



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

SENT VIA ELECTRONIC MAIL

September 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 San Bernardino East Metropolitan District Audit Report

Dear Fadi Daye,

Frontier California Inc (U-1002-C) ("Frontier") hereby responds to the September 3, 2025 California Public Utilities Commission (Commission) audit report regarding the San Bernardino East Metropolitan District Communications Infrastructure Provider (CIP) Audit conducted July 7- 11, 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. Field Inspection

III. Field Inspection – Violations List

ESRB observed the following violations during the field inspections portion of the audit:

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:

- The Frontier lashing wire supported on pole 1714996E was broken.
- The Frontier communication span supported on pole CIT37130 was attached to a third-party communication conductor via a rope.
- The Frontier ground wire attached to pole located at [REDACTED] Ave was damaged.
- A Frontier pole located at [REDACTED] Blvd had a rope tied around the pole.
- The Frontier service drop was not properly secured to pole 7407BV.

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro tickets.xls".

A damaged visibility strip was observed on each of the following poles:

- [REDACTED] St
- [REDACTED] St

Response: Tickets were issued for the noted infractions. See the file "Confidential CA2025-1328 San Bernardino East Metro.xls".

Incomplete pole transfer on each of the following poles:

- | | | |
|------------|------------|------------|
| • 1714999E | • 4631047E | • 1714995E |
| • 12690BV | • 3713BV | • 1056841E |
| • 4879008E | • 4879009E | • 1588994E |

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro tickets.xls".

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 each of the following poles was located at a height less than eight feet:

- [REDACTED] Blvd
- [REDACTED] St

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro tickets.xls".

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

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).

A Frontier communication conductor attached to each of the following poles was strained by vegetation:

- 1261352E
- 405487E
- 1818829E
- 405486E
- 405488E
- 4323899E

The Frontier service drop attached to Pole 4450226E was strained by a tree branch.

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro tickets.xls".

GO 95, Rule 87.7-D1, 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 casing on pole 1818829E was missing.

Response: Ticket # T-00489855 was issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro 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 conductor was in contact with a third-party communications conductor on or near each of the following poles:

- 405489E
- CIT37131

A Frontier communications service drop on Pole 4450226E was in contact with a third-party communication service drop.

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro 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:

- 1884601E
- 4323900E
- GT140867
- CIT37129
- 1056803E
- [REDACTED] St.
- 4323899E
- 2042510E

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro 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.

Abandoned service drops were observed on or near the following poles:

- 1884601E
- 709873E
- [REDACTED] St.
- 1261353E
- 4691105E
- [REDACTED] Ave
- 405486E
- [REDACTED] St.
- 1215193E
- F15033Y
- 2042510E
- [REDACTED]
- Dr.
- 1056842E
- 4323900E

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro tickets.xls".

GO 95, Rule 86.9 - Guy Marker (Guy Guard), states in part:

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.

The marker (guard) on the down guy wire supporting each of the following poles was missing:

- 1714955E
- [REDACTED] St
- 2042510E

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro tickets.xls".

GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 8, Column D requires the vertical separation between secondary, and communications conductors supported on the same pole to be not less than 48 inches.

Frontier's service drop was in contact with an SCE's secondary service drop on Pole 1056803E.

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro tickets.xls".

GO 95, Rule 84.4-A6, Clearances, Across or Along Public Thoroughfares, states in part: *Communication conductors over or across public thoroughfares shall have a clearance of 18 feet above ground.*

- The above ground clearance of a Frontier conductor attached to Pole 2250603E was approximately 14 feet over a public thoroughfare.
- The above ground clearance of a Frontier conductor attached to Pole 4323899E was approximately 14 feet over a public thoroughfare.
- The above ground clearance of a Frontier conductor attached to Pole 549381E was approximately 14 feet over a public thoroughfare.

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro 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 following facilities required maintenance:

- The cover of the underground vault located in front of [REDACTED] St was corroded.
- The cover of the pedestal T8167A was damaged.
- The cover of the pedestal T8169A was damaged.

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro tickets.xls".

Each of the following Frontier handhole covers was missing bolts (not properly secured):

- FT2055202
- FT2055203
- FT2055204
- H2051
- H2052

Response: Tickets were issued for the noted infractions. See the file "CA2025-1328 San Bernardino East Metro 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:

Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, CPUC
Majed Ibrahim, Senior Utilities Engineer Supervisor, ESRB, SED, CPUC
Stacey Ocampo, Utilities Engineer, ESRB, SED, CPUC
SM Arafat Kamal, Utilities Engineer, ESRB, SED, CPUC
Jenny Smith, Director Government and Regulatory Affairs, Frontier