

SENT VIA ELECTRONIC MAIL

July 24, 2026

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

Re: Response to Frontier Sacramento Region Audit Report.

Dear Rickey Tse,

Frontier California Inc (U-1002-C) ("Frontier") hereby responds to the June 25, 2026, California Public Utilities Commission (Commission) audit report regarding the Frontier Sacramento Region Communications Infrastructure Provider Audit conducted April 6 - 10, 2026.

I. Records Review

- Service area statistics
- Maintenance policies, procedures, programs, and job aids for wired, wireless, overhead, and underground
- Inspector's qualification and training programs
- Patrol and Detailed inspection lists
- Open, Completed and Canceled work orders
- Safety Hazard notifications issued to Third Parties
- Safety Hazard notifications received from Third Parties.
- Pole loading calculations
- Intrusive inspections
- New construction projects from January 2024 through January 2026

II. Records Violations

During the records review portion of the audit, ESRB Staff identified the following violation.

- 1. General Order (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. Exception: Potential violations specified in Appendix J or subsequently approved through Commission processes, including, but not limited to, a Tier 2 Advice Letter under GO 96B, that can be completed at a future time as opportunity-based maintenance.*

GO 95, Appendix J, Exceptions from the Maximum Time Period for Corrective Actions for Level 3 Conditions in Rule 18, states in part:

<i>Line Element</i>	<i>Communications</i>
<i>Poles</i>	<i>Climbing space obstructions from vegetation with incidental intrusion into the communication space that (i) does not prevent work from being done does and (ii) does not violate Rule 35.</i> <i>Rationale: As long as the vegetation can be addressed by the worker and does not prevent work from being done or pose a risk to the worker, then it is reasonable to address the correction as opportunity maintenance.</i>

ESRB’s review of Frontier’s work orders for the period from January 2021 through January 2026 found that 71 out of 683 work orders (or 10.4%) were overdue. ESRB categorized Frontier’s “New” work orders that remained incomplete after the required completion date as late-pending work orders and “Resolved” work orders with completion dates after the assigned due date as late-closed work orders. Table 1 summarizes the late-pending and late-closed work orders by assigned priority level and Appendix 1 lists the actual late work orders.

Frontier must provide ESRB with a corrective action plan that addresses completion of the two late-pending work orders, and implementation of preventive measures to ensure that Frontier completes future work orders within the required timeframes.

Response: After further review, Frontier’s records indicate the two Late-Pending Work Orders are completed: TK3747135 was completed on May 1, 2025. TK3239634 relates to a PG&E pole and required action from PG&E. The ticket was closed 7/23/2025.

Table 1: Late Work Orders Summary

Hazard Level	Late-Pending Work Orders ¹	Late-Closed Work Orders	Total Late Work Orders
1	1	1	2
2a	0	1	1
2b	1	67	68
2c	0	0	0
3	0	0	0
4	0	0	0
Total	2	69	71

In addition, 12 of the 683 work orders were assigned priority designations of “Low” or “Normal.” These priority designations are not a recognized hazard-level in GO 95, Rule 18. Additionally, these priorities are not defined or described in Frontier’s maintenance program. Despite the unrecognized priority designations, Frontier completed all 12 work orders within the assigned due date.

Further review of the Frontier’s maintenance program found that Frontier established an internal Level 4 priority category. The program describes Level 4 as *“issues that pose minimal safety risks beyond Level 3”* and states that Level 4 *“designates opportunity maintenance during construction activity at the same pole.”* This description aligns with the Exception noted in GO 95, Rule 18.B1(a)(iii).

One Level 4 work order (TK3232048) stated that vegetation was trimmed to gain access to the pole. The exception for vegetation climbing space obstructions in GO 95, Appendix J, applies only when the intrusion is incidental and does not prevent work from being done on the pole. Because Frontier needed to remove vegetation to gain access to the pole, this indicates the obstruction prevented access or work from being performed. Therefore, this work order was improperly classified under Frontier’s Level 4 category and should have been prioritized under the applicable GO 95, Rule 18-B level.

