

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 22, 2022

CA2022-1022

Ross Johnson
Area Manager Regulatory Relations
AT&T North, 430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Shasta -Tehama

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Ogeonye Enyinwa and Joseph Murphy of ESRB conducted a CIP audit of AT&T Shasta-Tehama from October 10-14, 2022. During the audit, ESRB staff conducted field inspections of AT&T'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 January 20, 2023, by electronic copy of all corrective actions and preventive measures taken by AT&T 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.

If you have any questions concerning this audit, please contact Ogeonye Enyinwa at (415) 470-3504 or ogeonye.enyinwa@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 AT&T Shasta-Tehama Counties

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
Ogeonye Enyinwa, Senior Utilities Engineer, ESRB, SED, CPUC
Joseph Murphy, Utilities Engineer, ESRB, SED, CPUC

CPUC AUDIT FINDINGS
AT&T SHASTA-TEHAMA AUDIT
October 10 - 14, 2022

I. Records Review

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

- AT&T Communication Infrastructure Provider (CIP) statistics including miles of overhead (OH) line, miles of underground (UG) cable, number of OH poles (subject to General Order (GO) 95), number of UG structures (subject to GO 128), number of antennas (subject to GO 95), and number of customers.
- AT&T Shasta and Tehama service territory map.
- AT&T's GO 95 Rule 18 maintenance plan.
- Dates of Patrol and Detailed Inspection for the last five years.
- Procedures for Patrols and Detailed Inspections conducted in accordance with GO 95, Rule 80.1A
- Records of overhead corrective actions completed from August 1, 2017 to August 31, 2022 in accordance with GO 95, Rule 80.1-A4
- Findings that are currently pending corrective actions which were identified as a result of all OH/UG patrols and inspections from August 1, 2017 to August 31, 2022.
- Procedures for Intrusive Inspections of Wood Poles conducted in accordance with GO 95, Rule 80.1B.
- Incoming/Outgoing Third-Party Safety Hazard notifications for the last five years.
- List of AT&T Pole Loading Calculations (PLC) from 2021 and 2022.
- List of open and completed construction projects from 2021.

II. Records Violations

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

1. GO 95, Rule 80.1, Inspection of Lines states in part:

“Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.”

GO 95, Rule 80.1-A (1), Inspection Requirements for Communication Lines, Patrol and Detail Inspections, 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 ...shall not exceed the time specified in the following Table.”

Table 1: Tier 2 and 3 Inspection Intervals

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

“For the purpose of implementing the patrol and detailed inspection intervals in the above Table, the term “year” is defined as 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months, not to exceed the end of the calendar year in which the next inspection is due.”

ESRB staff reviewed AT&T’s inspection records and found a total of 27 past-due patrols. Table 2 below is a breakdown of the 27 past-due patrols for each hazard level.

Table 2: Late Patrol Inspections

Hazard Levels	Late Patrol	Inspection Interval
2	1	2 Years
3	26	1 Year
Total	27	--

Table 3 below identifies the most overdue patrols for each hazard level.

Table 3: Most Overdue Patrol and Detail Inspections

Hazard Levels	DA_PSA_CD Asset Number	Previous Patrol Date	Next Patrol Date	Days Late
2	R4120	01 Jun 2019	21 Oct 2021*	21
3	0887	30 Apr 2018	1 Sep 2019	31

*Detail inspection date.

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 staff reviewed AT&T’s work orders from August 1, 2017 through August 31, 2022. In its review, ESRB discovered that AT&T had created work orders but had assigned due dates that were later than the appropriate due dates for their hazard level. ESRB staff found 166 closed work orders that were assigned corrective action due dates past the dates required for their hazard level. ESRB staff also found 1,053 open work orders that were assigned corrective action due dates past the dates required for their hazard level. Table 4 below is a breakdown of the 1,219 late assigned corrective action due dates by hazard level.

