PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

April 26, 2024 CA2024-1177

James McKnight
Senior Director – Legal Affairs
Mediacom
1 Mediacom Way
Mediacom Park, NY 10918

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Mediacom's Lake County Service Area

Mr. McKnight:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Stephen Lee and Joseph Murphy of ESRB staff conducted an CIP audit of Mediacom's Lake County Service Area from February 26, 2024 through March 1, 2024. During the audit, ESRB staff conducted field inspections of Mediacom's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations is enclosed.

Please provide a response no later than May 28, 2024, via electronic copy of all corrective actions and preventive measures taken by Mediacom to correct the identified violations and prevent the recurrence of such violations and observations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like 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 Stephen Lee at (916) 661-2353 or Stephen.Lee@cpuc.ca.gov.

Sincerely,

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC Audit Findings of Mediacom Lake County Service Area

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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CPUC AUDIT FINDINGS OF

MEDIACOM LAKE COUNTY SERVICE AREA

FEBRUARY 26 – MARCH 1, 2024

I. Records Review

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

- A description of Mediacom's Overhead and Underground maintenance program.
- Mediacom's inspector training program guide for its Broadband Specialists.
- Mediacom's Lake County Facility Statistics as of January 2024, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Mediacom's Lake County Facility Maps as of January 2024.
- Mediacom's Lake County Service Area Patrol Data containing data for the patrolled facility type, facility location, fire threat district location, patrol date, and resulting patrol findings from January 2019 through January 2024.
- Mediacom's Lake County Service Area Detailed Inspection Data containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings from January 2023 through January 2024.
- Safety Hazards Notifications Mediacom Received from Third Party Utilities from January 2019 through January 2024.
- Safety Hazard Notifications Mediacom Sent to Third Party Utilities from January 2019 through January 2024.
- Mediacom's Lake County Service Area Pole Loading Analysis Projects List from January 2023 through January 2024.
- Mediacom's Lake County Service Area intrusive pole tests from January 2023 through January 2024.
- Mediacom's Lake County Service Area new construction projects from January 2019 through January 2024.

II. Records Violations

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

1. **GO 95, Rule 80.1.A.(1) 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 for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table.*
>
> | *Inspection* | *Tier 2* | *Tier 3* |
> |---|---|---|
> | *Patrol* | *2 Years* | *1 Year* |
> | *Detailed* | *10 Years* | *5 Years* |
>
> *Inspections in the High Fire-Threat District shall be planned and conducted in accordance with the statewide inspection requirements and procedures described in Rule 80.1-A(2), below.*
>
> *Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections."*

Additionally, **GO 95, Rule 80.1.A.(2) Statewide Inspection Requirements** states:

> *"Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following factors:*
>
> - *Fire threat*
> - *Proximity to overhead power line facilities*
> - *Terrain*
> - *Accessibility*
> - *Location, including whether the Communications Lines are located in the High Fire-Threat District*
>
> *Each company that discovers a safety hazard on or near a communications facility or electric facility involving another company while performing inspections of its own facilities pursuant to this rule shall notify the other*

company and/or facility owner of such safety hazard in accordance with Rule 18-A3.

Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections."

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.

2. **GO 95, Rule 80.1.A.(1) Inspection Requirements for Joint-Use Poles in High Fire-Threat District** and **GO 95, Rule 80.1.A.(2) Statewide Inspection Requirements** both state in part:

   "Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections."

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.

3. **GO 95, Rule 80.1.A.(1) Inspection Requirements for Joint-Use Poles in High Fire-Threat District** and **GO 95, Rule 80.1.A.(2) Statewide Inspection Requirements** both state in part:

   "Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections."

GO 95, Rule 80.1.A.(3) Definitions, Patrol Inspections states:

> *"For the purpose of this rule, Patrol Inspection shall be defined as a simple visual inspection, of applicable communications facilities equipment and structures that is designed to identify obvious structural problems and hazards. Patrol inspections may be carried out in the course of other company business."*

Patrol inspections, defined in Rule 80.1.A.(3), 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.

4. **GO 95, Rule 80.1.A.(4) Record Keeping** states:

> *"Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a)."*

Mediacom indicated that it only began maintaining records of its detailed inspection starting in 2022.[1] 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[2] and a patrol Rideout Map.[3] 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.