Response: The twelve work orders assigned “Low” or “Normal” priority designations relate to the removal of buddy poles that no longer support existing facilities. According to Frontier’s procedures, these work orders should have been assigned priority level 3. Frontier’s processes have been modified to assign priority level 3 to work orders related to the removal of infrastructure. Additionally, Frontier acknowledges that TK3232048 was improperly classified under our internal priority Level 4. This finding has been reviewed with the business owners responsible for priority assignments to ensure that future classifications adhere to the requirements set forth in GO 95, Rule 18-B.

III. Field Inspection

IV. Field Inspection – Violations List

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

¹ Work orders that Frontier categorizes as “New” are considered pending.

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.

ESRB Staff's findings related to the above rule are listed in Table 3:

Table 3: GO 95, Rule 31.1. Findings

Locations	Findings
3, 4, 5, 44, 64	Pole exhibiting excessive lean
11	Broken cross arm
24, 38, 59, 60, 67, 107	Incomplete pole transfer (buddy pole)
48	Pole exhibiting excessive lean and damage near pole base
72, 100	Equipment box not security mounted
84, 118, 122, 123	Broken lashing wire
92	Abandoned down guy appears to have been cut and terminal box is not securely attached to the pole
116	Work order indicates the pole was removed; pole remains in place. Ticket ID: TK2173986 states that the pole was removed and that the work was completed on 10/10/23

Response: Repair tickets were issued. See the file "CPUC Sacramento Audit Tickets Issued.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 Staff's findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 31.6 Findings

Locations	Findings
3, 87, 90, 119	Abandoned service drop
54, 101	Abandoned terminal case
71	Exposed ground wire appears disconnected/abandoned

Response: Repair tickets were issued. See the file "CPUC Sacramento Audit Tickets Issued.xls".

3. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires states:

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, Cases 8–15, inclusive.

The clearances in Table 2 shall in no case be reduced more than 10 percent, except mid-span in Tier 3 of the High Fire-Threat District where they shall be reduced by no more than 5 percent, because of temperature and loading as specified in Rule 43 or because of a difference in size or design of the supporting pins, hardware or insulators. All clearances of less than 5 inches shall be applied between surfaces, and clearances of 5 inches or more shall be applied to the center lines of such items. The utilities of interest (including electric supply and/or communication companies) shall cooperate and provide relevant information for sag calculations for their facilities, upon request.

ESRB Staff's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 38 Findings

Locations	Findings
10	Communications line in contact with down guy
43, 70	Communications line in contact with PG&E's service drop

Response: Repair tickets were issued. See the file "CPUC Sacramento Audit Tickets Issued.xls".

4. GO 95, Rule 81.6, Stepping, states: *(See Rule 91.3-B)*

GO 95, Rule 91.3, Stepping, Section B., Location of Steps, states in part:

A. Unless otherwise specified in this Order, pole steps used to ascend and descend joint use wood poles are not required. However, occupants on joint use wood poles are not permitted from installing and maintaining temporary or permanent steps.

B. Unless non climbable, joint use nonwood poles shall include provisions for ascending and descending.

C. 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.

ESRB Staff's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rules 81.6 and 91.3-B Finding

Locations	Findings
40	Low pole steps

Response: Repair ticket T-00610345 was issued. See the file "CPUC Sacramento Audit Tickets Issued.xls".

5. GO 95, Rule 84.6 B, 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 staff Staff's findings related to the above rule are listed in Table 7:

Table 7: GO 95, Rule 84.6.B Findings

Locations	Findings
3, 39, 64, 72, 84, 104	Exposed ground wire
50	Ground wire insulation damaged at pole base, exposing conductor

Response: Repair tickets were issued. See the file "CPUC Sacramento Audit Tickets Issued.xls".

6. GO 95, Rule 84.7 A, Climbing Space states:

...the climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–A5.

ESRB Staff's findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 84.7.A Findings

Locations	Findings
38, 45	Climbing space obstructed

Response: Repair tickets were issued. See the file "CPUC Sacramento Audit Tickets Issued.xls".

7. GO 95, Rule 84.8.C (3)(b) Service Drops Residential Premises states in part:

Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet."

ESRB Staff's finding related to the above rule is listed in Table 9:

Table 9: GO 95, Rule 84.8.C(3)(b) Finding

Locations	Findings
26	Low service drop

Response: Repair ticket T-00610338 was issued. See the file "CPUC Sacramento Audit Tickets Issued.xls".

