

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 2, 2014

Charlie Born
Manager, Government and External Affairs
Frontier Communications
9260 E. Stockton Boulevard
Elk Grove, CA 95624

CPUCID: CA2013-001

SUBJECT: CIP Audit of Frontier Communications (Frontier)

Dear Mr. Born:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong of my staff conducted an audit of Frontier from October 14, 2013 to October 18, 2013. The audit included a review of Frontier's records and field inspections of Frontier's facilities.

During the audit, we identified violations of General Orders (GO) 95. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than January 10, 2014, by electronic or hard copy, of all corrective measures taken by Frontier to remedy and prevent such violations.

If you have any questions, you can contact Derek Fong at (213) 576-6850 or derek.fong@cpuc.ca.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Raymond Fugere".

Raymond Fugere, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Audit Summary

Cc: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division
Fadi Daye, P.E., Senior Utilities Engineer Supervisor, CPUC – LA

AUDIT SUMMARY

1.	Location:	Pole No. FTR618650
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<p><u>Communications Cable in Frontier Climbing Space</u></p> <p>GO 95, Rule 18-A1c: Resolution of Safety Hazards and General Order 95 Nonconformances, States in part:</p> <p style="text-align: center;"><i>Where a communications company's or an electric utility' actions results in GO nonconformances for another entity, that entity's remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.</i></p> <p>A communications cable was installed in Frontier's climbing space. This violation was not noted or addressed when Frontier last inspected the pole. Furthermore, Frontier did not notify the communications company of the identified nonconformance.</p>		
2.	Location:	Pole No. FTR618750
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<p><u>Frontier Down Guy Wire Not Taut</u></p> <p>GO 95, Rule 56.2, States in part:</p> <p style="text-align: center;"><i>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.</i></p> <p>A Frontier down guy wire was not taut. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

3.	Location:	Pole No. FTR618765
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier and CATV Service Drops Touching</u>		
GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:		
<i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i>		
A Frontier service drop had less than a 3 inch radial separation from a communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Frontier last inspected the pole.		

4.	Location:	Pole No. FTR618766
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Insufficient Clearance between Frontier Cable and SCE 0-750 V Supply Cable</u>		
GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:		
<i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i>		
A Frontier communications cable had less than a 3 foot vertical clearance at mid-span from an SCE 0-750 V supply cable. This violation was not noted or addressed when Frontier last inspected the pole.		

5.	Location:	Pole No. FTR618679
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier and CATV Service Drops Touching</u>		
<p>GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:</p> <p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>A Frontier service drop had less than a 3 inch radial separation from a communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

6.	Location:	Pole No. FTR618785
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier Down Guy Wire Not Taut</u>		
<p>GO 95, Rule 56.2, States in part:</p> <p style="text-align: center;"><i>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.</i></p> <p>A Frontier down guy wire was not taut. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

7.	Location:	Pole No. FTR618687
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Broken CATV Lashing Wire</u>		
<p>GO 95, Rule 18-B: Notification of Safety Hazards, States in part:</p> <p style="text-align: center;"><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.</i></p> <p>A communications cable had a broken lashing wire. This violation was not noted or addressed when Frontier last inspected the pole. Furthermore, Frontier did not notify the communications company of the identified safety hazard.</p>		

8.	Location:	Pole No. FTR618695
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Communications Cable in Frontier Climbing Space</u>		
<p>GO 95, Rule 18-A1c: Resolution of Safety Hazards and General Order 95 Nonconformances, States in part:</p> <p style="text-align: center;"><i>Where a communications company's or an electric utility' actions results in GO nonconformances for another entity, that entity's remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.</i></p> <p>A communications cable was installed in Frontier's climbing space. This violation was not noted or addressed when Frontier last inspected the pole. Furthermore, Frontier did not notify the communications company of the identified nonconformance. Frontier corrected the nonconformance during the audit.</p>		

