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

SENT VIA ELECTRONIC MAIL

October 6, 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 Susanville and Westwood 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's September 5, 2025, report regarding Frontier's Susanville and Westwood region Communications Infrastructure Provider (CIP) audit conducted from July 21- 25, 2025.

I. Records Review

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 May 2020 through April 2025 found that 329 out of 498 (or 66%) pending work orders are overdue and 34 out of 39 (or 87%) 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 363 late work orders by hazard level.

Table 1: Late Work Orders

Hazard Level	Late Pending Work Orders	Late Closed Work Orders	Total Late Work Orders
1	4	5	9
2b	315	26	341
2c	8	1	9
4	0	2	2
N/A	2	0	2
Total	329	34	363

Frontier must provide ESRB with its corrective action plan to complete the 329 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Response: The four Hazard Level 1 tickets were completed as of September 26, 2025. The remaining 325 tickets will be completed by November 15, 2025.

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	TK3215308	487
2b	TK3175278	600
2c	TK1554917	712
4	TK1814638	523
N/A	TK2824760 and TK2824761	48

Frontier identified work order #TK3215308 on October 15, 2023, to repair a broken pole with a required finish date of October 16, 2023. The work order was completed on February 14, 2025, indicating it was 487 days past the required finish date of October 16, 2023.

Frontier identified work order #TK3175278 on September 10, 2023, for a broken ground wire or rod. According to Frontier maintenance procedures, a 2b priority work order requires to be completed within 12 months. This would require the work order to be completed by September 10, 2024. The work order spreadsheet incorrectly listed a target finish date of September 8, 2023. The work order is still pending.

Frontier identified work order #TK1554917 on May 19, 2020, for an unauthorized attachment with a required finish date of May 19, 2023. The work order is still pending.

Frontier identified work order #TK1814638 on November 20, 2020, for an abandoned service drop with a required finish date of November 24, 2023. Frontier has not yet completed the work.

Response: The six most overdue work orders noted in Table 2 were completed as of September 26, 2025.

The work order spreadsheet also had two work orders (TK2824761 and #TK2824760) with no priority assigned. The two work orders were both identified on September 7, 2022, for a broken down guy with a required finish date of November 4, 2023. The two work orders were completed on December 22, 2023, indicating they were 48 days past the required finish date of November 4, 2023. All work orders must be assigned a priority level when created.

2. **GO 95, Rule 80.1A(1) – Inspection Requirements for Joint-Use Poles in High Fire-Threat District** states in part:
"In Tiers 2 and 3 of the High Fire-Threat District, inspection intervals for (i) Communication Lines located on Joint Use Poles (see Rule 21.8) that contain Supply Circuits (see Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table."

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

ESRB's review of Frontier's patrols and detailed inspections conducted between 2020 and 2025 found that Frontier has a total of 237 late patrol inspections. Pole 6562696

was the most overdue patrol inspection with a total of 868 days in between patrol inspections. A patrol inspection is required every two years for a joint use pole in a Tier 2 HFTD (High Fire Threat District).

Response: Pole inspections are assigned to Frontier's vendor at the beginning of each year for completion within the calendar year. Each of the 237 noted late patrol inspections were completed within two calendar years of the last inspection. Therefore, patrol inspections last completed in 2021 were completed within 2023. Patrol inspections last completed in 2022 were completed within 2024.
Additionally, Frontier identified an error in its inspection records file submitted on July 2, 2025 in response to the Susanville and Westwood Audit data request. Inspection records file "Frontier Confidential CA GO 95 Inspection Results – Susanville Westwood.xls" contained (537) Los Angeles area records which were incorrectly listed as location "Westwood". Frontier is submitting corrected files "Frontier Confidential CA GO 95 Inspection Results – Susanville Westwood Updated.xls" and "Frontier Redacted CA GO 95 Inspection Results – Susanville Westwood Updated.xls" which include the correct "Westwood" wire center pole inspection records.
Patrol inspections for the corrected Tier 2 HFTD Westwood records were completed within two calendar years, see the files "Frontier Confidential CA GO 95 Inspection Results – Susanville Westwood Updated.xls" and "Frontier Redacted CA GO 95 Inspection Results – Susanville Westwood Updated.xls".

