

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 2, 2022

CA2022-996

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

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Frontier North – Palo Cedro

Dear Ms. Warshauer:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez, Amanda Asadi, and Emiliano Solorio of ESRB conducted a CIP audit of Frontier North – Palo Cedro from January 24-28, 2022. During the audit, ESRB staff conducted field inspections of Frontier's communications facilities and reviewed pertinent documents and records.

As a result of the audit, ESRB identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than March 30, 2022, by electronic copy of all corrective actions and preventive measures taken by Frontier to correct the identified violations and prevent the recurrence of such violations. The response should indicate the date each remedial action and preventive measure was completed. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Sections II & IV, and field observations listed in Section V of the enclosed Audit Report.

Along with Frontier's audit response, please provide Frontier's intrusive pole inspection plan and projected completion dates for Tier 3 High Fire-Threat District (HFTD) areas in Frontier's northeastern service territory subject to this audit.

If you have any questions concerning this audit, please contact Brandon Vazquez at (415) 703-1076 or brandon.vazquez@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Banu Acimis'.

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

Enclosure: CPUC CIP Audit Report for Frontier North and Excel File for Past-Due Patrols and Late Tickets

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Rickey Tse, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC
Amanda Asadi, Utilities Engineer, ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC

**CPUC AUDIT FINDINGS OF
FRONTIER NORTH – PALO CEDRO AUDIT**

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) reviewed the following records:

- Frontier’s General Order (GO) 95 and GO 128 inspection programs.
- Frontier’s inspector training program.
- Patrol and detailed-inspection records for the last five years.
- Work order records for overhead and underground Frontier facilities.
- Third Party Safety Hazard notifications for the last five years.
- Pole loading and safety factor calculations completed in the last twelve months.
- New construction projects completed in the last twelve months.

II. Records Violations

ESRB observed the following violations during the record review portion of the audit:

1. GO 95, Rule 80.1-A(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District states in part:

“In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table.”

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

Commission Decision, D.17-12-024, under Ordering Paragraph #4 states, *“With the exception of implementations instructions set forth in Ordering Paragraphs 2 and 3, the new amended regulations adopted by today’s Decision that apply to Zone 1, Tier 2, and/or Tier 3 of the High Fire Threat District shall be:*

- i. Fully implemented in Tier 3 statewide by September 1, 2018, including full requirements pertaining to frequency of inspections ...*
- ii. Fully implemented in Tier 2 statewide by September 1, 2019, including full requirements pertaining to frequency of inspections ...”*

ESRB’s review of Frontier’s completed patrols and detailed inspections found that Frontier has two past-due Tier 3 patrols for two poles (Asset Numbers PLCD CU10-

0015-3 and SHTN PG200462FY-1) which were last patrolled on July 3, 2019.¹ Per Rule 80.1-A(1) and D.17-12-024, Frontier should have conducted patrols for both poles in 2020 and 2021.

2. 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.”*

ESRB’s review of Frontier’s tickets from November 1, 2016 to November 30, 2021 found that Frontier had 20 late-pending tickets and 157 late-closed tickets.² Late-pending tickets are pending tickets that have not been completed by their assigned due date based on their hazard level, and late-closed tickets are tickets that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 177 late tickets by hazard level, including the total number of late tickets, as well as late-pending and late-closed tickets, which are included in the total.

Table 1: Late Work Orders

Hazard Levels	Total Late Tickets	Late-Pending Tickets	Late-Closed Tickets
1	3	2	1
2	173	18	155
3	1	0	1
Total	177	20	157

¹ Refer to attached excel file “Past Due Patrols and Tickets” for the past-due patrols.

² Refer to attached excel file “Past Due Patrols and Tickets” for late tickets.

3. GO 128, Rule 17.2, Inspection states in part:

“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules.”

