

CONFIDENTIAL ATTACHMENT 1

RECORDS FINDINGS

1. Mediacom lacks formal written procedures that describe the methodology used to ensure that all its Communication Lines are subject to the required inspections. ESRB acknowledges that Mediacom performs patrols and detailed inspections during its normal course of business; however, Mediacom must develop written procedures to ensure its patrols and inspections cover all communication lines subject to GO 95, Rule 80.1.

MEDIACOM'S RESPONSE:

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

2. Mediacom's current procedures that are used to specify the problems that should be identified by inspections do not reference proper construction requirements in GO 95. For example, Mediacom's current Electrical Safety Procedure mainly references the National Electrical Safety Code (NESC). In many cases, values in the NESC are less strict than the requirements in GO 95. For example, the NESC allows the vertical clearance of communication cables in areas exposed to truck traffic to be 15.5 feet from the ground surface, while GO 95, Table 1, Case 3.C requires minimum vertical clearances of 18 feet from the ground surface for cables crossing throughfares. Mediacom must update its procedures to reference GO 95 and GO 128 clearance and separation requirements.

MEDIACOM'S RESPONSE:

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

3. Patrol inspections, defined in Rule 80.1.A([2]), require a checklist that specifies problems that inspectors should identify. Mediacom did not provide evidence that it uses a checklist for patrol inspections. ESRB acknowledges that Mediacom has a comprehensive checklist for its detailed inspections; however, Mediacom must also develop a checklist for its patrol inspections that inspectors can use to identify obvious structural problems and hazards.

MEDIACOM'S RESPONSE:

[BEGIN CONFIDENTIAL] [REDACTED]
[REDACTED] **[END CONFIDENTIAL]**

4. Mediacom indicated that it only began maintaining records of its detailed inspection starting in 2022. The requirements in GO 95, Rule 80.1.A.(4) have been effective since January 12, 2012, by Decision No. 12-01-032.

Additionally, Mediacom supplied ESRB with Patrol Inspections and a patrol Rideout Map. The Patrol Inspection captures only those facilities that failed inspection and required corrective action. For those facilities that did not have any nonconformances identified during the Patrol Inspections, Mediacom did not record the locations, dates, inspectors, and the results of the Patrol Inspection. Similarly, the Rideout Map is a map of all facilities patrolled between November 15, 2023 and February 29, 2024. The map does not provide each individual facilities' Patrol Inspection results. GO 95, Rule 80.1.A.(4) requires the location, dates, results, etc. for each facility, whether passing or failing, to be recorded and retained for at least 10 years. [footnotes omitted]

MEDIACOM'S RESPONSE:

[BEGIN CONFIDENTIAL] [REDACTED]
[REDACTED]
[REDACTED] **[END CONFIDENTIAL]**