9.	Location:	Pole No. FTR618698
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier and CATV Service Drops Touching</u>		
<p>GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:</p> <p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>A Frontier service drop had less than a 3 inch radial separation from a communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

10.	Location:	Pole No. FTR618699
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Inadequate Clearance between Frontier Service Drop and SCE Service Drop</u>		
<p>GO 95, Rule 84.8-D4: Clearances between Conductors, States in part:</p> <p style="text-align: center;"><i>The radial clearance between communication service drop conductors and supply service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.</i></p> <p>A Frontier service drop and an SCE service drop had less than a 1 foot radial clearance within 15 feet from the point of attachment of either service drop. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

11.	Location:	Pole No. FTR618703
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Inadequate Clearance of Frontier Service Drop Above Curb Line</u>		
<p>GO 95, Rule 84.8-C1: Clearances above Ground and Buildings, States in part:</p> <p style="text-align: center;"><i>Above Public Thoroughfares: Vertical clearance shall not be less than 18 feet. EXCEPTION: Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line.</i></p> <p>A Frontier service drop had less than the minimum required vertical clearance of 16 feet above the curb line. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

12.	Location:	Pole No. FTR618514
	Previous Frontier Visit Details:	9/11/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier and CATV Service Drops Touching</u>		
<p>GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:</p> <p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>A Frontier service drop had less than a 3 inch radial separation from a communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

Insufficient Clearance of Frontier Service Drop Above a Pedestrian-Accessible Area

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

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.

A Frontier service drop had less than the minimum required clearance of 8 feet, 6 inches above an area that is only accessible to pedestrians. This violation was not noted or addressed when Frontier last inspected the pole.

13.	Location:	Pole No. VZ273829
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Damaged Ground Molding</u>		
GO 95, Rule 84.6-B: Ground Wires, States in part:		
<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>		
A Frontier ground molding was damaged. This violation was not noted or addressed when Frontier last inspected the pole.		

14.	Location:	Pole No. FTR615879
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Exposed CATV Ground Wire at the Public Level</u>		
GO 95, Rule 18-B: Notification of Safety Hazards, States in part:		
<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.</i>		
A communications ground wire was protruding at the public level. This violation was not noted or addressed when Frontier last inspected the pole. Furthermore, Frontier did not notify the communications company of the identified safety hazard.		

15.	Location:	Pole No. FTR615880
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier Service Drop Contacting SCE Down Guy Wire</u>		
GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:		
<i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i>		
A Frontier service drop had less than the minimum required radial separation of 3 inches from an SCE down guy wire. This violation was not noted or addressed when Frontier last inspected the pole.		

16.	Location:	Pole No. FTR615867
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Damaged Ground Molding</u>		
GO 95, Rule 84.6-B: Ground Wires, States in part:		
<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>		
A Frontier ground molding was damaged. This violation was not noted or addressed when Frontier last inspected the pole.		

17.	Location:	Pole No. FTR615869
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Insufficient Clearance of CATV Service Drop Above a Pedestrian-Accessible Area</u>		
GO 95, Rule 18-B: Notification of Safety Hazards, States in part:		
<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.</i>		
A communications service drop had a 4 foot ground clearance in an area that is accessible to pedestrians. This violation was not noted or addressed when Frontier last inspected the pole. Furthermore, Frontier did not notify the communications company of the identified safety hazard.		