Frontier does not have procedures to ensure that all its underground communication facilities are subject to required inspections per Rule 17.2. Frontier only conducts inspections when responding to service requests and the facilities inspected consist of underground structures one span in each direction from the service location.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure #	Type of Structure	Location/Address	City
1	PLCD CU-1062-1	Joint Pole	10417 Deschutes Rd	Palo Cedro
2		Joint Pole	1 Pole south of Location 1	Palo Cedro
3		Joint Pole	Deschutes Rd and Coloma Dr	Palo Cedro
4	59	Joint Pole	Across from 10340 Lone Goose Ln	Palo Cedro
5	PLCD CU-0803-1	Joint Pole	21819 Coloma Dr	Palo Cedro
6	PLCD CU-02619-1	Joint Pole	Deschutes Rd and Oak Tree Ln	Palo Cedro
7	PG&E P22-467	Joint Pole	Old 44 Dr and Cedro Ln	Palo Cedro
8	GT 207901	Joint Pole	421 Martin Rd	Weaverville
9	GT 207902	Joint Pole	410 Martin Rd	Weaverville
10	VZ 88529	Joint Pole	375 Martin Rd	Weaverville
11	CTC 1158915	Joint Pole	Ransom Rd and Boudreaux Rd	Weaverville
12	CTC 1158916	Joint Pole	1 Pole south of Location 11	Weaverville
13	CTC 1158918	Joint Pole	2 Poles south of Location 11	Weaverville
14	CTC 1158919	Joint Pole	Boudreaux Rd and Wilson Rd	Weaverville
15	CTC 1158920	Joint Pole	111 Boudreaux Rd	Weaverville
16	GT 207834	Joint Pole	1 Pole west of Ransom Rd and Boudreaux Rd	Weaverville
17		Joint Pole	Oak Ave and E Humboldt St	Hayfork
18	CTC 1156731	Joint Pole	CA-3 and Oak Ave	Hayfork
19	CTC 1133500	Joint Pole	CA-3 and Oak Ave	Hayfork
20	CTC 1156733	Joint Pole	2 Poles south of CA-3 and Oak Ave	Hayfork
21	TPUD 9412	Joint Pole	W Humboldt St and Manzanita Ave	Hayfork
22	CTC 1156700	Joint Pole	134 W Humboldt St	Hayfork
23	CTC 1156756	Joint Pole	58 Donald St	Hayfork
24	GT 215963	Joint Pole	115 Marvel St	Hayfork
25	CTC 1156755	Joint Pole	20 Donald St	Hayfork
26	GT 215962	Joint Pole	123 Marvel St	Hayfork
27	TPUD 16805	Joint Pole	43 Marvel St	Hayfork
28	CTC 1156766	Frontier Pole	Marvel St and Forest Ave	Hayfork
29	CTC 1156764	Frontier Pole	Forest Ave and Shasta St	Hayfork
30		Pedestal	Forest Ave and Shasta St	Hayfork
31	203388	Frontier Pole	2 Poles north of CA-44 and Shasta Forest Dr	Shingletown
32	203488	Frontier Pole	1 Pole north of CA-44 and Shasta Forest Dr	Shingletown
33		Pedestal	Bent Hill Rd and 4 Wheel Dr	Shingletown

34	308613	Frontier Pole	CA-44 and Forest Rte 32N16	Old Station
35	308612	Frontier Pole	1 Pole west of Location 34	Old Station
36	308575	Frontier Pole	CA-44 and Battle Creek Rd	Old Station
37		Tree Attachment	East of Location 36	Old Station
38		Tree Attachment	East of Location 36	Old Station
39		Line	East of Location 36	Old Station
40	PG&E 121144255	Joint Pole	38412 Beresford Way	Mineral
41	PG&E 121144257	Joint Pole	38431 Beresford Way	Mineral
42	PG&E 121144252	Joint Pole	38390 Beresford Way	Mineral
43	PYCK 104	Frontier Pole	West of 27550 CA-36	Red Bluff
44	PYCK 103	Frontier Pole	27550 CA-36	Red Bluff
45	PYCK 109	Frontier Pole	40.3128, -122	Red Bluff
46	PYCK 110	Frontier Pole	1 Pole west of Location 45	Red Bluff
47	PYCK 111	Frontier Pole	2 Poles west of Location 45	Red Bluff
48	PYCK 112	Frontier Pole	1 Pole east of Location 49	Red Bluff
49	PYCK 113	Frontier Pole	40.312, -122.002	Red Bluff
50	683	Joint Pole	21698 Cottonwood St	Burney
51		Joint Pole	21706 Cottonwood St	Burney
52		Joint Pole	21722 Cottonwood St	Burney
53	681 C	Joint Pole	21730 Cottonwood St	Burney
54	PG&E 110494239	Joint Pole	21602 N Fairfield St	Burney
55	854	Joint Pole	21610 N Fairfield St	Burney
56	PG&E 151076	Joint Pole	Fairfield St and CA-299	Burney
57	PG&E 160263	Joint Pole	1 Pole south of Fairfield St and CA-299	Burney
58	T-2403	Telephone Network Interface	37581 Mountain View Rd	Burney
59		Pedestal	Across from 37581 Mountain View Rd	Burney
60		Joint Pole	36996 Oak St	Burney
61	PG&E 120787450	Joint Pole	36992 Oak St	Burney
62		Service Line	36993 Oak St	Burney
63	163	Joint Pole	36978 Oak St	Burney

