

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 3, 2015

CA2014-012

Mr. Charlie Born
Manager of Government and External Affairs
Frontier Communications
9260 East Stockton Blvd
Elk Grove, CA 95624

SUBJECT: Audit of Frontier Communications - Susanville District

Dear Mr. Born:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Raymond Cho, Jamie Lau, and Derek Fong of my staff conducted a Communication Infrastructure Provider (CIP) audit of Frontier Communications' Susanville District from October 27-31, 2014. The audit included a review of Frontier's records and field inspections of the Susanville District's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than March 6, 2015 by electronic or hard copy, of all corrective measures taken by Frontier Communications to remedy and prevent such violations. We also request that you include, in your reply, pole loading calculations for the joint poles on Main Street in Susanville between Church and Orchard Streets.

If you have any questions concerning this audit please contact Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Fadi Daye".

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

Enclosure: Audit Findings

CC: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC
Charlotte TerKeurst, Program Manager, Safety and Enforcement Division, CPUC
Alok Kumar, Senior Utilities Engineer (Supervisor), ESRB, CPUC
Derek Fong, Acting Senior Utilities Engineer (Supervisor), ESRB, CPUC
Raymond Cho, Utilities Engineer, ESRB, CPUC
Jamie Lau, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

Company: Frontier Communications – Susanville District

CIP Audit

Date: October 27-31, 2014

1.	Location:	Project No. 510-6015, 510-8735, 510-5454
	Equipment No.:	N/A
	Previous Frontier Visit Details:	8/7/13, 11/30/13, 8/17/13
	Date of CPUC Inspection:	10/30/14
Explanation of Violation(s):		
<p><u>Late Projects</u></p> <p>GO 95, Rule 31.1: Design, Construction and Maintenance, states in part:</p> <p><i>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.</i></p> <p>Construction project number 510-6015 was not completed by the estimated completion date of 8/7/13 and was still pending at the time of our visit. Project number 510-8735 was not completed by the estimated completion date of 11/30/13. Project number 510-5454 was not completed by the estimated completion date of 8/17/13.</p>		

The following violations were not documented and/or addressed by Frontier Communications during its last detailed inspection as required by General Order (GO) 95:

2.	Location:	Pole No. 104066, 104095
	Equipment No.:	N/A
	Previous Frontier Visit Details:	9/1/14 – 10/27/14
	Date of CPUC Inspection:	10/29/14
Explanation of Violation(s):		
<p><u>Missing Ground Moulding</u></p> <p>GO 95, Rule 84.6-B: Ground Wires, states in part:</p> <p><i>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 distance be less than 7 feet.</i></p> <p>A Frontier ground molding was missing.</p>		

3.	Location:	Pole No. 104075
Equipment No.:		N/A
Previous Frontier Visit Details:		9/1/14 – 10/27/14
Date of CPUC Inspection:		10/29/14
Explanation of Violation(s):		
<p><u>Insufficient Clearance from CATV Service</u></p> <p>GO 95, Rule 38, Table 2, Case 8C, requires 12 inches vertical separation between communication conductors.</p> <p>A Frontier cable had less than 12 inches vertical separation from a CATV service drop.</p>		

4.	Location:	Pole No. 104096
	Equipment No.:	N/A
	Previous Frontier Visit Details:	9/1/14 – 10/27/14
	Date of CPUC Inspection:	10/29/14
Explanation of Violation(s):		
<p><u>Low Service Drop Along Thoroughfare</u></p> <p>GO 95, Rule 37, Table 1, Case 4B, requires 15 feet aboveground clearance of communication conductors in rural areas.</p> <p>A Frontier conductor had less than 15 feet above ground clearance.</p>		

5.	Location:	Pole No. 104066
Equipment No.:		N/A
Previous Frontier Visit Details:		9/1/14 – 10/27/14
Date of CPUC Inspection:		10/29/14
Explanation of Violation(s):		
<p><u>Ground Rod Above Ground</u></p> <p>GO 95, Rule 92.4-C(2)(c), states in part:</p> <p style="padding-left: 40px;"><i>Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground.</i></p> <p>A section of the ground rod was above ground indicating that the top of the ground rod did not have a minimum depth of one foot below the surface of the ground.</p>		

6.	Location:	Pole No. 104087
Equipment No.:		N/A
Previous Frontier Visit Details:		9/1/14 – 10/27/14
Date of CPUC Inspection:		10/29/14
Explanation of Violation(s):		
<p><u>Climbing Space Impeded</u></p> <p>GO 95, Rule 84.7: Climbing Space, states in part:</p> <p><i>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 and 87.4–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 .</i></p> <p>Vines were interfering with the climbing space.</p> <p><u>Safety Hazard Notification</u></p> <p>GO 95, Rule 18B Notification of Safety Hazards, states in part:</p> <p><i>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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery. To the extent the inspecting company cannot determine the facility owner/operator , it shall contact the pole owner(s), who shall be responsible for promptly notifying the company owning/operating the facility with the safety hazard(s), normally not to exceed five business days after being notified of the safety hazard.</i></p> <p>Frontier discovered vines were in contact with Lassen Municipal Utility District's (LMUD) ground wire and did not notify LMUD of the hazard.</p>		

7.	Location:	Pole No. 104086
Equipment No.:		N/A
Previous Frontier Visit Details:		9/1/14 – 10/27/14
Date of CPUC Inspection:		10/29/14
Explanation of Violation(s):		
<p><u>Damaged Guy Guard</u></p> <p>GO 95, Rule 86.9: Guy Marker (Guy Guard), states in part:</p> <p><i>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.</i></p> <p>The guy guard was damaged.</p>		

8.	Location:	700 Brashear St
Equipment No.:		N/A
Previous Frontier Visit Details:		9/1/14 – 10/27/14
Date of CPUC Inspection:		10/28/14
Explanation of Violation(s):		
<p><u>Damaged Guy Guard</u></p> <p>GO 95, Rule 86.9: Guy Marker (Guy Guard), states in part:</p> <p><i>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.</i></p> <p>The guy guard was damaged.</p>		