3. **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 May 2020 and April 2025. Frontier's underground facilities shall be inspected frequently and thoroughly to ensure compliance with safety and reliability standards.

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

ESRB identified the following violations during the field inspection:

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
11	Facilities need to be transferred to new pole.
28	There was a guy wire in contact with another pole.
40	Fiber terminal is not properly mounted.
45	Facilities need to be transferred to new pole.
45	Fiber terminal is not properly mounted.
51	Pole has woodpecker damage.
51	Pole is leaning.
54	There is an excess drip loop on the ground.

58	Service drop is sagging midspan.
72	Service drop is sagging midspan.
88	Facilities need to be transferred to new pole.
97	Old pole still remains after facilities have been transferred.
98	Facilities need to be transferred to new pole.
105	There is a broken communications crossarm.
114	Pole is leaning.
115	Facilities need to be transferred to new pole.
119	There is vegetation strain on the guy wire.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 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:

Table 5: GO 95, Rule 31.6 Findings

Location #	Findings
2	There was an abandoned service drop.
8	There was an abandoned service drop.
10	There was an abandoned service drop.
19	There was an abandoned service drop.
50	There was an abandoned service drop.
61	There were abandoned lines along the pole.
102	There was an abandoned service drop.

115	There was an abandoned service drop.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 2025.xls".

3. **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 6:

Table 6: GO 95, Rule 35 Findings

Location #	Findings
7	There was vegetation strain on the conductor
43	There was vegetation strain on the conductor.
72	There was vegetation strain on the conductor.
128	There was vegetation strain on the conductor.
136	There was vegetation strain on the conductor.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 2025.xls".

4. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings Etc. states in part**:
"Clearances between overhead conductors, guys, messengers, or trolley span wires and tops or rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and building, poles structures, or other objects, shall not be less than those set forth in Table 1 at a temperature of 60 degrees F. and no wind..."

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

Table 7: GO 95, Rule 37 Findings

	Findings
15	The Frontier conductor was 14 feet 4 inches above the driveway. Table 1 requires communication conductors to be 15 feet above ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment.
17	The Frontier conductor was 13 feet 10 inches above the road. Table 1 requires communication conductors to be 15 feet above ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment.
78	The Frontier conductor was 14 feet 9 inches above the road. Table 1 requires communication conductors to be 15 feet above ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment.
80	The Frontier conductor was 14 feet above the driveway. Table 1 requires communication conductors to be 15 feet above ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment.
92	The Frontier conductor was 13 feet 10 inches above the driveway. Table 1 requires communication conductors to be 15 feet above ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment.
93	The Frontier conductor was 14 feet 7 inches above the road. Table 1 requires communication conductors to be 15 feet above ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 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
2	The Frontier conductor was in contact with the communications guy wire. Table 2 requires a minimum

	clearance of 3 inches between guys and spans wires passing conductors supported on the same poles.
30	The 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.
30	The Frontier terminal was in contact with the communications guy wire. Table 2 requires a minimum clearance of 3 inches between guys and spans wires passing conductors supported on the same poles.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 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
28	Guy wire was missing a guy guard.
57	Guy guard was broken.
68	Guy guard was broken.
88	Guy wire was missing a guy guard.
133	Guy wire was missing a guy guard.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 2025.xls".

7. **GO 95, Rule 84.7, 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 and87.4–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 findings related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 84.7A Findings

Location #	Findings
5	Vegetation impedes climbing space.
12	Vegetation impedes climbing space.
16	Vegetation impedes climbing space.
31	Vegetation impedes climbing space.
32	Vegetation impedes climbing space.
81	Vegetation impedes climbing space.
90	Vegetation impedes climbing space.
109	Vegetation impedes climbing space.
119	Vegetation impedes climbing space.
121	Vegetation impedes climbing space.
129	Vegetation impedes climbing space.
130	Vegetation impedes climbing space.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 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 11:

Table 11: GO 95, Rule 84.6B Findings

Location #	Findings
24	There was an exposed ground wire and exposed ground rod.
45	There was an exposed ground wire.
101	There was an exposed ground wire.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 2025.xls".