64		Frontier Pole	(40.9339, -121.948) near Big Bend Rd and Cove Rd	Montgomery Creek
65		Frontier Pole	1 Pole north of Location 64	Montgomery Creek
66		Frontier Pole	2 Poles north of Location 64	Montgomery Creek
67	71	Frontier Pole	1 Pole south of Location 64	Montgomery Creek
68	123	Joint Pole	29230 Fenders Ferry Rd	Montgomery Creek
69	123	Pedestal	29230 Fenders Ferry Rd	Montgomery Creek
70		Joint Pole	1 Pole east of Location 68	Montgomery Creek
71		Joint Pole	2 Poles east of Location 68	Montgomery Creek
72	PG&E 120550984	Joint Pole	16456 Buzzard Roost Rd	Round Mountain
73	PG&E 121128171	Joint Pole	30260 Oak Run to Fern Rd	Oak Run
74	PG&E 121128170	Joint Pole	1 Pole west of Location 73	Oak Run
75	T 403	Pedestal	14388 Fern Rd E	Whitmore
76		Pedestal	14651 Fern Rd E	Whitmore
77		Joint Pole	1 Pole northeast of Location 78	Bella Vista
78	BLVS PG21586FY-1	Joint Pole	40.6558, -122.215	Bella Vista
79		Line	40.6435, -122.227	Bella Vista
80		Joint Pole	1 Pole southwest of Location 79	Bella Vista
81	568	Joint Pole	2 Poles southwest of Location 79	Bella Vista
82	BLVS 110538142	Joint Pole	40.6396, -122.235	Bella Vista
83	615	Joint Pole	22071 CA-299	Bella Vista
84		Joint Pole	22040 CA-299	Bella Vista
85		Joint Pole	22028 CA-299	Bella Vista
86	PG&E 120825731	Joint Pole	22005 CA-299	Bella Vista

IV. Field Inspection Violations

ESRB observed the following violations during the field inspection:

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.”

1.1) Frontier’s facilities need to be transferred to the new pole at 10417 Deschutes Rd in Palo Cedro (Location 1).

1.2) The lashing wire midspan at 10417 Deschutes Rd in Palo Cedro (Location 1) is loose.

1.3) Frontier’s facilities need to be transferred to the new pole at 21819 Coloma Dr in Palo Cedro (Location 5).

1.4) Frontier’s facilities need to be transferred to the new pole at Deschutes Rd and Oak Tree Ln in Palo Cedro (Location 6).

1.5) Frontier’s facilities need to be transferred to the new pole at Boudreaux Rd and Wilson Rd in Weaverville (Location 14).

1.6) Frontier’s facilities need to be transferred to the new pole located 1 pole west of Ransom Rd and Boudreaux Rd in Weaverville (Location 16).

1.7) Frontier’s facilities need to be transferred to the new pole at CA-3 and Oak Ave in Hayfork (Location 19).

1.8) Frontier’s facilities need to be transferred to the new pole located 2 poles south of CA-3 and Oak Ave in Hayfork (Location 20).

1.9) Frontier’s facilities need to be transferred to the new pole at 20 Donald St in Hayfork (Location 25).

1.10) An equipment box is open leaving wires exposed on the service pole at 43 Marvel St in Hayfork (Location 27).

1.11) The guy guard on the pole located 1 pole north of CA-44 and Shasta Forest Dr in Shingletown (Location 32) is damaged.

1.12) The lashing wire located 1 pole west of Location 34 in Old Station (Location 35) is broken midspan.

1.13) The lashing wire midspan at CA-44 and Battle Creek Rd in Old Station (Location 36) is loose.

1.14) At Locations 37 and 38, a Frontier line located east of Location 36 is attached to two trees with rope.

1.15) The lashing wire midspan at 38431 Beresford Way in Mineral (Location 41) is broken.

1.16) Frontier's facilities need to be transferred to the new pole at 36992 Oak St in Burney (Location 61).

1.17) Frontier's facilities need to be transferred to the new pole at 36978 Oak St in Burney (Location 63).

1.18) Frontier's line located 2 poles north of Location 64 in Montgomery Creek (Location 66) is missing insulation leaving wires exposed.

1.19) Frontier's line at GPS coordinates 40.6435, -122.227 in Bella Vista (Location 79) has two plastic bags covering sections of line requiring repair.

1.20) Frontier's line at 22028 CA-299 in Bella Vista (Location 85) is loose and hanging off the messenger wire.

2. GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground 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”

2.1) The service riser on the pole across from 10340 Lone Goose Ln in Palo Cedro (Location 4) is not covered or properly secured.

2.2) The service riser on the pole at 43 Marvel St in Hayfork (Location 27) is not properly secured or covered to 8 feet above ground.

3. 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.”

3.1) There is an abandoned Frontier service line on the ground at 111 Boudreaux Rd in Weaverville (Location 15).

3.2) There is an abandoned Frontier service line on the ground at 115 Marvel St in Hayfork (Location 24).

3.3) There is an abandoned Frontier service line hanging midspan at 38431 Beresford Way in Mineral (Location 41).

