

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 18, 2021

CA2021-924

Amy Warshauer
Manager – Government & External Affairs
Frontier Communications
2535 West Hillcrest Drive
Newbury, CA 91320

SUBJECT: Audit of Frontier Communications' Camarillo District

Ms. Warshauer:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Mily Vaidya and Kyle King of my staff conducted a Communication Infrastructure Provider (CIP) audit of Frontier Communications' Camarillo District from July 12, 2021, to July 16, 2021. The audit included a review of Frontier Communications' inspection and maintenance records and a field inspection of Frontier Communications' 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 November 18, 2021, by electronic or hard copy, of all corrective measures taken by Frontier Communications to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Mily Vaidya at (213) 999-8528 or Mily.Vaidya@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: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Mily Vaidya, Utilities Engineer, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed 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 Number	Type of Structure	City
1	GT135795	Pole	Camarillo
2	1332821E	Pole	Camarillo
3	1332820E	Pole	Camarillo
4	1332819E	Pole	Camarillo
5	1332818E	Pole	Camarillo
6	1332817E	Pole	Camarillo
7	1332816E	Pole	Camarillo
8	1332814E	Pole	Camarillo
9	1297003E	Pole	Camarillo
10	1297002	Pole	Camarillo
11	1769727E	Pole	Oxnard
12	1769726E	Pole	Oxnard
13	X5434	Pole	Oxnard
14	X5424	Pole	Oxnard
15	X5414	Pole	Oxnard
16	X5404	Pole	Oxnard
17	4923545E	Pole	Oxnard
18	4923527E	Pole	Oxnard
19	1344914E	Pole	Oxnard
20	4923528E	Pole	Oxnard
21	1666007E	Pole	Sonis
22	794019E	Pole	Sonis
23	794018E	Pole	Sonis

24	1633683E	Pole	Sonis
25	4521065E	Pole	Sonis
26	1053358E	Pole	Sonis
27	501691E	Pole	Sonis
28	2359114E	Pole	Sonis
29	2359113E	Pole	Sonis
30	2296058E	Pole	Sonis
31	1633684E	Pole	Sonis
32	794020E	Pole	Sonis
33	4630283E	Pole	Camarillo
34	166110E	Pole	Camarillo
35	1666109E	Pole	Camarillo
36	1666108E	Pole	Camarillo
37	1666107E	Pole	Camarillo
38	1666106E	Pole	Camarillo
39	1666105E	Pole	Camarillo
40	1666112E	Pole	Camarillo
41	THOKCAFHH31	Pole	Thousand Oaks
42	3004195E	Pole	Thousand Oaks
43	4251347E	Pole	Thousand Oaks
44	859312E	Pole	Thousand Oaks
45	859313E	Pole	Thousand Oaks
46	859314E	Pole	Thousand Oaks
47	859315E	Pole	Thousand Oaks
48	859316E	Pole	Thousand Oaks
49	T431Y	Pole	Thousand Oaks
50	T432Y	Pole	Thousand Oaks
51	GT257208	Pole	Thousand Oaks
52	466	Pole	Thousand Oaks
53	2685 Los Robles Rd.	Pole	Thousand Oaks
54	12723	Pole	Thousand Oaks
55	4047170E	Pole	Thousand Oaks
56	T1196Y	Pole	Thousand Oaks
57	118454	Pole	Thousand Oaks
58	1473434E	Pole	Thousand Oaks
59	VZ118478	Pole	Thousand Oaks
60	VZ18456	Pole	Thousand Oaks
61	4729730E	Pole	Thousand Oaks
62	GT258632	Pole	Thousand Oaks

