STATE OF CALIFORNIA Gavin Newsom, Governor

#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

September 3, 2025

CA2025-1328

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

SUBJECT: Audit of Frontier Communications' San Bernardino East Metropolitan District

Ms. Geise:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Stacey Ocampo and SM Arafat Kamal of my staff conducted a Communication Infrastructure Provider (CIP) audit of Frontier's San Bernardino East Metropolitan District on July 7-11, 2025. The audit included a review of Frontier's inspection and maintenance records and a field inspection of Frontier's communication 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 October 3, 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 Stacey Ocampo (213) 266-4712 or <a href="mailto:stacey.ocampo@cpuc.ca.gov">stacey.ocampo@cpuc.ca.gov</a>.

Sincerely,

Fadi Daye, P.E.

Program and Project Supervisor Electric Safety and Reliability Branch Safety and Enforcement Division California Public Utilities Commission

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**Enclosures: CPUC Audit Findings** 

Cc: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
 Eric Wu, Program Manager, Electric Safety and Reliability Branch, 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

#### **AUDIT FINDINGS**

#### I. Records Review

During the audit, my staff reviewed the following records:

- Overhead detailed and patrol inspections 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

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

No.	Structure ID	Structure Type	Location
1	1884601E	Pole	Crestline
2	1818939E	Pole	Crestline
3	4421525E	Pole	Crestline
4	GT140867	Pole	Crestline
5	1056803E	Pole	Crestline
6	1056802E	Pole	Crestline
7	2250603E	Pole	Crestline
8	1009063E	Pole	Crestline
9	1009064E	Pole	Crestline
10	1261351E	Pole	Crestline
11	1261352E	Pole	Crestline
12	1261353E	Pole	Crestline
13	405486E	Pole	Lake Arrowhead
14	405487E	Pole	Lake Arrowhead
15	405488E	Pole	Lake Arrowhead
16	405489E	Pole	Lake Arrowhead
17	1589784E	Pole	Lake Arrowhead
18	405490E	Pole	Lake Arrowhead
19	1818829E	Pole	Lake Arrowhead
20	4323899E	Pole	Lake Arrowhead
21	4323900E	Pole	Lake Arrowhead
22	GT107966	Pole	Lake Arrowhead
23	549381E	Pole	Lake Arrowhead
24	1854879E	Pole	Lake Arrowhead
25	4027172E	Pole	Lake Arrowhead
26	4450226E	Pole	Muscoy
27	F15033Y	Pole	Muscoy
28	2121459E	Pole	Muscoy
29	18556 Arrowhead Blvd.	Pole	Muscoy
30	1714955E	Pole	Muscoy
31	1714999E	Pole	Muscoy
32	4631047E	Pole	Muscoy
33	1714997E	Pole	Muscoy
34	1714996E	Pole	Muscoy
35	1714995E	Pole	Muscoy
36	CIT37130	Pole	Big Bear Lake
37	CIT37131	Pole	Big Bear Lake
38	CIT37129	Pole	Big Bear Lake
39	CIT37128	Pole	Big Bear Lake
40	7407BV	Pole	Big Bear Lake
41	CIT37392	Pole	Big Bear Lake
42	CIT37138	Pole	Big Bear Lake

