

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 19, 2025

CA2025-1198

Judy Geise  
Manager, Regulatory  
Frontier Communications  
1919 McKinney Avenue  
Dallas, TX 75201

Subject: Audit of Frontier Communications' Riverside County East Service Area

Ms. Geise:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller and Sultan Tipu of my staff conducted a communications infrastructure provider audit of Frontier Communications' Riverside County East Service Area from January 13, 2025 to January 17, 2025. The audit included a review of Frontier's records and field inspections of Frontier's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than April 21, 2025, by electronic or hard copy, of all corrective measures taken by Frontier to remedy and prevent such violations. Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact James Miller at (213) 660- 8898 or [James.Miller@cpuc.ca.gov](mailto:James.Miller@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC  
James Miller, Utilities Engineer, ESRB, SED, CPUC

## **AUDIT FINDINGS**

### **I. Records Review**

My staff reviewed the following records during the audit:

- Inspection records.
- Work order/corrective ticket records
- Third Party Notifications
- Pole Loading Calculation Records
- Inspection and maintenance procedures

## II. Field Inspections

My staff inspected the following structures during the field inspection portion of the audit:

| No. | Facility Identification | Facility Type | Location   |
|-----|-------------------------|---------------|------------|
| 1   | 4794493E                | Pole          | Blythe     |
| 2   | 4794486E                | Pole          | Blythe     |
| 3   | 4940062E                | Pole          | Blythe     |
| 4   | 4199757E                | Pole          | Blythe     |
| 5   | 1992534E                | Pole          | Blythe     |
| 6   | 1661084E                | Pole          | Blythe     |
| 7   | 4260266E                | Pole          | Blythe     |
| 8   | 1969682                 | Pole          | Palo Verde |
| 9   | 59599S                  | Pole          | Palo Verde |
| 10  | 239462                  | Pole          | Palo Verde |
| 11  | 239480S                 | Pole          | Palo Verde |
| 12  | 239495                  | Pole          | Palo Verde |
| 13  | 4758412E                | Pole          | Palo Verde |
| 14  | 4061291E                | Pole          | Palo Verde |
| 15  | 1162-CRT                | Pole          | Palo Verde |
| 16  | 4758411E                | Pole          | Palo Verde |
| 17  | 4758410E                | Pole          | Palo Verde |
| 18  | 4061290E                | Pole          | Palo Verde |
| 19  | 4757279E                | Pole          | Palo Verde |
| 20  | VZ254673                | Pole          | Palo Verde |
| 21  | 4199809E                | Pole          | Palo Verde |
| 22  | CTC1110289              | Pole          | Palo Verde |
| 23  | CTC1110288              | Pole          | Palo Verde |
| 24  | CTC1110287              | Pole          | Palo Verde |
| 25  | VZ101791                | Pole          | Palo Verde |
| 26  | VZ102228                | Pole          | Palo Verde |
| 27  | CT213834                | Pole          | Palo Verde |
| 28  | 439906S                 | Pole          | Palo Verde |
| 29  | VZ101792                | Pole          | Palo Verde |
| 30  | 2190925E                | Pole          | Palo Verde |
| 31  | 4758409E                | Pole          | Palo Verde |
| 32  | VZ101793                | Pole          | Palo Verde |
| 33  | CTC1110281              | Pole          | Palo Verde |
| 34  | CTC1110282              | Pole          | Palo Verde |
| 35  | 3838                    | Pedestal      | Blythe     |
| 36  | FT35626                 | Handhole      | Blythe     |
| 37  | 3846                    | Pedestal      | Blythe     |
| 38  | FT35630                 | Handhole      | Blythe     |