18.	Location:	Pole No. FTR615873
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier Service Drop Contacting an SCE Down Guy Wire</u>		
<p>GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:</p> <p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>A Frontier service drop had less than the minimum required radial separation of 3 inches from an SCE down guy wire. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

19.	Location:	Pole No. FTR615856
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier and CATV Service Drops Touching</u>		
<p>GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:</p> <p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>A Frontier service drop had less than a 3 inch radial separation from a communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

20.	Location:	Pole No. FTR618546
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier and CATV Service Drops Touching</u>		
<p>GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:</p> <p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>A Frontier service drop had less than a 3 inch radial separation from a communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

21.	Location:	Pole No. FTR618539
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Inadequate Clearance between Frontier Service Drop and SCE Service Drop</u>		
<p>GO 95, Rule 84.8-D4: Clearances between Conductors, States in part:</p> <p style="text-align: center;"><i>The radial clearance between communication service drop conductors and supply service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.</i></p> <p>A Frontier service drop and an SCE service drop had less than a 2 foot radial clearance more than 15 feet from the point of attachment of either service drop. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

22.	Location:	Pole No. FTR618537
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier and CATV Service Drops Touching</u>		
GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:		
<p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p>		
A Frontier service drop had less than a 3 inch radial separation from a communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Frontier last inspected the pole.		

23.	Location:	Pole No. FTR618534
	Previous Frontier Visit Details:	9/17/2013
	Date of CPUC Inspection:	10/15/2013
Explanation of Violation(s):		
<u>Frontier Service Drop Broken Off from Insulator Attachment</u>		
GO 95, Rule 31.1: Design, Construction, and Maintenance, States in part:		
<p style="text-align: center;"><i>For all particulars not specified in General Order 95, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions.</i></p>		
A Frontier service drop broke off from its attachment to an insulator. This violation was not noted or addressed when Frontier last inspected the pole.		

24.	Location:	Pole No. VZ273792
	Previous Frontier Visit Details:	10/7/2013
	Date of CPUC Inspection:	10/17/2013
Explanation of Violation(s):		
<u>Palm Trees Straining Frontier Communications Cable and Causing Pole to Lean</u>		
<p>GO 95, Rule 35: Vegetation Management, States in part:</p> <p style="text-align: center;"><i>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).</i></p> <p>A Frontier communications cable, along with the associated pole, was strained by palm trees. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

25.	Location:	Pole No. FTR624625
	Previous Frontier Visit Details:	10/4/2013
	Date of CPUC Inspection:	10/17/2013
Explanation of Violation(s):		
<u>Missing Down Guy Marker</u>		
<p>GO 95, Rule 86.9: Guy Marker (Guy Guard), States in part:</p> <p style="text-align: center;"><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.</i></p> <p>A Frontier down guy wire was missing a guy marker. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

26.	Location:	Pole No. FTR624614
	Previous Frontier Visit Details:	10/4/2013
	Date of CPUC Inspection:	10/17/2013
Explanation of Violation(s):		
<u>Insufficient Clearance of Frontier Service Drop Above a Pedestrian-Accessible Area</u>		
<p>GO 95, Rule 84.8-C3b: Above Ground in Areas Accessible to Pedestrians Only, States:</p> <p style="text-align: center;"><i>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.</i></p> <p>A Frontier service drop had less than the minimum required clearance of 8 feet, 6 inches above an area that is only accessible to pedestrians. This violation was not noted or addressed when Frontier last inspected the pole.</p>		

27.	Location:	Pole No. FTR624731
	Previous Frontier Visit Details:	10/3/2013
	Date of CPUC Inspection:	10/17/2013
Explanation of Violation(s):		
<u>Frontier Down Guy Wire Not Taut</u>		
<p>GO 95, Rule 56.2, States in part:</p> <p style="text-align: center;"><i>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.</i></p> <p>A Frontier down guy wire was not taut. This violation was not documented when Frontier last inspected the pole.</p>		

28.	Location:	Pole No. FTR625273
	Previous Frontier Visit Details:	10/8/2013
	Date of CPUC Inspection:	10/17/2013
Explanation of Violation(s):		
<p data-bbox="204 527 816 562"><u>Frontier and CATV Service Drops Touching</u></p> <p data-bbox="204 600 1243 636">GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:</p> <p data-bbox="337 678 1435 747"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p data-bbox="204 789 1451 896">A Frontier service drop had less than a 3 inch radial separation from a communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Frontier last inspected the pole.</p>		