



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

SENT VIA ELECTRONIC MAIL

January 6, 2026

Majed Ibrahim, P.E.  
Senior Utilities Engineer, Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Re: Response to Frontier East Los Angeles County Audit Report.

Dear Majed Ibrahim,

Frontier California Inc (U-1002-C) ("Frontier") hereby responds to the December 5, 2025, California Public Utilities Commission (Commission) audit report regarding the East Los Angeles County Communications Infrastructure Provider Audit conducted October 6 - 10, 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:

***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.*

Frontier's records indicated that from August 2024 to August 2025, Frontier completed 151 overhead work orders past Frontier's scheduled due date for corrective action.

**Response:** The 151 work orders completed past the scheduled due date were shared with the operations team along with a reminder of required Priority Level correction intervals outlined in Frontier's maintenance procedures.

### III. Field Inspection

### IV. 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:

- Pole No. 2180679E – the lashing wire supported on the pole was broken.
- Pole No. 2497MA – riser not properly secured to pole.
- Pole No. GT61398 - the Frontier service drop was not properly secured to pole.
- Pole No. 810157E – incomplete pole transfer.
- Pole No. 1180027E – the down guy anchor supporting the pole was buried.

**Response:** Repair tickets issued for the noted infractions. See the file "East LA County Audit Tickets Issued.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 No. 1892571E was located at a height less than eight feet:

**Response:** Repair ticket T-00546876 issued. See the file "East LA County Audit Tickets Issued.xls".

***GO 95, Rule 84.4-D4a [Clearances] From Nonclimbable Street Lighting or Traffic Signal Poles or Standards (including mastarms, brackets, and lighting fixtures) states:***

*When passing street lighting, traffic signal poles or standards (including mastarms, brackets and lighting fixtures) a clearance of 12 inches, as specified in Table 1, Case 10, Column B, may be reduced when suitable insulation for the highest voltage of open wire involved and mechanical protection from abrasion is provided where necessary. Such mechanical protection shall extend not less than 15 inches in each direction from centerline of pole,*

*standard, attaching mastarm or fixture, whether passing above, below or alongside.*

A Frontier communications conductor attached to Pole No. GT254292 was in contact with a streetlight pole.

**Response:** Repair ticket T-00546734 issued. See the file "East LA County Audit Tickets Issued.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:

- Pole No. 1525651E
- Pole No. 1525663E
- Pole No. 2269570E
- Pole No. 1224108E
- Pole No. 3420CWT

**Response:** Repair tickets issued for the noted infractions. See the file "East LA County Audit Tickets Issued.xls".

The Frontier service drop attached to each of the following poles was strained by vegetation:

- Pole No. 1525662E
- Pole No. 761756E
- Pole No. 1224107E

**Response:** Repair tickets issued for the noted infractions. See the file "East LA County Audit Tickets Issued.xls".

**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.*

*An unauthorized camera was attached to Pole No. 1180029E.*

**Response:** Ticket T-00546741 was issued for the noted infraction. See the file "East LA County Audit Tickets Issued.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.*

Permanently abandoned service drops were observed on or near the following poles:

- 1525663E
- G14778Y
- 714713E
- 4809111E
- 1155607E
- E74646Y
- 1290195E
- 1290194E
- 5136MA
- 2889MA
- 4377MA-1
- 2886MA
- 1504MA
- 2127MA

**Response:** Repair tickets issued for the noted infractions. See the file "East LA County Audit Tickets Issued.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.***

A Frontier communications service drop was in contact with a third-party communications service drop on or near each of the following poles:

- Pole No. 2471MA
- Pole No. 1224108E
- Pole No. 458711E

**Response:** Repair tickets issued for the noted infractions. See the file "East LA County Audit Tickets Issued.xls".

A Frontier communications conductor supported on each of the following poles had less than 12 inches of vertical clearance from a third-party communications conductors supported on the same pole:

- Pole No. 1503MA
- Pole No. E10207Y

A Frontier communications conductor on Pole No. 4502932E was in contact with a third-party communication service drop.

