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

SENT VIA ELECTRONIC MAIL

March 8, 2024

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

Re: Frontier's Response to Riverside County West Service Area Audit

Dear Fadi Daye,

Frontier California Inc (U-1002-C) ("Frontier") hereby responds to the California Public Utilities Commission (Commission) report regarding the Riverside County West Service Area communications infrastructure provider audit conducted January 8, 2024, to January 12, 2024.

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO95, Rule 80, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards §(A)(1), states in part:

> *Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.*

Frontier's records indicated that for the calendar year 2023, Frontier had completed 2 repair work orders after their scheduled completion dates. Additionally, at the time of the audit, there were 104 open repair work orders that were past their scheduled completion dates.

Response: Frontier is prioritizing the open tickets in Lake Elsinore, Hemet and Idyllwild for completion no later than within the next 60-90 days. These three locations comprise approximately 84% of the open tickets. The remaining locations will be completed under the same timeline.

GO95, Rule 44.1, Installation and Reconstruction, states in part:

> *Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*

SED staff discovered the following discrepancies between Frontier's pole loading records and conditions in the field:

- The pole loading records for Pole No. 4784303E indicated that the pole supported only one communications conductor at a height of 36 feet. My staff observed that the pole actually supported two communications conductors at heights of 26 and 28 feet.

  Response: A more recent project for Pole No. 4784303E was not reflected in the submitted pre-audit data request. Please see attached file "Confidential LOAD REPORT_REV 2.26.24_Redacted.pdf" for loading re-fielded 2/26/24.

- My staff observed a span guy wire attached to the north side of Pole No. 4784302E which was not accounted for in the pole loading calculations provided.

  Response: A more recent project for Pole No. 4784302E was not reflected in the submitted pre-audit data request. Please see attached file "Confidential LOAD REPORT_REV 2.26.24_Redacted.pdf" for loading re-fielded 2/26/24.

III. Field Inspections

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection:

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:

- 4784303E
- 2328276E

Response: Repair tickets issued. See attached "2024 Riverside Audit tickets.pdf"

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. 212302S was located at a height of less than eight feet.

Response: Repair ticket issued. See attached "2024 Riverside Audit tickets.pdf"

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 observed on the following poles:

- Pole No. 4771120E supported an unauthorized "Free Junk Car Removal" sign.
- Pole No. 4799724E supported an unauthorized sign advertising a yard sale.
- Pole No. 4299391E supported an unauthorized fence post that had been nailed to the pole.
- Pole No. 4151042E supported an unauthorized "Free Junk Car Removal" sign.
- Pole No. 4958110E supported an unauthorized "Missing Dog" sign.
- Pole No. 2245447E supported an unauthorized speed limit sign.
- Pole No. 2328276E supported an unauthorized sign advertising a trust and will service.
- Pole No. 250002 supported an unauthorized street sign.
- Pole No. 250012 supported an unauthorized thermometer.

Response: Repair tickets issued. See attached "2024 Riverside Audit tickets.pdf"

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.*

Damaged visibility strips were observed on each of the following poles:

- 4059453E
- 250012
- 4607462E
- The cover to the terminal on Pole No. 4317657E was not properly secured to the terminal.
- The P-clamp on a service drop from Pole No. GT140480 had become detached.
- The lashing wire south of Pole No. 4958110E was damaged.
- The riser conductor on Pole No. 2245447E had detached from the pole.
- The splice case on Pole No. 4710897E was missing its cover.
- The copper splice on Pole No. 4710897E was not properly secured to the span wire and was dangling from one end.
- The housing of the pole-mounted terminal on Pole No. 4871208E was slightly open.
- The terminal box attached to Pole No. 4819427E was not properly secured to the pole.
- The pole-mounted fiber terminal attached to Pole No. 13817CWT was not properly secured to the pole.
- The pole-mounted terminal on Pole No. 216743S was damaged.

Response: Repair tickets issued. See attached "2024 Riverside Audit tickets.pdf"

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 span guy wire west of Pole No. 2328276E.

Response: Repair ticket issued. See attached "2024 Riverside Audit tickets.pdf"

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:

- 4791515E
- 17347
- 2014492E
- 311796

Response: Repair tickets issued. See attached "2024 Riverside Audit tickets.pdf"

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 third-party communications conductors on or near each of the following poles:

- 2139796E
- 213978S
- 4524024E
- GT60807
- 4299391E
- 216745S
- 17343CWT
- 4958110E
- 4524476E
- 19805CWT
- 19808CWT
- 4715458E
- 1971052E
- 4938481E
- 4938480E
- 4938476E
- 4869669E
- 2012060E
- 4819427E
- 4632116E
- 13818CWT
- 13817CWT

Response: Repair ticket issued. See attached "2024 Riverside Audit tickets.pdf"

GO 95, Rule 84.8-C3b: Above Ground in Areas Accessible to Pedestrians Only, states in part:

> *Residential Premises: 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.*

Frontier communications conductors on or near the following poles passed over private yards at a height of less than 8 feet 6 inches:

- 4060489E
- 17343CWT

Response: Repair tickets issued. See attached "2024 Riverside Audit tickets.pdf"

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.

- Hand-hole T2626290 was full of earth and debris.
- The base of the pedestal at 15250 Canyonstone Drive was damaged.
- The lid of Combination Structure 6234B was damaged.
- The locking mechanism and lid of Combination Structure T116662 were damaged and/or broken.

Response: Repair tickets issued. See attached "2024 Riverside Audit tickets.pdf"

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:

- The Pedestal at 15340 Canyonstone Drive
- Combination Structure No. T116668
- Combination Structure No. 6234B
- Combination Structure No. T116662

Response: Repair tickets issued. See attached "2024 Riverside Audit tickets.pdf"

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 the "flower pot" at 24077 Stonebridge Court was unsecured.

Response: Repair ticket issued. See attached "2024 Riverside Audit tickets.pdf"

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, Compliance
Judy.geise@ftr.com

Cc: Jenny Smith, Director Regulatory & Governmental Affairs, Frontier
Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC
Sultan Tipu, Utilities Engineer, ESRB, SED, CPUC