Table 4: Late Assigned Corrective Action Due Dates Exceeding 18-B1(a)¹

Hazard Levels	Maximum Corrective Action Period (Months)	Number of Closed Work Orders with Late Assigned Corrective Action Due Dates	Number of Open Work Orders with Late Assigned Corrective Action Due Dates
2 (1)	6	50	23
2 (2)	12	3	133
2 (4)	36	1	146
3	60	112	751
Total	--	166	1,053

ESRB staff reviewed AT&T’s work orders from August 1, 2017, through August 31, 2022. ESRB staff found 331 late-pending work orders and 308 late-closed work orders. Late-pending work orders are pending work orders that have not been completed by their required due date based on their hazard level, and late-closed work orders are work orders that were completed past their required due date based on their hazard level. Table 5 below breaks down the 639 late work orders by hazard level, as well as late-pending and late-closed work orders.

¹ See AT&T’s response to Data Request #s. 10 & 12: "DR 10 – Tehama-Shasta-OH-UG-Completed" and from "DR12 – Shasta_Tehama_Open-RWM."

Table 5: Late Work Orders²

Hazard Levels	Total Late Work Orders	Late-Pending Work Orders	Late-Closed Work Orders
1	42	-	42
2 (1)	61	28	33
2 (2)	231	142	89
2 (3)	34	-	34
2 (4)	147	146	1
3	124	15	109
Total	639	331	308

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.”

ESRB found that AT&T does not have procedures to ensure that all its underground communication facilities are inspected frequently and thoroughly per GO 128, Rule 17.2. AT&T only conducts underground inspections when safety hazards or nonconformances are identified by AT&T during unrelated routine work or by a third party. However, the underground facilities inspected by AT&T are limited to facilities one span in each direction from the location of the safety hazard/non-conformance.

4. GO 95, Rule 18-A (5), Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

“A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party.”

ESRB staff reviewed AT&T’s incoming Third-Party Notifications (TPN) from August 1, 2017, through August 31, 2022. ESRB staff found 30 open TPN work orders were assigned corrective action due dates past the dates required for their hazard level. Table 6 below is a breakdown of the 30 late assigned corrective action due dates by hazard level.

² See AT&T’s response to Data Request #s. 10 & 12: "DR 10 – Tehama-Shasta-OH-UG-Completed" and from "DR12 – Shasta_Tehama_Open-RWM."

Table 6: Late Assigned Corrective Action Due Dates Exceeding 18-B1(a)³

Hazard Levels	Maximum Corrective Action Period (Months)	Number of Open Work Orders Exceeding Corrective Action Date*
2 (2)	12	3
2 (4)	36	6
3	60	21
Total	--	30

*As of August 31, 2022

ESRB staff reviewed AT&T’s incoming Third-Party Notifications (TPN) from August 1, 2017, through August 31, 2022. ESRB staff found nine late-pending work orders and 22 late-closed work orders. Late-pending work orders are pending work orders that have not been completed by their required due date based on their hazard level, and late-closed work orders are work orders that were completed past their required due date based on their hazard level. Table 7 below breaks down the 31 late work orders by hazard level, including the total number of late work orders, as well as late-pending and late-closed work orders, which are included in the total.

Table 7: Late Incoming TPN Work Orders⁴

Hazard Levels	Total Late Work Orders	Late-Pending Work Orders*	Late-Closed Work Orders
1	17	-	17
2 (1)	-	-	-
2 (2)	5	3	2
2 (3)	3	-	3
2 (4)	6	6	-
3	-	-	-
Total	31	9	22

*As of August 31, 2022

³ See AT&T’s response to Data Request #. 15: "DR 15 – Shasta_Tehama_TPNs_Incoming."

⁴ See AT&T’s response to Data Request #. 15: "DR 15 – Shasta_Tehama_TPNs_Incoming."