**Response:** Repair tickets issued for the noted infractions. See the file "East LA County Audit Tickets Issued.xls".

***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 Pole No. 4103MA-2 was damaged.

**Response:** Repair ticket T-00546811 was issued for the noted infraction. See the file "East LA County Audit Tickets Issued.xls".

**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 each of the following poles and servicing a nearby home had an above ground vertical clearance of less than 8 feet, 6 inches in a pedestrian accessible area:

- Pole No. 1054016E
- Pole No. 1054014E

**Response:** Repair tickets issued for the noted infractions. See the file "East LA County Audit Tickets Issued.xls".

**GO 95, Rule 84.7-A, Climbing Space, states in part:**

*Climbing space shall be maintained 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 on Pole No. 1224105E was obstructed by vegetation.

**Response:** Repair ticket T-00546857 was issued for the noted infraction. See the file "East LA County Audit Tickets Issued.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 a SCE's secondary service drop on Pole No. 1525662E.

**Response:** Repair ticket T-00546613 was issued for the noted infraction. See the file "East LA County Audit Tickets Issued.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 pole box Structure No. PB158E was damaged and corroded.
- The cover of the pole box Structure No. PB159E was damaged and corroded.
- The casing of Handhole Structure No. 2423204 was damaged.

**Response:** Repair tickets issued for the noted infractions. See the file “East LA County Audit Tickets Issued.xls”.

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

- Manhole Structure No. 410E
- Pole Box Structure No. PB158E
- Pole box Structure No. PB159E
- Handhole Structure No. 2423205
- Handhole Structure No. 2423206

**Response:** Repair tickets issued for the noted infractions. See the file “East LA County Audit Tickets Issued.xls”.

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

Sincerely,

/s/ Judy Geise  
Manager, Regulatory  
Frontier  
[judy.geise@ftr.com](mailto:judy.geise@ftr.com)

Attachment

cc:

Leslie Palmer, Deputy Executive Director for Safety Enforcement,  
Safety Policy and Water, CPUC  
Eric Wu, Program Manager, ESRB, CPUC  
Stacey Ocampo, Utilities Engineer, ESRB, SED, CPUC  
Jenny Smith, Director Government and Regulatory Affairs, Frontier

No.	Ticket Number	Structure Type	Location	NEW OR EXISTING
1	T-00546553	Pole	Pomona	NEW
4	T-00546613	Pole	Pomona	NEW
5	T-00546614	Pole	Pomona	NEW
6	T-00546615	Pole	Pomona	NEW
9	T-00546616	Pole	Pomona	NEW
11	T-00546803	Pole	Pomona	NEW
19	T-00546727	Pole	Claremont	NEW
26	T-00546734	Pole	Claremont	NEW
29	T-00548708	Pole	Glendora	NEW
36	T-00244485	Pole	Glendora	EXISTING
40	T-00546740	Pole	Glendora	NEW
43	T-00546741	Pole	Covina	NEW
49	T-00546745	Pole	Covina	NEW
52	T-00546751	Pole	Covina	NEW
53	T-00055622	Pole	Covina	EXISTING
54	T-00546756	Pole	Covina	NEW
67	T-00546762	Pole	Baldwin Park	NEW
68	T-00546759	Pole	Baldwin Park	NEW
70	T-00546780	Pole	Azusa	NEW
71	T-00546788	Pole	Azusa	NEW
74	T-00546790	Pole	Azusa	NEW
76	T-00546792	Pole	Azusa	NEW
77	T-00546799	Pole	Azusa	NEW
78	T-00546797	Pole	Azusa	NEW
79	T-00546817	Pole	Azusa	NEW
81	T-00546818	Pole	Azusa	NEW
82	T-00546811	Pole	Azusa	NEW
84	T-00546855	Pole	Azusa	NEW
86	T-00546856	Pole	Arcadia	NEW
87	T-00546857	Pole	Arcadia	NEW
90	T-00546858	Pole	Arcadia	NEW
91	T-00546859	Pole	Arcadia	NEW
98	T-00546860	Pole	Arcadia	NEW
106	T-00546877	Pole	Monrovia	NEW
111	T-00546878	Pole	Monrovia	NEW
124	T-00546876	Pole	La Puente	NEW
125	T-00546879	Pole	La Puente	NEW
129	T-00546874	Pole	La Puente	NEW
131	T-00546862	UNDERGROUND	Pomona	NEW
138	T-00546864	UNDERGROUND	La Verne	NEW
139	T-00546865	UNDERGROUND	La Verne	NEW
140	T-00546869	UNDERGROUND	La Verne	NEW