[1] Mediacom pre-audit response Confidential Exhibit DR 6B - Detailed Inspections. These inspection records date from January 17, 2023.
[2] Mediacom pre-audit response Confidential Exhibit DR 6A - Patrol Inspections.
[3] Mediacom post-audit response Confidential Exhibit - Post Audit DR 10 - Route Map.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure Type	Approximate Latitude / Longitude	Approximate Address	City
1	Pole	39.025857, -122.662987	13211 1st St	Clear Lake Oaks
2	Pole	39.026026, -122.663444	13181 1st St	Clear Lake Oaks
3	Pole	39.0262892, -122.6640259	13133 1st St	Clear Lake Oaks
4	Pole	39.0258183, -122.6626150	65 Hoover St	Clear Lake Oaks
5	Pedestal	39.0241411, -122.6593464	13426 Marina Village	Clear Lake Oaks
6	Pedestal	39.0242221, -122.6595399	13389 Marina Village	Clear Lake Oaks
7	Pedestal	39.024102, -122.659019	13438 Marina Village	Clear Lake Oaks
8	Pole	39.023988, -122.665250	13061 5th St	Clear Lake Oaks
9	Pole	39.0241109, -122.6657807	Intersection of Butler St and 5th St	Clear Lake Oaks
10	Pole	39.023713, -122.664646	13050 5th St	Clear Lake Oaks
11	Pole	39.0806110, -122.7873481	6660 Berwick Rd – A	Lucerne
12	Pole	39.0803518, -122.7873321	6660 Berwick Rd – B	Lucerne
13	Pole	39.0941134, -122.7922841	4160 Foothill Dr	Lucerne
14	Pole	39.0934438, -122.7923877	Intersection of Foothill Dr and Hillclimb Pl	Lucerne
15	Pole	39.0934350, -122.7924671	Across from the intersection of Foothill Dr and Hillclimb Pl	Lucerne
16	Pole	39.0967750, -122.7942159	6200 Robinhood Way	Lucerne
17	Pole	39.122068, -122.839855	6891 Hudson Ave	Nice
18	Pole	39.122314, -122.839738	Intersection of Hudson Ave and Manzanita Dr	Nice
19	Pole	39.1246475, -122.8478139	3365 Beynon St	Nice
20	Pole	39.1244145, -122.8481089	3355 Beynon St	Nice
21	Pole	39.1242342, -122.8484110	Rear of 6713 Sayre Ave - Pole on Beynon St	Nice
22	Pole	39.1256182, -122.8535759	6885 Floyd Way	Nice
23	Pole	39.1252135, -122.8540694	6855 Floyd Way	Nice