3.4) There is an abandoned Frontier service line on the ground at 36993 Oak St in Burney (Location 62).

3.5) There is an abandoned Frontier service line on the ground located 2 poles southwest of Location 79 in Bella Vista (Location 81).

3.6) There is an abandoned Frontier service line bundled and hanging off the pole at 22071 CA-299 in Bella Vista (Location 83).

4. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2 Case 8 Column C states in part:

“Minimum allowable vertical separation between conductors and/or cables, on supports at different levels on the same pole and in adjoining midspans for communication conductors is 12 inches.

***Exception:** Can be less than 12” for strand mounted terminals, splice cases and other equipment located 8” or more from the centerline of the pole, but not less than 1” with mutual agreement between affected owners.”*

4.1) The clearance between the Frontier line and cable tv line at W Humboldt St and Manzanita Ave in Hayfork (Location 21) is less than 12 inches.

4.2) A Frontier line is in contact with a cable tv line at 123 Marvel St in Hayfork (Location 26).

4.3) The clearance between the Frontier line and cable tv line at Marvel St and Forest Ave in Hayfork (Location 28) is less than 12 inches.

4.4) A Frontier line is in contact with a cable tv line at 21730 Cottonwood St in Burney (Location 53).

5. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

“Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.”

5.1) The pedestal at Forest Ave and Shasta St in Hayfork (Location 30) is missing an ownership sign.

5.2) The pedestal at Bent Hill Rd and 4 Wheel Dr in Shingletown (Location 33) is missing an ownership sign.

5.3) The pedestal across from 37581 Mountain View Rd in Burney (Location 59) is missing an ownership sign.

5.4) The pedestal at 29230 Fenders Ferry Rd in Montgomery Creek (Location 69) is missing an ownership sign.

5.5) The pedestal at 14388 Fern Rd E in Whitmore (Location 75) is missing an ownership sign.

5.6) The pedestal at 14651 Fern Rd E in Whitmore (Location 76) is missing an ownership sign.

6. GO 95, Rule 86.2, Guys, 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.”

6.1) The anchor guy on the pole located 1 pole north of CA-44 and Shasta Forest Dr in Shingletown (Location 32) is slacked.

6.2) The anchor guy at GPS coordinates 40.6558, -122.215 in Bella Vista (Location 78) is slacked.

7. GO 128, Rule 17.1, 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.

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 bonding strap in the pedestal at Bent Hill Rd and 4 Wheel Dr in Shingletown (Location 33) is incorrectly installed.

8. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 5 Column B states in part:

“The basic minimum allowable vertical clearance of a communication conductor and supply service drop in an above ground area accessible to pedestrians only is 10 feet.”

Exception (Rule 84.4-A(3)) Accessible to Pedestrians Only: *Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet.*

The Frontier line located east of Location 36 in Old Station (Location 39) is on the ground at midspan.

9. GO 95, Rule 35, Vegetation Management states in part:

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. 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). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule.”

9.1) A tree branch is growing into the messenger wire located 2 poles west of Location 45 in Red Bluff (Location 47).

9.2) There is vegetation strain/abrasion on Frontier’s line at 21706 Cottonwood St in Burney (Location 51).

9.3) There is vegetation strain/abrasion on Frontier’s line at 36996 Oak St in Burney (Location 60).

10. GO 95, Rule 91.3-B, Location of Steps states in part:

“The lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step.”

The pole step on the pole at 21730 Cottonwood St in Burney (Location 53) is low.

11. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2 Case 19C states in part:

“Minimum allowable radial separation between guys and span wires passing on conductors on the same pole is 3 inches.”

Frontier’s line is in contact with a PG&E anchor guy located 1 pole south of Fairfield St and CA-299 in Burney (Location 57).

V. Observations

ESRB staff observed the following third-party potential safety concerns during the field inspection:

GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities states in part:

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property...”

GO 95, Rule 18A, Resolution of Potential Violations of General Order 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 GO95.

Note: Each pole owner must be able to determine all other pole owners on poles it owns. Each pole owner must be able to determine all authorized entities that attach equipment on its portion of a pole.”

- 1) There is an abandoned cable tv underground service line on the ground at 58 Donald St in Hayfork (Location 23).
- 2) There is an abandoned cable tv service line on the ground at 115 Marvel St in Hayfork (Location 24).
- 3) An unlashd cable tv line is in contact with a Frontier line at 21602 N Fairfield St in Burney (Location 54).

4) An abandoned cable tv ground wire is cut and not attached to the bottom of the pole at Fairfield St and CA-299 in Burney (Location 56).

5) An abandoned cable tv service line located 1 pole south of Fairfield St and CA-299 in Burney (Location 57) is on the ground.

6) The cable tv line at GPS coordinates 40.6396, -122.235 in Bella Vista (Location 82) is less than 6 feet from primary conductors.