability risk.” Corrective action for these conditions must be taken (a) within 6 months for nonconformances that “compromise worker safety” or “create a fire risk” and are located in an Extreme High Fire Threat Zone (Tier 3), (b) within 12 months in a Very High Fire Threat Zone (Tier 2) and (c) within 36 months for all other Level 2 nonconformances. These deadlines run from the date the nonconformance is first identified.

Priority Level 3 items are an “acceptable safety and/or reliability risk” and action should be taken “as appropriate” within 60 months.

[REDACTED]



For all GO 95 conditions, correction times may be extended under reasonable circumstances, such as lack of access to the area, or where a permit must be obtained, or where an emergency exists, such as a fire or severe weather condition.

The following explains Frontier California's protocols regarding GO 95:

1. Identifying Conditions That Need Remediation

[REDACTED]

2. Categorizing Nonconforming Conditions for Remediation and Tracking To Ensure Repair By Deadline

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

Frontier California Also Maintains Its Underground Facilities In Accordance With General Order 128 (“GO 128”)

GO 128 was enacted to “formulate, for the State of California, uniform requirements for underground electrical supply and communication systems, the application of which will insure adequate service and secure safety to all persons engaged in the construction, maintenance, operation or use of underground systems and to the public in general.” GO 128, Rule 11. It applies to underground electrical supply and communication systems used in connection with public utility service. It requires that these systems be maintained in “such condition as to secure safety to workmen and the public in general.” GO 128, Rule 12.2.

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.

[REDACTED]

No.	Structure ID	Site	Structure Type
1	N/A	B Box	B-Box
2		AFC Box	AFC Box
3	N/A	101519160 CU2496-2	Pole
4	N/A	N/A	Pole
5	N/A	N/A	Pole
6	120193097	120193097	Pole
8	658	101519105 CU04189-3	Pole
9	657	FRML CU-04823-2	Pole
10	120551258	101519104 CU04189-2	Pole
13	T348	FRML CU-0096-12	Pole
16	8367	FRML CU1467-5	Pole
17	110469335	FRML CU-1467-2	Pole
18	N/A	N/A	Pole
19	N/A	N/A	Pole
20	121110592	FRML CU-0092-15	Pole
22	110295962	PG110007	Pole
24	121317078	BRNY PG200090FF	Pole
25	N/A	FRML CU-1023-1	Pole
27	N/A	FRML CU-03822-3	Pole
28	39	FRML CU-03822-2	Pole
31	45662	45662	Pole
33	N/A	N/A	Pole
34	45814	45814	Pole
35	N/A	N/A	Pedestal
36	N/A	N/A	B-Box
37	N/A	MCLD 1	Pole
38	N/A	N/A	Pedestal
39	N/A	MCLD 4	Pole
40	N/A	N/A	Pole
42	06239002-63505	MCC_D-5 UNK-ID POLE 4	Pole
43	06239002-63504	MCLD M-4040	Pole
44	N/A	N/A	Pedestal
45	N/A	N/A	Pole
46	06239002-62501	06239002-62501	Pole
47	N/A	MCLD M-2910	Pole
48	06239002-62211	MCLD M-2909	Pole
50	06239003-17714	MCC_B-5 UNK-ID POLE 8	Pole
53	N/A	MCLD 146	Pole
54	N/A	N/A	Pedestal
61	121180416	121180416	Pole
63	121288110	CU-0963-1	Pole
64A	121288111	BRNY CU-0233-23	Pole
64B	121288111	BRNY CU-0233-23	Pole
67	N/A	N/A	Pedestal
68	N/A	N/A	Pedestal
69A	121946354	121946354	Pole