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure #	Structure Type	Structure Location/Address	City
1	PED 242	Pole	HWY 299/ 16177 Middle Creek	Redding
2	16307	Service Line	16307 Lower Springs Road	Redding
3	16327	Service Line	16327 Lower Springs Road	Redding
4	120978212	Pole	9365 Magic Circle	Redding
5	120824415	Pole	9365 Magic Circle	Redding
6	121228570	Pole	9365 Magic Circle	Redding
7	120768202	Pole	9365 Magic Circle	Redding
8	120039543	Pole		Redding
9	1055	Pole	1300 Ridge Drive	Redding
10	5150	Pole	1310 Ridge Drive	Redding
11	1320	Pole	1320 Ridge Drive	Redding
12	1330	Pole	1340 Ridge Drive	Redding
13	1350R	Pole	1350 Ridge Drive	Redding
14	233	Pole	1370 Ridge Drive	Redding
15	121174208	Pole	1392 Ridge Drive	Redding
16	E30 105	Pole	1410 Ridge Drive	Redding
17	1450	Pole	1440 Ridge Drive	Redding
18		Service Drop	1429 Ridge Drive	Redding
19	1056	Pole	1470 Ridge Drive	Redding
20	D30 117	Pole	1480 Ridge Drive	Redding
21	522	Pole	1522 Ridge Drive	Redding
22	D30 126	Pole	Between 1534 & 1550 Ridge Drive	Redding
23		Pole	7211 Lands Lane	Andersen
24	10383	Pole	7203 Lands Lane	Andersen
25		Pole	7203 Lands Lane	Andersen
26	110523077	Pole		Andersen
27	G6 & 110523076	Span Guy		Andersen
28	110523076	Pole		Andersen
29	110365583	Pole		Andersen
30		Pole	40°29'34" N 122°22'16"	Andersen
31		Pole	7143 Lands Lane	Andersen
32		Pole	Between 7136 & 7143 Lands Lane	Andersen
33		Pole	19733 Gas point	Cottonwood
34	121308783	Pole		Cottonwood
35	121308784	Pole		Cottonwood

36	121204214	Pole		Cottonwood
37		Pedestal	Lat: 40.3889638, Long: - 122.3244022	Cottonwood
38		ATT Equipment	Lat: 40.3892539 Long: - 122.3247134	Cottonwood
39	3 - 5	Pedestal	18080 Brincat Manor	Cottonwood
40		Service Line	Between 18275 & 18230 Vista Lane	Cottonwood
41	121182156	Pole	18275 Vista Lane	Cottonwood
42	121232861	Pole	18310 Vista Lane	Cottonwood
43	121232862	Pole	Vista Lane	Cottonwood
44	121182154	Pole	Vista Lane	Cottonwood
45		Pole	18285 Vista Lane	Cottonwood
46		Pole	22005 S. Wallen Road	Red Bluff
47	121162215	Pole	S. Wallen Road	
48		Pole	21963 S. Wallen Road	Red Bluff
49	112602001	Pole	S. Wallen Road	Red Bluff
50	110304530	Pole	21917 S. Wallen Road	Red Bluff
51		Pole	21980 S. Wallen Road	Red Bluff
52		Pole	Lat: 40.2438162, Long: - 122.2176211	Red Bluff
53		Pole	Entrance of 21980 S Wallen Road	Red Bluff
54	110304529	Service Drop	S. Wallen Road	
55		Pole	15950 S Wallen Road	Red Bluff
56		Pole	15945 Red Bank Road	Red Bluff
57		Service Drop	15950 Red Bank Road	Red Bluff
58		Pole		Red Bluff
59	120241598	Pole		Red Bluff
60		Pole	15925 Red Bank Road (Red Bank Cemetery)	Red Bluff
61	121245878	Pole	15920 Red Bank Road	Red Bluff
62	25-461- T40590331	Pole		Los Molinos
63		Pole	8750 Shasta Blvd	
64		Pole	8736 Shasta Blvd.	Los Molinos
65		Pole	Across from the 8730 Shasta Blvd.	Los Molinos
66		Pole	8730 Shasta Blvd.	Los Molinos
67	25-462- T40601059	Pole	8720 Shasta Blvd	Los Molinos
68		Pole	Lat: 40.0487533 Long: - 122.0921645	Los Molinos
69		Pole	Lat: 40.0502640 Long: - 122.0911204	Los Molinos

