



May 31, 2024

VIA E-FILING

Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399

Re: 25-18.020 Pole Safety, Inspection, Maintenance, and Vegetation Management.

Dear Mr. Teitzman,

Pursuant to the Commission's rules, 25-18.020 of the Florida Administrative Code, Frontier Florida, LLC and Frontier Communications of the South, LLC ("Frontier") is providing this 2024 annual report.

To ensure the safety of its Florida operating facilities, during 2023, Frontier replaced 201 poles due to damage or safety issues. To further refine its facilities program, 2024 Frontier engaged a third-party contractor, Osmose Utilities Services, Inc., to oversee inspections of all Frontier utility poles in the state of Florida over the next two years.

Under the contractor agreement, Osmose will inspect 11,250 poles each year with a minimum of 2,813 poles inspected each quarter.

Frontier's program coordinator will work closely with Osmose to identify inspection locations, monitor inspection status and perform routine quality inspections. Osmose will perform inspections of Frontier's communication facilities in accordance with industry standards and identify National Electrical Safety Code (NESC) violations as appropriate. More specifically, this includes documenting visual and physical measurements, identifying primary and secondary power attachments, conducting Intrusive Inspections, placing FRONTIER ownership tags not otherwise identified, fixing minor infractions (pole tag kit, guy guards, visibility strips, ground moldings), removal of foreign attachments (ex: yard sale and lost pet signs) and inspecting for hazardous vegetative conditions.

For documentation purposes, Osmose will photograph each pole, verify the pole GPS coordinates, and submit inspection records in Frontier's facilities tracking systems.

Frontier's vegetation management program leverages Osmose conducted inspections, the vendor pole transfer process and Frontier conducted inspections. During 2023, Frontier vendors assessed vegetation for hazardous conditions in conjunction with 4,270 pole transfers. Vegetation was cleared from pole areas where appropriate. Additionally, Frontier operations conducted vegetation management inspections along 26 miles of designated Hillsborough County, Pasco County and Polk County locations.



The following identifies the pole inspection results as of May 25, 2024.

| 2024 | Results |
|--|---|
| i. Number of poles with public utility electrical facilities the CSP owned in whole or in part at the beginning and end of the calendar year | 94,209 total poles 23,291 with power |
| ii. Number of poles that were scheduled for inspection | 10,181 |
| iii. The number of poles that were actually inspected | 1,504 as of 5/25/2024 623 with power |
| iv. The number of poles that failed inspection | 626 315 with power |
| v. The number of poles strength tested and the methods used to ensure compliance with NESC strength requirements | 623 with power (resi-drill) |
| vi. The number of poles that failed strength testing | 315 with power |
| vii. The number of poles repaired and a summary of the repairs | 559 270 with power |
| viii. The number of poles replaced and the reason for replacement | 67 45 with power 45 failed strength testing; 22 damage or safety issues (pending replacement) |
| ix. The total miles of vegetation management performed | 2023 Vendor inspected vegetation in conjunction with 4, 270 pole transfers. Additionally, Frontier inspected 26 miles for vegetation impact. |
| 2025 | |
| i. The number of poles to be inspected; | 12,099 |
| ii. The total miles of vegetation management to be conducted | Osmose will incorporate vegetation management as part of 12,099 pole inspections. |



1919 McKinney Avenue, Dallas, TX 75201
Frontier.com

Should you have any questions regarding this submission, please do not hesitate to contact me at judy.geise@ftr.com or (214) 724-7719.

Respectfully submitted,

A handwritten signature in black ink that reads 'Judy Geise'.

Manager, Regulatory
(214) 724-7719
judy.geise@ftr.com