9. 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 findings related to the above rule are listed in Table 12:

Table 12: GO 95, Rule 86.2 Findings

Location #	Findings
68	There was a loose guy wire.
98	Guy wire was broken.
101	There was a loose guy wire.
103	There was a loose guy wire.
111	There was a loose guy wire.
132	There was a loose guy wire.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 2025.xls".

10. 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 ground by:*

a) 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 13**:**

Table 13: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
20	Riser cover was broken.
41	There was no riser cover for conductor on pole.
49	Riser cover was broken.
65	There was no riser cover for conductor on pole.
114	The riser cover was below 8 feet.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 2025.xls".

11. **GO 95, Rule 91.3-C Stepping states:** *"Where installed, the lowest step shall not be 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."*

ESRB's finding related to the above rule is listed in Table 14:

Table 14: GO 95, Rule 91.3-C Finding

Location #	Findings
10	Pole had a low step.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 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 findings related to the above rule are listed in Table 15:

Table 15: GO 128, Rule 17.1 Findings

Location #	Findings
25	Pedestal was lying on ground.
37	Pedestal doors were found open with exposed wires

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 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
25	No mark of ownership on pedestal.
27	No mark of ownership on pedestal.
33	No mark of ownership on pedestal.
37	No mark of ownership on pedestal.
38	No mark of ownership on B-box.
39	No mark of ownership on pedestal.
113	No mark of ownership on pedestal.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 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
1	Cable TV ground wire was exposed.
7	Electrical ground wire was exposed.
7	Cable TV conductor was in contact with Frontier conductor.
8	Electrical ground wire was broken.
9	There was vegetation strain on cable TV conductor.
12	Electrical ground wire was exposed.
14	Pole is leaning.
18	Electrical ground wire was exposed
26	Electrical ground wire was exposed.
40	Cable TV ground wire was exposed.
40	Pole has a low pole step.
41	Cable TV conductor was missing a riser cover.
42	There was vegetation strain on cable TV conductor.
43	There was vegetation strain on cable TV conductor.
46	Electrical ground wire was exposed.
48	Cable TV service drop was low.
49	Electrical ground wire was exposed.
49	Cable TV has an abandoned service drop.
50	Cable TV has an abandoned service drop.

53	Electrical ground wire was exposed.
55	Excess Cable TV conductor was on the ground.
55	Electrical ground wire was exposed.
59	Cable TV ground wire was exposed.
60	Cable TV pedestal was found open.
62	Electrical ground wire was exposed.
65	Electrical ground wire was exposed.
66	Pole has a low pole step.
68	Electrical ground wire was exposed.
71	Pole has a low pole step.
72	Electrical ground wire was exposed.
72	Electrical conductor was in contact with guy wire.
73	Electrical ground wire was exposed.
74	Electrical ground wire was exposed.
78	Cable TV conductor was low.
79	Cable TV conductor was missing a riser cover.
81	Electrical ground wire was exposed.
82	There was vegetation strain on cable TV conductor.
82	Pole has a low pole step.
83	Electrical ground wire was exposed.
86	Cable TV conductor was missing a riser cover.
87	Cable TV conductor was not properly buried.
89	Cable TV ground wire and ground rod were exposed.
90	Cable TV conductor was missing a riser cover.
92	Cable TV conductor was low.
93	Cable TV ground wire was exposed.
93	Cable TV conductor was low.
99	Cable TV conductor was missing a riser cover.
104	Electrical ground rod was exposed.
107	Cable TV has an abandoned service drop.
115	Cable TV ground wire was exposed.
116	Cable TV has an abandoned service drop.
118	Electrical ground rod was exposed.
127	Cable TV service drop was low.

128	There was vegetation strain on cable TV conductor.
134	Electrical ground wire was exposed.
137	Pole has a low pole step.

Response: Tickets were issued for the listed infractions. See the file "Frontier Tickets Susanville Westwood CPUC audit 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
Rafael Herranz, Utilities Engineer, ESRB, SED, CPUC
Jenny Smith, Director Government and Regulatory Affairs, Frontier