Location #	Structure Type	Approximate Latitude / Longitude	Approximate Address	City
24	Pole	39.1248600, -122.8546213	6845 Floyd Way	Nice
25	Pole	39.124258, -122.855396	6805 Floyd Way	Nice
26	Pole	39.1239986, -122.8557478	6775 Floyd Way	Nice
27	Pole	39.1623432, -122.9048111	9350-6 Government St	Upper Lake
28	Pole	39.162552, -122.904709	9350-8 Government St	Upper Lake
29	Pole	39.162760, -122.904657	9350-9 Government St	Upper Lake
30	Pole	39.1619135, -122.9049218	Intersection of Government St and Hwy 20	Upper Lake
31	Pole	39.156890, -122.914011	8969 Bridge Arbor N	Upper Lake
32	Pole	39.156829, -122.913599	8924 Bridge Arbor N	Upper Lake
33	Pedestal	39.091336, -122.908171	4178 6th St	North Lakeport
34	Pedestal	39.0916801, -122.9083547	460 Walnut Dr	North Lakeport
35	Pedestal	39.091649, -122.907855	400 Walnut Dr	North Lakeport
36	Pedestal	39.0567212, -122.9268800	1058 Adams St	Lakeport
37	Pedestal	39.0568777, -122.9262259	1024 Adams St	Lakeport
38	Pedestal	39.055320, -122.921978	816 19th St	Lakeport
39	Vault	39.055320, -122.921978	816 19th St	Lakeport
40	Pole	39.004371, -122.874800	2030 Finley East Rd	Finley
41	Pole	39.004296, -122.874587	2031 Finley East Rd	Finley
42	Pole	39.0043687, -122.8738511	2032 Finley East Rd	Finley
43	Pole	39.0043549, -122.8734916	2033 Finley East Rd	Finley
44	Pole	39.0042637, -122.8735191	2034 Finley East Rd	Finley
45	Pole	39.004350, -122.872951	2035 Finley East Rd	Finley
46	Pole	38.9948127, -122.8658477	2582 Big Valley Rd	Finley
47	Pole	38.995167, -122.866140	2555 Big Valley Rd	Finley
48	Pole	38.9956760, -122.8661568	2489 Big Valley Rd	Finley
49	Pole	38.9960574, -122.8661565	2485 Big Valley Rd	Finley
50	Pole	39.0137781, -122.8383440	3790 Soda Rd – A	Kelseyville
51	Pole	39.0144822, -122.8383353	3790 Soda Rd – B	Kelseyville
52	Pole	39.0150999, -122.8383379	3790 Soda Rd – C	Kelseyville
53	Pole	39.0069374, -122.8290357	3270 Gaddy Ln	Kelseyville
54	Pole	39.0065635, -122.8290518	3340 Gaddy Ln – A	Kelseyville
55	Pole	39.005752, -122.829043	3340 Gaddy Ln – B	Kelseyville
56	Pole	38.980484, -122.827153	5152 Piner Ave	Kelseyville
57	Pole	38.9808986, -122.8271662	5094 Piner Ave	Kelseyville
58	Pole	38.9799379, -122.8271997	5180 Piner Ave	Kelseyville
59	Pole	38.9794116, -122.8271672	4680 Sylar Ln	Kelseyville
60	Pole	38.8467473, -122.7294372	9711 Fox Dr (rear of Emerford Rd)	Cobb

Location #	Structure Type	Approximate Latitude / Longitude	Approximate Address	City
61	Pole	38.8467627, -122.7287368	Intersection of Fox Dr and Emerford Dr – A	Cobb
62	Pole	38.8467619, -122.7286058	Intersection of Fox Dr and Emerford Dr – B	Cobb
63	Pole	38.8468773, -122.7285504	Intersection of Fox Dr and Emerford Dr – C	Cobb
64	Pole	38.8472207, -122.7291288	9711 Fox Dr	Cobb
65	Pole	38.8452051, -122.7304471	14874 Emerford Dr	Cobb
66	Pole	38.818195, -122.708887	16721 Cobb Blvd	Cobb
67	Pole	38.8182297, -122.7094313	16716 Cobb Blvd	Cobb
68	Pole	38.8181458, -122.7097515	16701 Cobb Blvd	Cobb
69	Pole	38.818164, -122.710217	16697 Cobb Blvd	Cobb
70	Pole	38.818494, -122.710413	16689 Cobb Blvd	Cobb
71	Pole	38.818795, -122.710381	Intersection of Cobb Blvd and Mountain View Dr	Cobb
72	Pole	39.0049883, -122.7607611	2675 Westlake Dr – A	Buckingham Park
73	Pole	39.0050490, -122.7608271	2675 Westlake Dr – B	Buckingham Park
74	Pole	39.0052311, -122.7605572	2655 Westlake Dr	Buckingham Park
75	Pole	39.0054536, -122.7599648	2660 Westlake Dr	Buckingham Park
76	Pole	39.0058301, -122.7592399	2605 Westlake Dr	Buckingham Park
77	Pole	39.0100697, -122.7527825	Intersection of Eastlake Dr and Orchard Dr	Buckingham Park
78	Pole	39.0100413, -122.7525921	Intersection of Eastlake Dr and Orchard Dr	Buckingham Park
79	Pole	39.0097826, -122.7527272	2290 Eastlake Dr	Buckingham Park
80	Pole	39.0095364, -122.7527188	2315 Eastlake Dr	Buckingham Park
81	Pole	39.0094374, -122.7525864	2310 Eastlake Dr	Buckingham Park
82	Pole	39.0089450, -122.7527738	2335 Eastlake Dr	Buckingham Park
83	Pole	39.0091169, -122.7525871	2330 Eastlake Dr	Buckingham Park
84	Pole	39.0086225, -122.7527272	2375 Eastlake Dr – A	Buckingham Park