70		Pole	8801 Shasta Blvd.	Los Molinos
71	120962040	Pole	26205 Skeet Street	Los Molinos
72	120962039	Pole	8240 Sherwood Blvd.	Los Molinos
73	P46	Pole	8265 Sherwood Blvd.	Los Molinos
74	121001085	Pole	20655 Cedar Drive	Lakehead
75	121284740	Pole	20659 Cedar Drive	Lakehead
76	121284739	Pole	Pole span btw Pole IDs:121284739 & 121284740 on Cedar Drive	Lakehead
77	121069129	Pole	Cedar Drive	Lakehead
78	121314540	Pole	20694 Cedar Drive	Lakehead
79	121314540	Span	Pole span across Pole ID 121314540	Lakehead
80	121069128	Pole		Lakehead
81	121284738	Pole		Lakehead
82	121321106	Pole		Lakehead
83	121284727	Pole	18101 Pine Street	Lakehead
84	121284726	Pole	Pine Street	Lakehead
85	121284713	Pole	20682 Mammoth	Lakehead
86	121284714	Pole	Mammoth	Lakehead
87	121284715	Pole	20710 Mammoth	Lakehead
88	145	Pole		Lakehead
89		Pole	Lat: 40.7998439, Long: - 122.3311879	Lakehead
90	38	Pole	O'Brien Mountain Estate	Lakehead
91	36	Pole	O'Brien Mountain Estate	Lakehead
92	121285202	Pole	O'Brien Mountain Estate	Lakehead
93	121285203	Pole	O'Brien Mountain Estate	Lakehead
94	121285201	Pole	O'Brien Mountain Estate	Lakehead
95	121304593	Pole	O'Brien Mountain Estate	Lakehead
96		Service Drop	Lower Salt Creek Resort and RV	Lakehead
97	120858383	Pole	Lower Salt Creek Rd	Lakehead
98	121117782	Pole	Lower Salt Creek Rd	Lakehead
99	12	Pole	Salt Creek Resort and RV	Lakehead
100	11	Pole	Salt Creek Resort and RV	Lakehead
101		Pole	19088 and 19096 Lower Salt Creek Road	Lakehead
102	121117781	Pole	Lower Salt Creek Road	Lakehead
103	121117785	Pole	Lower Salt Creek Road	Lakehead
104		Pole	13 Lower Salt Creek Road	Lakehead
105	121117798	Pole	Lower Salt Creek Road	Lakehead

IV. Field Inspection Violations

ESRB observed the following violations during the field inspection:

1. 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.”

Vegetation is causing a strain/abrasion on AT&T’s line at 21980 S. Wallen Road in Red Bluff (Location 51). AT&T had a preexisting work package.

2. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1 Case 4 Column B states in part:

“The basic minimum allowable vertical clearance of a communication conductor and supply service drop in an above ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment is 15 feet.”

The clearance from the ground for an AT&T service line on a private road is less than 15 feet at O’Brien Mountain Estate in Lakehead (Location 93).

3. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2 requires that:

Case No. 3, Column C: The clearance between communication conductors must be at least 24 inches.

Case No. 3, Column F: The clearance between communication conductors and power supply conductors with voltage of 7,500-20,000 V, must be at least 72 inches.

Case No. 3, Column G: The clearance between communication conductors and power supply conductors with voltage of 20,000-35,000 V, must be at least 96 inches.

Case 8 Column C: 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.”

- 3.1. An AT&T service line has less than 72 inches of clearance from a PG&E service line at 16307 Lower Springs Road in Redding (Location 2).
- 3.2. An AT&T service line has less than 72 inches of clearance from a PG&E service line at 16327 Lower Springs Road in Redding (Location 3).
- 3.3. An AT&T service drop is less than 12 inches from a PG&E service drop at 1340 Ridge Drive in Redding (Location 12).
- 3.4. The clearance between the AT&T and Spectrum cables at Cedar Drive in Lakehead (Location 76) is less than 24 inches.

4. 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.”

