

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 23, 2023

CA2023-1031

Ross Johnson
AT&T Director of Regulatory Relations
430 Bush Street, 5th Floor
San Francisco, CA 94108

SUBJECT: Audit of AT&T's South Region-Riverside and West San Bernardino County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Mily Vaidya of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's South Region-Riverside and West San Bernardino County District from April 17, 2023- April 21, 2023. The audit included a review of AT&T's inspection and maintenance records and a field inspection of AT&T communication 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 June 26, 2023, by electronic or hard copy, of all corrective measures taken by AT&T 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 order.
- Pole loading calculations
- AT&T's Overhead Lines Maintenance Plan
- AT&T'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 ID.	Type of Structure	Location
1	01	Pole	Riverside
2	119667E	Pole	Riverside
3	4817575E	Pole	Riverside
4	4420929E	Pole	Riverside
5	4672777E	Pole	Riverside
6	4672778E	Pole	Riverside
7	J39277	Pole	Riverside
8	4672779E	Pole	Riverside
9	4845486E	Pole	Riverside
10	J36122	Pole	Riverside
11	10084J	Pole	Riverside
12	Next to pole 4625	Pole	Riverside
13	4625	Padmount	Riverside
14	J38353	Pole	Riverside
15	41557J	Pole	Riverside
16	Unknown	Pole	Next to Monroe St. & Conway Dr/Riverside
17	J38339	Pole	Riverside
18	16234J	Pole	Riverside
19	J37240	Pole	Riverside
20	3871J	Pole	Riverside
21	24397J	Pole	Riverside
22	3837J	Pole	Riverside
23	3876J	Pole	Riverside
24	32251J	Pole	Riverside
25	32252J	Pole	Riverside
26	4741	Pedestal	Riverside
27	9650	Pedestal	Riverside
28	9620	Pedestal	Riverside
29	9470	Pedestal	Riverside
30	9415	Pedestal	Riverside
31	9095	Pedestal	Riverside
32	6776	Pedestal	Riverside
33	6860	Pedestal	Riverside
34	6894	Pedestal	Riverside
35	9040	Pedestal	Riverside
36	9050	Pedestal	Riverside
37	9080	Pedestal	Riverside
38	9690	Pedestal	Riverside
39	6715	Pedestal	Riverside

40	6735	Pedestal	Riverside
41	4885920E	Pole	Fontana
42	4720974E	Pole	Fontana
43	4757445E	Pole	Fontana
44	4912703E	Pole	Fontana
45	4435626E	Pole	Fontana
46	4131755E	Pole	Fontana
47	Unknown	Pole	Buckeye Dr & Merrill Ave/ Fontana
48	4120632E	Pole	Fontana
49	4887363E	Pole	Fontana
50	4804254E	Pole	Fontana
51	18088	Padmount	Fontana
52	4923490E	Pole	Fontana
53	Unknown	Pole	Merrill Ave & Locust Ave/ Fontana
54	2332897E	Pole	Fontana
55	261325	Pole	Fontana
56	261326S	Pole	Fontana
57	261327S	Pole	Fontana
58	261328S	Pole	Fontana
59	8850	Pedestal	Fontana
60	8820	Pedestal	Fontana
61	320252E	Pole	Fontana
62	40437J	Pole	Fontana
63	2933	Pole	Fontana
64	Terminal # 2910	Pole	Fontana
65	11272	Pole	Fontana
66	779780	Pole	Fontana
67	685059H	Pole	Fontana
68	12007J	Pole	Fontana
69	3491	Pole	Fontana
70	2957	Pole	Fontana
71	11256J	Pole	Fontana
72	1939997E	Pole	Corona
73	2084508E	Pole	Corona
74	2215342E	Pole	Corona
75	779794H	Pole	Corona
76	2084496E	Pole	Corona
77	435537H	Pole	Corona
78	2084495E	Pole	Corona
79	4779685E	Pole	Corona
80	2084493E	Pole	Corona
81	790	Pedestal	Mandeville Way
82	820	Pedestal	Mandeville Way
83	735	Pedestal	Mandeville Way
84	745	Pedestal	Mandeville Way