Location #	Structure Type	Approximate Latitude / Longitude	Approximate Address	City
85	Pole	39.0086045, -122.7526152	2375 Eastlake Dr – B	Buckingham Park
86	Pole	39.0083533, -122.7527507	2395 Eastlake Dr	Buckingham Park
87	Pole	38.9516570, -122.7403656	5649 Yuki Ct	Kelseyville
88	Pole	38.9519404, -122.7401040	5641 Yuki Ct	Kelseyville
89	Pole	38.9516166, -122.7393081	5664 Ponca Way	Kelseyville
90	Pole	38.9514643, -122.7385755	5681 Ponca Way	Kelseyville
91	Pole	38.9554811, -122.7078079	Intersection of Terrance Way and Point Lakeview Rd	Kelseyville
92	Pole	38.9559343, -122.7074502	10790 Terrance Way	Kelseyville
93	Pole	38.9562177, -122.7072299	10810 Terrance Way	Kelseyville
94	Pole	38.9565084, -122.7070267	10830 Terrance Way	Kelseyville
95	Pole	38.874650, -122.608088	16373 Caballero Ct	Lower Lake
96	Pole	38.874230, -122.608194	16424 Caballero Ct	Lower Lake
97	Pole	38.875091, -122.607163	12367 Riata Rd	Lower Lake
98	Pole	38.8240715, -122.5684829	16402 Firethorne Rd	Hidden Valley
99	Pole	38.8236439, -122.5680521	16422 Firethorne Rd	Hidden Valley
100	Pole	38.8232795, -122.5689925	17783 Deer Hill Rd	Hidden Valley
101	Pole	38.8241089, -122.5691736	16402 Firethorne Rd	Hidden Valley
102	Pole	38.7529613, -122.6140945	Intersection of Young St and Washington St	Middletown
103	Pole	38.7525919, -122.6142766	21156 Washington St	Middletown
104	Pedestal	38.7451799, -122.6228174	15550 Central Park Rd – A	Middletown
105	Pedestal	38.7447043, -122.6220858	15550 Central Park Rd – B	Middletown
106	Pedestal	38.7452540, -122.6214518	15550 Central Park Rd – C	Middletown
107	Pole	38.964602, -122.631333	14944 Burns Valley Rd	Clearlake
108	Pole	38.964129, -122.631330	14946 Burns Valley Rd	Clearlake
109	Pole	38.9639755, -122.6313562	14948 Burns Valley Rd	Clearlake
110	Pole	38.9636181, -122.6313676	14954 Burns Valley Rd	Clearlake
111	Pole	38.963010, -122.631396	14920 Burns Valley Rd	Clearlake
112	Pole	38.964724, -122.631331	14940 Burns Valley Rd	Clearlake
113	Pole	38.9650443, -122.6313425	14936 Burns Valley Rd	Clearlake
114	Pole	38.9654241, -122.6313505	14932 Burns Valley Rd	Clearlake
115	Pole	38.965433, -122.630320	3256 Washington St	Clearlake

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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."*

ESRB's findings are listed in Table 1:

Table 1: GO 95, Rule 31.1 Findings

Location #	Findings
4	Mediacom needs to transfer its communication facilities to the new pole.
21	Mediacom's communication facilities were attached to the pole with rope. During the audit, Mediacom immediately corrected the issue and installed permanent hardware to securely attach its facilities to the pole.
23	The lashing wire is broken.
24	The lashing wire is broken.
25	The lashing wire is broken.
26	The lashing wire is broken.
51	The head of the down guy anchor is buried.
53	Mediacom has already transferred its facilities to the new pole and needs to remove the old buddy pole.
64	Mediacom needs to transfer its communication facilities to the new fiberglass pole.
65	Mediacom needs to transfer its communication facilities to the new pole. During this time, a new ground molding cover must be installed and clearance issues with AT&T's facilities must be resolved.
66	Mediacom's service drop is attached to the main cable span with rope. A permanent solution to secure the service drop is required.
68	Mediacom's cable span is not attached to the pole.
75	The lashing wire is broken.
77	There is mule tape/rope wrapped around Mediacom's facilities at the pole.
78	Mediacom needs to transfer its communication facilities to the new pole.