|    |                         |           |        |
|----|-------------------------|-----------|--------|
| 39 | 3844                    | Pedestal  | Blythe |
| 40 | 3843                    | Pedestal  | Blythe |
| 41 | 3813                    | Pedestal  | Blythe |
| 42 | 3814                    | Pedestal  | Blythe |
| 43 | T-35634                 | Handhole  | Blythe |
| 44 | 3818                    | Pedestal  | Blythe |
| 45 | 3819                    | Pedestal  | Blythe |
| 46 | XTBM                    | Cross Box | Blythe |
| 47 | 4793906E                | Pole      | Blythe |
| 48 | 1840825E                | Pole      | Blythe |
| 49 | 4320307E                | Pole      | Blythe |
| 50 | 4973480E                | Pole      | Blythe |
| 51 | 4666669E                | Pole      | Blythe |
| 52 | 4704806E                | Pole      | Blythe |
| 53 | 59658                   | Pole      | Blythe |
| 54 | 38007S                  | Pole      | Blythe |
| 55 | 2073454E                | Pole      | Blythe |
| 56 | 38008S                  | Pole      | Blythe |
| 57 | 1585833E                | Pole      | Blythe |
| 58 | 2073720E                | Pole      | Blythe |
| 59 | 4639883E                | Pole      | Blythe |
| 60 | 4507571E                | Pole      | Blythe |
| 61 | 59603S                  | Pole      | Blythe |
| 62 | 4199795E                | Pole      | Blythe |
| 63 | 2350576E                | Pole      | Blythe |
| 64 | 4320314E                | Pole      | Blythe |
| 65 | 2671 Colorado River Rd. | Pedestal  | Blythe |
| 66 | 2655 Colorado River Rd. | Pedestal  | Blythe |
| 67 | 2654 Colorado River Rd. | Pedestal  | Blythe |
| 68 | 2644 Colorado River Rd. | Pedestal  | Blythe |
| 69 | 2614 Colorado River Rd. | Pedestal  | Blythe |
| 70 | 2667 Sandy Point Dr.    | Pedestal  | Blythe |
| 71 | 2733 Sandy Point Dr.    | Pedestal  | Blythe |
| 72 | 3821 Sandy Point Dr.    | Pedestal  | Blythe |
| 73 | 3839 Sandy Point Dr.    | Pedestal  | Blythe |
| 74 | 3845 Sandy Point Dr.    | Pedestal  | Blythe |
| 75 | 3841 Sandy Point Dr.    | Pedestal  | Blythe |
| 76 | 3875 Sandy Point Dr.    | Pedestal  | Blythe |
| 77 | 3889 Sandy Point Dr.    | Pedestal  | Blythe |
| 78 | 4601034E                | Pole      | Blythe |
| 79 | 4260100E                | Pole      | Blythe |
| 80 | 4800571E                | Pole      | Blythe |
| 81 | 4846068E                | Pole      | Blythe |

|     |                          |      |             |
|-----|--------------------------|------|-------------|
| 82  | 1720792E                 | Pole | Blythe      |
| 83  | 38093S                   | Pole | Blythe      |
| 84  | 1585827E                 | Pole | Blythe      |
| 85  | 1992484E                 | Pole | Blythe      |
| 86  | 1211126D                 | Pole | Mecca       |
| 87  | 922943                   | Pole | Mecca       |
| 88  | 908060D                  | Pole | Mecca       |
| 89  | 929041D                  | Pole | Mecca       |
| 90  | 911721D                  | Pole | Mecca       |
| 91  | 48403CWT                 | Pole | Mecca       |
| 92  | 929051D                  | Pole | Mecca       |
| 93  | 906561D                  | Pole | Mecca       |
| 94  | 910041D                  | Pole | Mecca       |
| 95  | 910042D                  | Pole | Mecca       |
| 96  | 1218902                  | Pole | Mecca       |
| 97  | 90626D                   | Pole | Mecca       |
| 98  | 911767D                  | Pole | Mecca       |
| 99  | 913944                   | Pole | Mecca       |
| 100 | 1188734                  | Pole | Mecca       |
| 101 | 920122D                  | Pole | Mecca       |
| 102 | 906763D                  | Pole | North Shore |
| 103 | 909764D                  | Pole | North Shore |
| 104 | 906765D                  | Pole | North Shore |
| 105 | 906766D                  | Pole | North Shore |
| 106 | 906962D                  | Pole | North Shore |
| 107 | 906963D                  | Pole | North Shore |
| 108 | 906964D                  | Pole | North Shore |
| 109 | 907335D                  | Pole | North Shore |
| 110 | 907737D                  | Pole | North Shore |
| 111 | 907338D                  | Pole | North Shore |
| 112 | 907339D                  | Pole | North Shore |
| 113 | 907340D                  | Pole | North Shore |
| 114 | 907341D                  | Pole | North Shore |
| 115 | 907342D                  | Pole | North Shore |
| 116 | 905153D                  | Pole | Salton      |
| 117 | Tagless pole E/O 905153D | Pole | Salton      |
| 118 | 905155D                  | Pole | Salton      |
| 119 | 905152D                  | Pole | Salton      |
| 120 | 911725D                  | Pole | Mecca       |
| 121 | Tagless pole N/O 911725D | Pole | Mecca       |
| 122 | 920858                   | Pole | Mecca       |
| 123 | 322069D                  | Pole | Mecca       |
| 124 | 1218904                  | Pole | Mecca       |

