

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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December 18, 2023

CA2023-1159

Rex Knowles, Director – Government Affairs
Verizon
9656 Prosperity Road, West Jordan, Utah 84088

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Verizon Morgan Hill/Gilroy Region

Mr. Knowles:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio of ESRB staff conducted an CIP audit of Verizon Morgan Hill/Gilroy region on November 13, 2023. During the audit, ESRB staff conducted field inspections of Verizon's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than February 2, 2024, by electronic copy of all corrective actions and preventive measures taken by Verizon to correct the identified violations and prevent the recurrence of such violations. Please note that ESRB will be posting the audit report and your response to the audit on the CPUC website. If there is any information in your response that you want us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

Rickey Tse, 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 Verizon Morgan Hill/Gilroy Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Jane Whang, State Government Affairs & Regulatory, Verizon

**CPUC AUDIT FINDINGS OF VERIZON
MORGAN HILL - GILROY REGION**

I. Records Review

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

- Verizon’s Pole Inspection Program
- Verizon’s Inspection Training Program
- Verizon Wireless Facility Statistics of Morgan Hill – Gilroy Region
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the Last 5 Years
- Work Orders in the Last 5 Years
- Pole Loading Calculations Conducted in the Last 5 Years
- Safety Hazard Notifications Verizon Received and Sent to Third Parties in the Last 5 Years

II. Field Inspection

During the field inspection on November 13, 2023, ESRB staff inspected Verizon’s wireless communication facilities in the locations listed in Table 1.

Table 1: Field Inspection Locations

Location #	Address/GPS Location	Structure Type	Structure #
1	[REDACTED]	Pole	GR 02
2	[REDACTED]	Pole	GR 10
3	[REDACTED]	Pole	GR 13
4	[REDACTED]	Pole	GR 05
5	[REDACTED]	Pole	GR 01
6	[REDACTED]	Pole	GR 07
7	[REDACTED]	Pole	GR 08

Location #	Address/GPS Location	Structure Type	Structure #
8	[REDACTED]	Pole	Murray SC 1
9	[REDACTED]	UG Splice Box	Manhole 979283
10	[REDACTED]	UG Splice Box	Manhole 979281
11	[REDACTED]	Pole	Dunne Ave. SC 5
12	[REDACTED]	Pole	Dunne Ave. SC 3
13	[REDACTED]	Pole	Depaul Dr. SC 1

III. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. GO 95, Rule 94.3A, General Requirements states:

“Antennas shall meet the requirements of Class C equipment, unless otherwise specified in this rule.”

GO 95, Rule 92.4C(2c), Ground Rods states in part:

“Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground.”

ESRB’s finding is listed in Table 2:

Table 2: GO 95, Rule 94.3A and 92.4C(2c) Finding

Location #	Finding
1	Ground rod is exposed.

2. GO 95, Rule 94.5A, Marking states:

“Joint use poles shall be marked with a sign for each antenna installation as follows:

- (1) Identification of the antenna operator*
- (2) A 24-hour contact number of antenna operator for Emergency or Information*
- (3) Unique identifier of the antenna installation.”*

ESRB’s findings are listed in Table 3:

Table 3: GO 95, Rule 94.5A Findings

Location #	Findings
11	Dunne Ave. SC 5 has no identification of the antenna operator and no unique identifier of the antenna installation.
12	Dunne Ave. SC 3 has no identification of the antenna operator and no unique identifier of the antenna installation.

3. GO 95, Rule 94.3A, General Requirements states:

“Antennas shall meet the requirements of Class C equipment, unless otherwise specified in this rule.”

GO 95, Rule 89.3, Telephone Instruments on Poles or Structures states:

“Where a telephone instrument is attached to the surface of a pole or structure at less than 8 feet vertically above the ground (or at any elevation on a grounded metal pole or structure) and is connected to a private communication circuit constructed on the same pole line with, or colinear with, a Class H supply circuit, or is connected to a private communication circuit carried on crossarms with supply conductors of 750 – 22,500 volts, such instrument shall be enclosed in a suitable box of wood or equivalent insulating material, which shall be locked to prevent access by unauthorized persons. Where such a telephone instrument is so attached, connected, and enclosed, unless isolated from the communication circuit by an adequate insulating transformer, a suitably insulated stool or platform, on which a person can stand while using the instrument, shall be provided.”

ESRB’s findings are listed in **Error! Reference source not found.**:

Table 4: GO 95, Rule 94.3A and 89.3 Findings

Location #	Findings
4	GR 05 was missing a lock on disconnect box.
6	GR 07 was missing a lock on disconnect box.

4. 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.”

ESRB’s finding is listed in Table 5:

Table 5: GO 95, Rule 31.6 Finding

Location #	Finding
4	There is an abandoned and unattached communication line at GR 05.

5. 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.”

ESRB’s findings are listed in Table 6:

Table 6: GO 95, Rule 17.1 Findings

Location #	Findings
2	Underground Equipment box was missing a lock. Cover was removable.
5	Panel is found open for generator plug.

6. 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.”

ESRB’s findings are listed in Table 7:

Table 7: GO 128, Rule 17.8 Findings

Location #	Findings
2	No mark of ownership on ground mounted equipment serving GR 10.
5	No mark of ownership on underground equipment serving GR 01.