8. GO 95, Rule 86.2, Guys, Use states in part:

Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire stress, the pole below the point of guy attachment acting merely as a strut.

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 Staff's findings related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 86.2 Findings

Locations	Findings
41, 111, 112, 115	Slack down guy

Response: Repair tickets were issued. See the file "CPUC Sacramento Audit Tickets Issued.xls".

9. GO 95, Rule 86.7.B, Anchor Guy states in part:

An insulator shall be installed in each anchor guy which is required to be sectionalized by Rule 86.6–B2, so that such insulator is located not less than 8 feet above the ground and either 8 feet below the level of the lowest supply conductor or not less than 6 feet from surface of pole and not less than one foot below the level of the lowest supply conductor. These sectionalizing requirements for anchor guys can normally be met by insulation at one location; however, short guys or other conditions may require insulation at two locations, one location being not less than 8 feet above the ground and the other location either not less than 8 feet below the lowest supply conductors, or not less than 6 feet horizontally from pole and not less than one foot below the level of the lowest supply conductor. In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule 86.7–B."

ESRB Staff's finding related to the above rule is listed in Table 11:

Table 11: GO 95, Rule 86.7.B Finding

Locations	Findings
96	Vegetation surrounding down guy and contacting it above the guy insulator

Response: Repair ticket T-00633002 was issued. See the file "CPUC Sacramento Audit Tickets Issued.xls".

10. 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 Staff's findings related to the above rule are listed in Table 12:

Table 12: GO 95, Rule 86.9 Findings

Locations	Findings
9	Missing guy guard on outermost down guy
41, 84	Missing guy guard
55	Damaged down guy guard
115	Down guy marker detached

Response: Repair tickets were issued. See the file "CPUC Sacramento Audit Tickets Issued.xls".

11. GO 95, Rule 87.7 D (1), Riser 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 Staff’s findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rules 87.7.D(1) Findings

Locations	Findings
14, 17, 37	Exposed riser
42, 67, 85	Exposed riser at pole base
72	Exposed riser/broken riser guard
78	Exposed riser entering equipment box

Response: Repair tickets were issued. See the file “CPUC Sacramento Audit Tickets Issued.xls”.

12. GO 95, Rule 93, Climbing Space states:

Climbing space shall be provided on all jointly used poles in accordance with the provisions of Rules 54.7, 54.9, 54.10, 54.11, 54.12, and 84.7.

Climbing space on jointly used poles shall be maintained so that its position in relation to the pole is not changed by more than 90 degrees in a vertical distance of less than 8 feet.

Climbing space shall be maintained from the ground level.”

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

Table 14: GO 95, Rule 93 Finding

Locations	Findings
52	Climbing space obstructed

Response: Repair ticket T-00610356 was issued. See the file “CPUC Sacramento Audit Tickets Issued.xls”.

V. Observations

1. GO 95, Rule 18-A, Resolution of Potential Violations of GO 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.”

Table 15 lists all third-party observations during the field inspection.

Table 15: Third-Party Observations

Locations	Observations	Third-Party Utility
2	Abandoned service drop	Unknown
3	Abandoned wire spool and service drop	Unknown
4	Exposed service drop	Unknown
6, 26, 63, 103, 117	Pole exhibiting excessive lean	PG&E
9	Pole exhibiting excessive lean and missing guy guard	PG&E
10, 28	Exposed ground wire	Unknown
13	Broken lashing	Unknown
56	Abandoned pole	Unknown
56	Exposed ground wire	Sacramento Municipal Utility District (SMUD)
94	Significant damage at pole base	PG&E
25, 97	Slack down guy	PG&E
119	Incomplete pole transfer (buddy pole)	AT&T

Response: Repair tickets were issued and notifications sent to the appropriate third-party utility. See the file "CPUC Sacramento Audit Tickets Issued.xls".

If you have any questions, please do not hesitate to contact me at 214-724-7719, or judy.geise@verizon.com.

Sincerely,

/s/ Judy Geise
Manager, Regulatory
Frontier
judy.geise@verizon.com

Attachment

cc:

Lee Palmer, Deputy Executive Director, Safety Policy and Water Division, CPUC
Koko Tomassian, Director, Safety and Enforcement Division (SED), CPUC
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