141	T-00546871	UNDERGROUND	La Verne	NEW
142	T-00546872	UNDERGROUND	La Verne	NEW

Violation	Affected Comp	Inspection Date	HF Tier	Due Date
strained by vegetation	FRONTIER	10/6/2025	GEN	10/10/2028
The Frontier service drop attached to each of t	FRONTIER	10/6/2025	GEN	10/10/2028
strained by vegetation, abandoned service dro	FRONTIER	10/6/2025	GEN	10/10/2028
strained by vegetation	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
POLE TRANSFER	FRONTIER	10/6/2025	GEN	10/10/2026
CLEARANCE ISSUE WITH STREETLIGHT	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/6/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2026
The Frontier service drop attached to each of t	FRONTIER	10/6/2025	GEN	10/10/2028
An unauthorized camera was attached	FRONTIER	10/6/2025	GEN	10/10/2028
– the down guy anchor supporting the pole wa	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drops	FRONTIER	10/6/2025	GEN	12/31/2026
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
Frontier communications service drop support	FRONTIER	10/6/2025	GEN	10/10/2028
Frontier communications service drop support	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
abandoned service drop	FRONTIER	10/6/2025	GEN	10/10/2028
riser not properly secured to pole.	FRONTIER	10/6/2025	GEN	10/10/2030
Frontier communications conductor supported	FRONTIER	10/6/2025	GEN	10/10/2028
The Frontier riser conduit attached to Pole No.	FRONTIER	10/6/2025	GEN	10/10/2028
Frontier communications service drop was in c	FRONTIER	10/6/2025	GEN	10/10/2028
the lashing wire supported on the pole was bro	FRONTIER	10/6/2025	TIER 3	4/10/2026
The climbing space on Pole No. 1224105E was	FRONTIER	10/6/2025	TIER 3	10/10/2026
The Frontier service drop attached to each of t	FRONTIER	10/6/2025	TIER 3	10/10/2026
strained by vegetation, abandoned service dro	FRONTIER	10/6/2025	TIER 3	10/10/2026
strained by vegetation	FRONTIER	10/6/2025	TIER 2	10/10/2028
Frontier conductor in contact with a third-part	FRONTIER	10/6/2025	GEN	10/10/2028
Frontier communications service drop was in c	FRONTIER	10/6/2025	GEN	10/10/2028
POLE STEP located at a height less than eight f	FRONTIER	10/6/2025	GEN	10/10/2028
Frontier communications conductor supported	FRONTIER	10/6/2025	GEN	10/10/2028
Frontier service drop was not properly secured	FRONTIER	10/6/2025	GEN	10/10/2028
Frontier underground structure covers was mis	FRONTIER	10/6/2025		10/10/2028
The casing of Handhole Structure No. 2423204	FRONTIER	10/6/2025		10/10/2028
The cover of the pole box Structure No. PB158	FRONTIER	10/6/2025		10/10/2028
The cover of the pole box Structure No. PB159	FRONTIER	10/6/2025		10/10/2028

Frontier underground structure covers was mis	FRONTIER	10/6/2025		10/10/2028
Frontier underground structure covers was mis	FRONTIER	10/6/2025		10/10/2028