85	765	Pedestal	Mandeville Way
86	795	Pedestal	Mandeville Way
87	F825	Pedestal	Mandeville Way
88	F845	Pedestal	Mandeville Way
89	F875	Pedestal	Mandeville Way
90	F915	Pedestal	Mandeville Way
91	4020918E	Pole	Norco
92	277481E	Pole	Norco
93	1065048E	Pole	Norco
94	4341349E	Pole	Norco
95	4068151E	Pole	Norco
96	4283005E	Pole	Norco
97	4300830E	Pole	Norco
98	290516E	Pole	Norco
99	706623H	Pole	Norco
100	706624H	Pole	Norco
101	4510619E	Pole	Norco
102	4172738E	Pole	Norco
103	809907H	Pole	Norco
104	3911	Pedestal	Valley View & 6 th Street, Norco

III. Field Inspection – Violations List

My observed the following violations during the field inspections:

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.

AT&T's facilities on the following poles required maintenance:

- Pole 119667E: there was a damaged pole step.
- Pole 4420929E: the location where the down guy wire was attached to the guy anchor was buried.
- Pole 4845486E: the location where the down guy wire was attached to the guy anchor was buried.
- Pole 32252J: AT&T needs to complete the pole transfer.
- Pole 4757445E: there was a damaged lashing wire,
- Pole in front of Buckeye Dr and Merrill Ave: there was a damaged lashing wire.
- Pole 4923490E: AT&T needs to complete the pole transfer.
- Pole in front of Merrill and Locust Ave: there was a damaged lashing wire.
- Pole 2332897E: there was a damaged lashing wire.
- Pole 11272: there was a damaged lashing wire.
- Pole 3491: AT&T needs to complete the pole transfer.
- Pole 2957: AT&T needs to complete the pole transfer.
- Pole 435537H: there was a damaged lashing wire.
- Pole 2084493E: there was a broken down guy wire.
- Pole 706624H: there was a damaged lashing wire.
- Pole 4510619E: there was a damaged pole step.
- Pole 809907H: there was a damaged terminal box, and damaged lashing wire.

GO 95, Rule 86.2: 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.

The down guy wire attached to Pole number 809907H was “broken”.

GO 95, Rule 18-A2: Resolution of Potential Violations of General Order 95 and Safety Hazard states in part:

Where a communications company's or an electric utility's (Company A's) actions result in potential violations of GO 95 for another entity (Company B), that entity's (Company B's) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

AT&T conductors attached to each of the following poles were touching a third-party facilities:

- Pole 779780: a CATV service drop was touching an AT&T conductor.
- Pole 4300830E: a CATV service drop was wrapped around an AT&T communications conductor.
- Pole 261325: a CATV lashing wire was touching an AT&T communications conductor.

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.

The following poles have permanently abandoned AT&T's service drop that were not removed:

- 4845486E
- J36122
- J37246
- 24397J
- 4720974E
- 4020918E

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.

Pole 320252E had an unauthorized mailbox attached.

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.

The lowest pole step on pole 290516E was located at a height of less than eight feet.

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 ground moulding on each of the following poles was damaged:

- Pole 4672778E
- Pole 11256J
- Pole 2084496E

GO 95, Rule 38, Table 2, Case 8, Column C requires the vertical separation of communications conductors (including service drops) supported at different levels on the same pole to be 12 inches.

- Pole 1065048E: an AT&T communication conductor was touching a CATV conductor.
- Pole 40437: an AT&T service drop was touching a CATV conductor.

GO 128, Rule 32.7, Covers, states in part:

Manholes, handholes, and subsurface equipment enclosures while not being worked in, shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them and arrangements shall be such that a tool or appliance shall be required for their opening and cover removal.

The following AT&T facilities had covers that were not secured:

- Pedestal 18088: cover was not secured (it had a missing bolt).
- Pedestal F875: cover was broken.