69B	121946354	121946354	Pole
70A	121533184	121533184	Pole
70B	121533184	121533184	Pole
71	121288029	121288029	Pole
72	121274646	121274646	Pole
74	121274637	BRNY BUR_2092-562-1 UNK-ID POLE 5	Pole
75A	N/A	N/A	Pole
75B	N/A	N/A	Pole
76A	110453081	110453081	Pole
76B	110453081	110453081	Pole
77A	121523959	121523959	Pole
77B	121523959	121523959	Pole
78A	121524070	121524070	Pole
78B	121524070	121524070	Pole
86	121612710	MNCK PG235123FF	Pole
89	121612707	121612707	Pole
96	121545798	121545798	Pole
97	N/A	N/A	Pedestal
98	121202143	121202143	Pole
99	N/A	N/A	Pedestal
102	T254	T254	Pole
105	N/A	N/A	Pedestal

Location	Ticket Number
McArthur	T-00477359
McArthur	T-00477359
McArthur	T-00477360
McArthur	T-00477361
McArthur	T-00477362
McArthur	T-00477363
McArthur	T-00477364
McArthur	T-00477365
McArthur	T-00477366
Fall River Mills	T-00477367
Fall River Mills	T-00477368
Fall River Mills	T-00477370
Fall River Mills	T-00477371
Fall River Mills	T-00477372
Fall River Mills	T-00477373
Fall River Mills	T-00477374
Fall River Mills	T-00477375
Fall River Mills	T-00477376
Fall River Mills	T-00477377
Fall River Mills	T-00477378
Fall River Mills	T-00477379
Burney	T-00477380
Burney	T-00477381
Burney	T-00477381
Burney	T-00477381
McCloud	T-00477382
McCloud	T-00477382
McCloud	T-00477383
McCloud	T-00477384
McCloud	T-00477385
McCloud	T-00477386
McCloud	T-00477386
McCloud	T-00477387
McCloud	T-00477388
McCloud	T-00477389
McCloud	T-00477390
McCloud	T-00477391
McCloud	T-00477394
McCloud	T-00477394
Burney	T-00477395
Burney	T-00477397
Burney	T-00477398
Burney	T-00477400
Burney	T-00477404
Burney	T-00477406
Burney	T-00477407

Burney	T-00477409
Burney	T-00477411
Burney	T-00477412
Burney	T-00477413
Burney	T-00477414
Burney	T-00477415
Burney	T-00477416
Burney	T-00477417
Burney	T-00477420
Burney	T-00477424
Burney	T-00477433
Burney	T-00477434
Burney	T-00477922
Burney	T-00477923
Burney	T-00477924
Burney	T-00477925
Burney	T-00477926
Burney	T-00477926
Burney	T-00477927
Burney	T-00477927
Burney	T-00477928
Burney	T-00477929

Violation	Priority Level
No mark of ownership on B-box.	3
No mark of ownership on AFC box.	3
There were abandoned foreign facilities attached to the pole. There was an exposed ground wire.	2C
There was an abandoned service drop. Guy wire was missing a guy guard.	2C
Riser was broken. There was an unburied conductor	2C
There was an exposed ground wire. Riser was broken. Unauthorized attachment due to abandoned facilities	2C
There was an abandoned service drop.	2C
There was an exposed ground wire.	3
There was an abandoned service drop.	3
Unauthorized attachment due to abandoned facilities left on electrical pole.	2C
Cable TV guy wire was loose.	2C
There was no riser for conductor on pole.	3
Facilities need to be transferred to new pole	NORMAL
There was broken ground moulding.	2C
There was a broken guy wire left on pole.	2C
Facilities need to be transferred to new pole There was a loose guy wire. Unauthorized attachment due to abandoned facilities	NORMAL
Facilities need to be transferred to new pole	NORMAL
There was an abandoned service drop. Unauthorized attachment due to abandoned facilities	2C
Guy wire was missing a guy guard.	3
There was a guy wire in contact with a secondary electrical conductor. Table 2 requires a minimum 12 inch clearance.	2B
Conductor is not securely attached to pole. Pole has woodpecker damage.	2B
No mark of ownership on pedestal.	3
Guy wire was missing a guy guard.	3
No mark of ownership on pedestal.	3
No mark of ownership on pedestal.	3
Guy wire was missing a guy guard.	3
No mark of ownership on pedestal.	3
There was vegetation strain on the conductor. Vegetation impedes climbing space.	2B
There was a broken guy wire left on pole. There was an abandoned service drop.	2B
Electrical ground wire was exposed.	3
Facilities need to be transferred to new pole. Pole is leaning/broken. There was an exposed ground wire.	NORMAL
No mark of ownership on pedestal.	3
Pole is leaning.	2B
Electrical guy wire was loose.	2C
There was vegetation strain on the conductor.	2B
There was a guy wire in contact with a secondary electrical conductor. Table 2 requires a minimum 12 inch clearance.	2C
Unauthorized attachment due to abandoned facilities left on electrical pole	2C
Guy wire was missing a guy guard.	2C
No mark of ownership on pedestal.	2C
Cable TV ground wire was exposed.	2C
There was a low service drop.	2C
There was a guy wire in contact with a secondary electrical conductor. Table 2 requires a minimum 12 inch clearance.	2B
There was a guy wire in contact with a secondary electrical conductor. Table 2 requires a minimum 12 inch clearance.	2C
No mark of ownership on pedestal.	2C
No mark of ownership on pedestal.	2C
Conductor is not securely attached to pole. There was no riser for conductor on pole. Cable TV facilities	3