63	4557978E	Pole	Thousand Oaks
64	2214205E	Pole	Thousand Oaks
65	2214204E	Pole	Thousand Oaks
66	1238675E	Pole	Thousand Oaks
67	498	Pole	Thousand Oaks
68	118457	Pole	Thousand Oaks
69	717461E	Pole	Thousand Oaks
70	1603043E	Pole	Thousand Oaks
71	1931945E	Pole	Newbury Park
72	1931942E	Pole	Newbury Park
73	1931941E	Pole	Newbury Park
74	1931940E	Pole	Newbury Park
75	1931939E	Pole	Newbury Park
76	1931938E	Pole	Newbury Park
77	1931937E	Pole	Newbury Park
78	GT46718	Pole	Newbury Park
79	1931946E	Pole	Newbury Park
80	1976730E	Pole	Newbury Park
81	2102463E	Pole	Newbury Park
82	1940404E	Pole	Newbury Park
83	1940403E	Pole	Newbury Park
84	1940402E	Pole	Newbury Park
85	1940401E	Pole	Newbury Park
86	4836002E	Pole	Newbury Park
87	174136E	Pole	Santa Paula
88	4300011E	Pole	Santa Paula
89	174137E	Pole	Santa Paula
90	799190E	Pole	Santa Paula
91	487583E	Pole	Santa Paula
92	174139E	Pole	Santa Paula
93	174140E	Pole	Santa Paula
94	799194E	Pole	Santa Paula
95	120968E	Pole	Santa Paula
96	GT111653	Pole	Santa Paula
97	P2588Y	Pole	Santa Paula
98	196068E	Pole	Santa Paula
99	T3982	Pole	Santa Paula
100	1649325E	Pole	Santa Paula
101	804133E	Pole	Camarillo
102	2323682E	Pole	Camarillo

103	4084564E	Pole	Camarillo
104	804132E	Pole	Camarillo
105	804131E	Pole	Camarillo
106	X13345Y	Pole	Camarillo
107	PB216B	Vault	Camarillo
108	260 Bent Twig Ave.	Handhole	Camarillo
109	184453	Handhole	Camarillo
110	334B	Manhole	Camarillo
111	333B	Manhole	Camarillo
112	332B	Manhole	Camarillo
113	331B	Manhole	Camarillo
114	280B	Manhole	Camarillo
115	335B	Manhole	Camarillo
116	292B	Vault	Camarillo
117	293B	Vault	Camarillo
118	294B	Vault	Camarillo
119	291B	Vault	Camarillo
120	289B	Vault	Camarillo
121	288B	Vault	Camarillo
122	287B	Vault	Camarillo
123	3800 Calletecate	Handhole	Camarillo
124	714B	Manhole	Camarillo
125	712B	Manhole	Camarillo
126	713B	Manhole	Camarillo

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.

Frontier's facilities attached to each of the following poles required maintenance:

- 1297003E – there was a loose communications conductor
- 4084564E – a communications service drop was not secured
- 174136E – a pole step was damaged

GO 95, Rule 31.6, Abandoned Lines, states in part:

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.

Frontier communication conductors attached to each of the following poles were abandoned:

- 1332819E
- 1332817E
- 1769727E
- X541Y
- X540Y
- 1344914E
- 118457
- 120968E

GO 95, Rule 91.3B, 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.

A pole step attached to Pole number 799194E was less than 8 feet above ground.

GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Case 8, Column C, requires the minimum vertical separation between communications conductors on separate crossarms or other supports at different levels on the same pole and in adjoining midspans to be 12 inches.

The vertical separation between a Frontier communications conductor and a third-party communications conductor on each of the following poles was less than 12 inches:

- 1332820E
- 1332818E
- 1332816E

GO 95, Rule 56.2, Uses (Guy Wires), 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:

- X540Y
- 794018E
- 1473434E

GO 95, Rule 84.6-B, Ground Wires, states in part:

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.

The Frontier Communications ground moulding attached to each of the following poles was damaged:

- 1769727E
- X543Y
- 2359113E
- 2296058E
- 466
- 12723
- GT46718
- 174137E
- 174139E
- P2588Y

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 by:

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8.

The Frontier riser casing attached to Pole number 174140E was damaged.

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 advertising signs were attached to each of the following poles:

- 1931945E
- 1931942E

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 Frontier underground facilities were not maintained for their intended use:

- 293B – the structure was rusted and corroded
- 331B – communications cables were submerged in water
- 332B – a hook supporting a cable was rusted