- 4.1. The AT&T terminal box is contacting the AT&T cable causing a strain at Pole ID location 121308783 in Cottonwood (Location 34).
- 4.2. An AT&T cable between 18275 & 18230 Vista Lane in Cottonwood (Location 40) is down and contacting vegetation.
- 4.3. The lashing wire at pole ID 121182154 at Vista Lane in Cottonwood (Location 44) is broken. AT&T has a preexisting work package # 100435715.
- 4.4. There are dangling and unsecured AT&T cables at 18285 Vista Lane in Cottonwood (Location 45).
- 4.5. The splice at 21963 S. Wallen Road in Red Bluff (Location 48) needs to be reattached to the pole and covered.
- 4.6. The service drop at pole ID 110304529 at S. Wallen Road in Red Bluff (Location 54) is not properly secured.
- 4.7. There is a buddy pole at 15920 Red Bank Road in Red bluff (Location 61) because AT&T has yet to move its facilities onto the new pole.
- 4.8. There is a buddy pole at pole ID 25-461-T40590331 in Los Molinos (Location 62) because AT&T has yet to move its facilities onto the new pole. AT&T has a preexisting work package # 418111.
- 4.9. There is a buddy pole at pole ID 25-462-T40601059 in Los Molinos (Location 67) because AT&T has yet to move its facilities onto the new pole.
- 4.10. The AT&T pole at Lat: 40.0502640 Long: -122.0911204 in Los Molinos (Location 69) is split at the top and AT&T’s attachment’s grip is compromised.
- 4.11. There is a buddy pole at 26205 Skeet Street in Los Molinos (Location 71) because AT&T has yet to move its facilities onto the new pole. AT&T has a preexisting work package.
- 4.12. There is a dangling AT&T service drop at the Lower Salt Creek Resort and RV in Lakehead (Location 96). AT&T has a preexisting work package 100450625.
- 4.13. There is a downed AT&T cable behind 13 Lower Salt Creek Road in Lakehead (Location 104).

5. 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.”

- 5.1. There is an abandoned AT&T cable and equipment by the pole at HWY 299/ 16177 Middle Creek in Redding (Location 1).
- 5.2. An idle AT&T cable was left wrapped around the pole between 1534 and 1550 Ridge Drive in Redding (Location 22).
- 5.3. There is an abandoned AT&T service drop at 15950 Red Bank Road in Red Bluff (Location 57).
- 5.4. There is an abandoned loose AT&T grounding cable at 20655 Cedar Drive in Lakehead (Location 74).
- 5.5. There is an abandoned AT&T cable at 20694 Cedar Drive in Lakehead (Location 78).
- 5.6. There is an abandoned loose AT&T service drop at 20682 Mammoth Street in Lakehead (Location 85).
- 5.7. AT&T has an abandoned cable at 20710 Mammoth in Lakehead (Location 87).
- 5.8. There is an abandoned AT&T cable at Lower Salt Creek Road in Lakehead (Location 103).

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 guy wire on the pole at HWY 299/ 16177 Middle Creek in Redding (Location 1) is slacked. There was a pre-existing notification.
- 6.2. The guy wire on the pole at 19733 Gas point in Cottonwood (Location 33) is slacked.
- 6.3. All the guy wires on the pole ID 145 in Lakewood (Location 88) are slacked.
- 6.4. The guy wire on the pole ID 36 at O’Brien Mountain Estate in Lakewood (Location 91) is slacked.
- 6.5. The guy wire on the pole ID 121117781 at Lower Salt Creek Road in Lakewood (Location 102) is slacked.
- 6.6. The guy wire on the pole ID 121117798 at Lower Salt Creek Road in Lakewood (Location 105) is slacked.

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

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

- 7.1. AT&T's span guy wire is contacting an AT&T service line at Pole ID locations G6 & 110523076 in Andersen (Location 27).
- 7.2. AT&T's guy wire is less than the allowable radial separation of 3 inches from the AT&T service line at Pole ID 121284738 in Lakehead (Location 81).
- 7.3. The AT&T cable is contacting PG&E's guy wire at Lower Salt Creek Road in Lakehead (Location 103).

8. 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."

- 8.1. The pole step for the pole at 1480 Ridge Drive in Redding (Location 20) is low.
- 8.2. The pole step for the pole between 1534 and 1550 Ridge Drive in Redding (Location 22) is low.

9. GO 95, Rule 86.9, Guy Marker (Guy Guard) states:

"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."