Conductor is not securely attached to pole. There was no riser for conductor on pole. Cable	3
Facilities need to be transferred to new pole. Cable TV guy wire was loose.	NORMAL
Facilities need to be transferred to new pole. Cable TV guy wire was loose.	2C
Cable TV had an abandoned service drop.	2C
Electrical pole was leaning.	2B
Cable TV had an abandoned service drop.	2C
Terminal is missing a cover. There was an exposed ground wire. Cable TV conductor had no r	2B
Terminal is missing a cover. There was an exposed ground wire. Cable TV conductor had no r	2C
Facilities need to be transferred to new pole. Cable TV needs to transfer facilities.	NORMAL
Facilities need to be transferred to new pole. Cable TV needs to transfer facilities.	NORMAL
Facilities need to be transferred to new pole. Cable TV needs to transfer facilities.	NORMAL
Facilities need to be transferred to new pole. Cable TV needs to transfer facilities.	NORMAL
Facilities need to be transferred to new pole. Cable TV needs to transfer facilities.	NORMAL
Facilities need to be transferred to new pole. Cable TV needs to transfer facilities.	NORMAL
There was an abandoned service drop.	2C
There was an exposed ground wire.	2C
There was an abandoned service drop. There was no riser for conductor on pole.	2C
No mark of ownership on pedestal.	2C
There was no riser for conductor on pole.	2C
No mark of ownership on pedestal.	2C
There was an abandoned service drop.	2C
No mark of ownership on pedestal.	2C

Affected Company	Due Date	Inspection Date	HF Tier	TKT Status
FRONTIER	4/18/2030	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2030	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2030	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2030	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
ZITO MEDIA	7/18/2025	4/18/2025	GEN	CLOSED
FRONTIER	4/18/2030	4/18/2025	GEN	LOGGED
	4/18/2026	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2028	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2026	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2026	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2028	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2026	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2026	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2026	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2026	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2026	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2026	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2026	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2026	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2028	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2028	4/18/2025	TIER 2	LOGGED
ZITO MEDIA	7/18/2025	4/18/2025	TIER 2	CLOSED
FRONTIER	4/18/2028	4/18/2025	GEN	LOGGED
FRONTIER	4/18/2026	4/18/2025	TIER 2	LOGGED
ZITO MEDIA	7/18/2025	4/18/2025	TIER 2	CLOSED
FRONTIER	4/18/2028	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2028	4/18/2025	TIER 2	LOGGED
FRONTIER	4/18/2030	4/18/2025	GEN	LOGGED

[illegible]