42	1252CDV	D 1	D. D. I.1
43	12526BV	Pole	Big Bear Lake
44	CTC2211075	Pole	Big Bear Lake
45	12690BV	Pole	Big Bear Lake
46	12689BV	Pole	Big Bear Lake
47	13840BV	Pole	Big Bear Lake
48	BV12211	Pole	Big Bear Lake
49	3717BV	Pole	Big Bear Lake
50	13845BV	Pole	Big Bear Lake
51	4869057E	Pole	Running Springs
52	1056841E	Pole	Running Springs
53	1056842E	Pole	Running Springs
54	21266CIT	Pole	Running Springs
55	4879008E	Pole	Running Springs
56	988538E	Pole	Running Springs
57	4558826E	Pole	Running Springs
58	739386E	Pole	Running Springs
59	739385E	Pole	Running Springs
60	1384264E	Pole	Running Springs
61	739384E	Pole	Running Springs
62	4879009E	Pole	Running Springs
63	739383E	Pole	Running Springs
64	709873E	Pole	Running Springs
65	4983848E	Pole	Running Springs
66	4603523E	Pole	San Bernardino
67	103 E Ninth St.	Pole	San Bernardino
68	5036583E	Pole	San Bernardino
69	4691105E	Pole	San Bernardino
70	GT206145	Pole	San Bernardino
71	4438199E	Pole	San Bernardino
72	4542911E	Pole	San Bernardino
73	2101654E	Pole	San Bernardino
74	1480796E	Pole	San Bernardino
75	215 E Ninth St.	Pole	San Bernardino
76	2042510E	Pole	San Bernardino
77	4986863E	Pole	San Bernardino
78	2013561E	Pole	Redlands
79	782443E	Pole	Redlands
80	2013560E	Pole	Redlands
81	2013559E	Pole	Redlands
82	4407979E	Pole	Redlands
83	2013558E	Pole	Redlands
84	4703638E	Pole	Redlands
85	2013556E	Pole	Redlands
86	33 W Lugonia Ave	Pole	Redlands
87	1004 Columbia St.	Pole	Redlands
88	930 Columbia St.	Pole	Redlands
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89	918 Columbia St.	Pole	Redlands
90	420 W Sun Ave.	Pole	Redlands
91	1588994E	Pole	Yucaipa
92	1044648E	Pole	Yucaipa
93	1806054E	Pole	Yucaipa
94	1215194E	Pole	Yucaipa
95	1215193E	Pole	Yucaipa
96	1215192E	Pole	Yucaipa
97	1215191E	Pole	Yucaipa
98	33792 Washington Dr.	Pole	Yucaipa
99	1215190E	Pole	Yucaipa
100	33816 Washington Dr.	Pole	Yucaipa
101	H2048	Fiber Distribution Hub	Banning
102	FT2055202	Handhole	Banning
103	FT2055203	Handhole	Banning
104	FT2055204	Handhole	Banning
105	H2051	Fiber Distribution Hub	Banning
106	H2052	Fiber Distribution Hub	Banning
107	FC741	Vault	Banning
108	1054 Gilman St.	Vault	Banning
109	T8158A	Pedestal	Beaumont
110	T8159A	Pedestal	Beaumont
111	T8160	Pedestal	Beaumont
112	T8164A	Pedestal	Beaumont
113	T8170A	Pedestal	Beaumont
114	T8166A	Pedestal	Beaumont
115	T8167	Pedestal	Beaumont
116	T8168A	Pedestal	Beaumont
117	T8169A	Pedestal	Beaumont

#### **III.** Field Inspection – Violations List

My staff 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 420 W Sun Ave was damaged.
- A Frontier pole located at 18556 Arrowhead Blvd had a rope tied around the pole.
- The Frontier service drop was not properly secured to pole 7407BV.

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

- 103 E Ninth St
- 930 Columbia St.

Incomplete pole transfer on each of the following poles:

<ul> <li>1714</li> </ul>	1999E
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4631047E

- \_
  - 3713BV
- 1714995E
- 12690BV
- 1056841E
- 4879008E
- 4879009E
- 1588994E

## 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:

- 18556 Arrowhead Blvd
- 918 Columbia St

#### 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
- 405486E
- 405487E
- 405488E
- 1818829E
- 4323899E

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

# 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.

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.

#### 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
- GT140867
- 1056803E
- 4323899E

- 4323900E
- CIT37129
- 103 E Ninth St.
- 2042510E

#### 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
- 1261353E
- 405486E
- F15033Y
- 1056842E

- 709873E
- 4691105E
- 215 E Ninth St.
- 2042510E
- 4323900E

- 1004 Columbia St.
- 420 W Sun Ave
- 1215193E
- 33792 Washington Dr.

### 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
- 103 E Ninth St
- 2042510E

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.

#### 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.

#### 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 1054 Gilman St was corroded.
- The cover of the pedestal T8167A was damaged.
- The cover of the pedestal T8169A was damaged.

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

- FT2055202
- FT2055203
- FT2055204
- H2051
- H2052