- 9.1. The guy on the pole located at 8736 Shasta Blvd. in Los Molinos (Location 64) is missing a guy marker.
- 9.2. The guy on pole ID 12 located at Salt Creek Resort and RV in Lakehead (Location 99) is missing a guy marker. AT&T had a preexisting notification

V. Observations

1. ESRB 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.”

- 2.1. The PG&E guy wire on the pole with Pole ID 121204214 in Cottonwood (Location 36) is slacked. AT&T created a TPN work package #100587881.
- 2.2. The PG&E guy wire on the pole at Pole ID location 121308783 in Cottonwood (Location 34) is slacked. AT&T created a TPN work package #100587874.
- 2.3. There is an abandoned Spectrum cable which is also contacting an AT&T service line at 1522 Ridge Drive in Redding. AT&T created a TPN work package #100587720.
- 2.4. A Spectrum cable is contacting an AT&T line at 1410 Ridge Drive in Redding (Location 26). AT&T created a TPN work package #100587711.
- 2.5. A Spectrum cable service drop is less than 12 inches from a power service drop at 1429 Ridge Drive in Redding (Location 18). AT&T created a TPN work package #100587715.
- 2.6. The equipment identification label on the AT&T pedestal by Pole ID # 121308784 in Cottonwood (Location 35) is illegible.
- 2.7. The PG&E pole and the AT&T pedestal by this pole located at Lat: 40.3889638, Long: -122.3244022 in Cottonwood (Location 37) are missing a Pole ID and an equipment identification label.
- 2.8. The guy anchor at PG&E Pole ID 110304530 located at 21917 S. Wallen Road in Red Bluff (Location 50) is buried. AT&T created a TPN work package #100588107.
- 2.9. The anchor at PG&E Pole ID 110304529 at S. Wallen Road in Red Bluff (Location 54) is buried. AT&T a created TPN work package #100588119.
- 2.10. The PG&E secondary pole at 15945 Red Bank Road in Red Bluff (Location 56) has dangling cables and foreign attachments on the pole. AT&T created a TPN work package #100588203.
- 2.11. There is an abandoned Spectrum service drop at 8750 Shasta Blvd in Molinos (Location 63).
- 2.12. The PG&E pole at Lat: 40.0487533 Long: -122.0921645 in Los Molinos (Location 68) has the following issues: faded guy marker, a damaged molding ground cover, and the pole is showing signs of deterioration. AT&T created a TPN work package #100588367.
- 2.13. The Spectrum guy wire on the pole at Lat: 40.0487533 Long: -122.0921645 in Los Molinos (Location 68) is slacked. AT&T created a TPN work package #100588369.

- 2.14. There is an unsecured Spectrum service drop at 26205 Skeet Street in Molinos (Location 71). AT&T created a TPN work package #100588384.
- 2.15. The following issues were observed for Spectrum at 8240 Sherwood Blvd. in Molinos (Location 72): unsecured cable, dangling cable, and vegetation strain.
- 2.16. There is an unsecured Spectrum cable at 8265 Sherwood Blvd. in Los Molinos (Location 73). AT&T created a TPN work package #100588391.
- 2.17. There is an unsecured Spectrum cable at 20655 Cedar Drive in Lakehead (Location 74). AT&T created a TPN work package #100588504.
- 2.18. A Spectrum service drop at 20659 Cedar Drive in Lakehead (Location 75) is bridging the clearance space between it and AT&T's service drop. The lashing wire is also broken. AT&T created a TPN work package #100588512 for the service drop and 100588513 for the broken lashing wire.
- 2.19. There is an unsecured Spectrum cable at Pole ID 121284714 in Lakehead (Location 74).
- 2.20. A Spectrum cable at 20710 Mammoth in Lakehead (Location 87) is bridging the clearance space between it and AT&T's cable.
- 2.21. Vegetation is in close contact with the guy bulb for a PG&E with Pole ID 121285202 at O'Brien Mountain Estate in Lakehead (Location 92). AT&T created a TPN work package #100588598.
- 2.22. The guy anchor at PG&E Pole ID 121285203 located at O'Brien Mountain Estate in Lakehead (Location 93) is buried. AT&T created a TPN work package #1005885610.
- 2.23. A PG&E guy wire is contacting the AT&T cable at PG&E Pole ID 121117781 located at Lower Salt Creek Road in Lakehead (Location 102).