Location #	Findings
91	Mediacom needs to transfer its communication facilities to the new pole. During this time, Mediacom's clearance issues with AT&T's facilities must be resolved.
107	Mediacom's cable span is not attached to the pole.
108	The lashing wire is broken.
113	The lashing wire is loose. There is also a cut tree limb suspended in the cable span.
114	The lashing wire is broken.

2. 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 findings are listed in Table 2:

Table 2: GO 95, Rule 31.6 Findings

Location #	Findings
4	There is an abandoned service drop that served the home at 200 1st St.
25	There is an abandoned service drop hanging down at the pole.
26	There is a cut and abandoned cable span. The abandoned cable is contacting PG&E's down guy above the sectionalizing insulator.
27	There is an abandoned service drop hanging on the topmost pole step.
29	There is an abandoned service drop hanging at midspan.
30	There is an abandoned cable span.
45	An abandoned service drop is disconnected from the tap but is still attached to the pole and rests on top of AT&T's telephone span across the street.
57	There is an abandoned cable. The end of the abandoned cable is in proximity to AT&T's facilities.
96	There is an abandoned service drop that exits a pole-mounted enclosure near the bottom of the pole.
114	There is an abandoned service drop. Mediacom immediately removed the abandoned drop during the audit.

Location #	Findings
115	There is an abandoned cable span that is low and tied to a metal guardrail near a culvert. Mediacom immediately removed the abandoned cable span during the audit.

3. 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."

ESRB's findings are listed in Table 3:

Table 3: GO 95, Rule 35 Findings

Location #	Findings
25	A tree is causing strain on Mediacom's cable at the midspan.
42	The tree guard that was used to protect Mediacom's cable span against abrasion has shifted and is no longer protecting the span.
49	A tree is causing strain on Mediacom's cable at the midspan.
82	Vegetation is causing strain and abrasion on Mediacom's cable span.

4. GO 95, Rule 38, Table 2, Case 8-C requires the following:

The vertical separation between communication cables on other supports at different levels (excepting on related line and buck arms) on the same pole requires a 12 inch clearance.

ESRB's finding is listed in Table 4:

Table 4: GO 95, Rule 38, Table 2, Case 8-C Finding

Location #	Finding
11	The vertical spacing between Mediacom's and AT&T's facilities on the pole is less than 12 inches.

5. **GO 95, Rule 38, Table 2, Case 16-C** requires the following:

   The radial separation of conductors on the same crossarm, pole or structure between conductors, taps or lead wires of different circuits requires at least three inches of separation from communication conductors.

ESRB's findings are listed in Table 5:

Table 5: GO 95, Rule 38, Table 2, Case 16-C Findings

Location #	Findings
1	Mediacom's service drop is contacting AT&T's communication circuit at the tap (tap cleanup).
2	Mediacom's service drop is contacting AT&T's communication circuit at the tap (tap cleanup).
3	Mediacom's service drop is contacting AT&T's communication circuit at the tap (tap cleanup).
8	Mediacom's service drop is contacting AT&T's communication circuit at the tap (tap cleanup).
9	Mediacom's service drop is contacting AT&T's communication circuit at the tap (tap cleanup).
10	Mediacom's service drop is contacting AT&T's communication circuit at the tap (tap cleanup).
12	Mediacom's cable span is wrapped around AT&T's span at approximately midspan.
13	Mediacom's service drop is contacting AT&T's communication circuit at the tap (tap cleanup).
17	Mediacom's service drop is laying on top of AT&T's span at approximately midspan.
18	Mediacom's cable span is contacting AT&T's span at the intersection crossover.
20	Mediacom's service drop is contacting AT&T's communication circuit at the tap (tap cleanup).
22	Mediacom's service drop is contacting AT&T's communication circuit at the tap (tap cleanup).
29	Mediacom's service drop is resting on top of AT&T's communication span.