|     |                               |          |       |
|-----|-------------------------------|----------|-------|
| 125 | Tagless pole W/O 1218904      | Pole     | Mecca |
| 126 | 901195D                       | Pole     | Mecca |
| 127 | 922292                        | Pole     | Mecca |
| 128 | 40150CWT                      | Pole     | Mecca |
| 129 | 907401D                       | Pole     | Mecca |
| 130 | 922054D                       | Pole     | Mecca |
| 131 | S/O 7th St. & Lincoln St.     | Pedestal | Mecca |
| 132 | N/O 7th St. & Lincoln St.     | Pedestal | Mecca |
| 133 | S/O 65th St. & Lincoln St.    | Pedestal | Mecca |
| 134 | N/O 65th St. & Lincoln St.    | Pedestal | Mecca |
| 135 | N/O Previous on Lincoln St.   | Pedestal | Mecca |
| 136 | N/O Previous on Lincoln St.   | Pedestal | Mecca |
| 137 | 64100 Lincoln St.             | Pedestal | Mecca |
| 138 | Across from 64100 Lincoln St. | Pedestal | Mecca |
| 139 | 64245 Lincoln St.             | Pedestal | Mecca |
| 140 | 95376D                        | Pole     | Mecca |
| 141 | W/O Lincoln St. & 64th Ave.   | Pedestal | Mecca |
| 142 | SE/O Lincoln St. & 64th Ave.  | Pedestal | Mecca |
| 143 | NW/O Theodore Wy. & 64th Ave. | Pedestal | Mecca |
| 144 | NE/O Theodore Wy. & 64th Ave. | Pedestal | Mecca |
| 145 | E/O Theodore Wy. & 64th Ave   | Handhole | Mecca |
| 146 | Arthur St. & 70th Ave         | Pedestal | Mecca |

### III. Field Inspection – Violations List

My staff observed the following violations during the field inspection portion of the audit:

**GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, Use**, states in part:

*Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44 .*

The down guy wire on each of the following poles was not taut:

- 4061290E
- 40150CWT

**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 Pole No. 2073720E was located at a height of less than eight feet above an easily climbable foreign structure.

**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.*

Unauthorized foreign attachments were attached on each of the following poles:

- Pole No. 4061291E supported an unauthorized lizard sculpture.
- Pole No. 4199809E supported an unauthorized Neighborhood Watch sign.
- Pole No. 907401D supported an unauthorized sign which read “Se leen las cartas.”

**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 visibility strips attached to each of the following poles were damaged:

- 239462
- VZ254673
- CT213834
- 906561D
- 1218902
- 1188734
- 907335D
- 907341D
- 905153D

A guy guard attached to a down guy wire on Pole No. 906561D was damaged.

**GO 95, Rule 56.4, Clearances**, states in part:

*The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall not be less than as specified in Table 2, Case 19.*

Table 2, Column C, Case 19 requires guy wires and communications conductors supported on the same pole to maintain a radial clearance of three inches.

A frontier communications conductor was in contact with a third-party down guy wire south of Pole No. 906766D.

**GO 95, Rule 31.6, Abandoned Lines**, states:

*Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.*

A Service drop attached to each of the following poles was permanently abandoned:

- 4973480E
- 905155D

**GO 95, Rule 92.4-D1 – Exposed Cables and Messengers** states in part:

*The exposed communications conductors and messengers shall be grounded: At all deadend poles and at intervals not greater than every one-quarter of a mile (1320 feet).*

The Frontier messenger wire attached to a deadend Pole No. 922054D was not grounded.



**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 conductors were in contact with other communications conductors on or near each of the following poles:

- 4794493E
- 4794486E
- 1641084E
- 4260266E
- 4061290E
- 1992484E
- 1211126D
- 90626D
- 911725D
- 1162CRT
- 4758411E

**GO 95, Rule 84.4, Clearances, Section (A)(3),** states:

*Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet*

A Frontier service drop attached to Pole No. CT213834 was in contact with the ground in an area accessible to pedestrians only.

**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 locking mechanism on each of the following underground structures was broken:

- Pedestal 3843
- Pedestal 3818
- The pedestal near 3845 Sandy Point Drive in Blythe.
- The pedestal south of 64100 Lincoln Street in Mecca.
- The Handhole east of the intersection of Theodore Way and 64<sup>th</sup> Street in Mecca.

A pedestal on the southeast corner of Lincoln Street and 64<sup>th</sup> Street in Mecca was missing its cover.

The housing of the pedestal at 64245 Lincoln Street was damaged.

The pedestal north of the intersection of Lincoln Street and 7<sup>th</sup> Street could not be closed due to dirt and debris built up around its base.

**GO 128 Rule 34.3, Self-contained Surface-mounted Equipment,** states in part:

*Equipment installed partially or completely above the ground surface and not enclosed by a vault, room or fence shall conform to the following:*

*C. Locking Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.*

The following above-ground enclosures were not secured against entry by unauthorized persons by means of locks or other suitable means:

- Pedestal 3843
- Pedestal 3818
- Pedestal 3819
- The pedestal at 2654 Colorado River Road in Blythe.
- The pedestal at 2733 Sandy Point Drive in Blythe.
- The pedestal at 3839 Sandy Point Drive.
- The pedestal at 3861 Sandy Point Drive.
- The pedestal at 3889 Sandy Point Drive.
- The pedestal north of the intersection of Lincoln Street and 7<sup>th</sup> Street in Mecca.
- The pedestal south of 64100 Lincoln Street.
- The pedestal at 64245 Lincoln Street.

**GO 128, Rule 42.7, Covers,** states in part:

*Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal.*

The lid to Handhole FT35626 was unsecured.