Location #	Findings
31	Mediacom's service drops and abandoned lines are contacting AT&T's communication circuit at the tap (tap cleanup).
49	Mediacom's span is contacting AT&T's fiber span.
50	Mediacom's span is contacting AT&T's telephone span.
53	Mediacom's service drop is resting on top of AT&T's communication span.
58	Mediacom's service drops are contacting AT&T's communication circuit at the tap (tap cleanup).
60	Mediacom's span and an amplifier are contacting AT&T's span.
62	Mediacom's span is contacting AT&T's telephone span.
66	Mediacom's span is contacting AT&T's telephone span.
67	Mediacom's service drops are contacting AT&T's communication circuit at the tap (tap cleanup).
69	Mediacom's fiber loop is in proximity to AT&T's telephone span.
70	Mediacom's service drops are contacting AT&T's communication circuit at the tap (tap cleanup).
72	Mediacom's span is contacting AT&T's telephone span.
75	Mediacom's service drops are contacting AT&T's communication circuit.
76	Vegetation is causing Mediacom's span to contact AT&T's span. Mediacom's service drops at the tap are in proximity to AT&T's facilities.
79	An unlashed Mediacom cable is in proximity to AT&T's facilities.
81	Mediacom's service drop loop is contacting AT&T's service drop.
84	One of Mediacom's service drops is in proximity to AT&T's communication circuit at the tap (tap cleanup).
86	Mediacom's service drops are contacting AT&T's communication circuit at the tap (tap cleanup).
99	Mediacom's cable span is contacting AT&T's telephone span at the midspan.
103	Mediacom's service drops are contacting AT&T's communication circuit at the tap (tap cleanup).

6. **GO 95, Rule 83.4, Bonding** states:

> *"When separate communication messengers, or guys, or both, of the same or different ownership, are attached to the same pole, and they are in proximity to electric supply circuits (see Rule 21.5- D), railway signal circuits or Class T electric railway or trolley circuits, such messengers, or guys, or both, shall be*

bonded together at frequent intervals (see Rule 83.4-A). For purposes of this rule, communication messengers and guys are those which support Class C Circuits (see Rule 20.6) and those Class C Circuits which are used for television transmission."

ESRB's finding is listed in Table 6:

Table 6: GO 95, Rule 83.4 Finding

Location #	Finding
111	Mediacom's facilities are not bonded to the installed ground wire.

7. **GO 95, Rule 84.4-A(2), Clearances, In Rural Districts** states:

*"The clearance of Table 1, Case 4, Column B may be reduced to not less than 13 feet above ground along thoroughfares in rural districts where no part of the line overhangs any part of the thoroughfare which is ordinarily traveled and where it is unlikely that vehicles will be required to cross under the communication conductors.***"**

ESRB's finding is listed in Table 7:

Table 7: GO 95, Rule 84.4-A(2) Finding

Location #	Finding
86	The communication span is lying on the customer's fence.

8. **GO 95, Rule 84.4-A(3), Clearances, Accessible to Pedestrians Only** states:

"Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet."

ESRB's finding is listed in Table 8:

Table 8: GO 95, Rule 84.4-A(3) Finding

Location #	Finding
85	The service drop in the customer's backyard is only about 5' above ground.

9. **GO 95, Rule 84.4-A(6), Clearances, Across or along Public Thoroughfares** states:

> *"Communication conductors over or across public thoroughfares shall have a clearance of 18 feet above ground (Table 1, Case 3, Column B). A reduced clearance to 16 feet is permitted for the portions of communication conductors where no part of the line overhangs any part of the thoroughfare which is ordinarily traveled, or where the line is behind an established curb, ditch or berm that serves to protect such communication conductors from encroachment by vehicular traffic."*

ESRB's findings are listed in Table 9:

Table 9: GO 95, Rule 84.4-A(6) Findings

Location #	Findings
2	The service drop that crosses the road is only 13' above ground.
13	The service drop that crosses the road is only 12' 3" above ground.
25	The cable span that crosses the road is only 16' above ground at the center of the road.
47	The cable span that crosses the road is only 15'9" above ground at the center of the road.
88	The service drop that crosses the road is only 8' above ground at the center of the road. Mediacom temporarily repaired this issue during the audit.

10. **GO 95, Rule 84.6-B, Ground Wires** states:

> *"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. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.*
>
> *Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8)."*

ESRB's findings are listed in Table 10:

Table 10: GO 95, Rule 84.6-B Findings

Location #	Findings
1	The wooden ground molding is damaged and exposes the ground wire.
2	The wooden ground molding is separating from the pole and exposes the ground wire.
10	The wooden ground molding is damaged and exposes the ground wire near the bottom of the pole.
13	The wooden ground molding is damaged and exposes the ground wire.
18	The wooden ground molding is damaged and exposes the ground wire at the bottom of the pole.
19	The wooden ground molding does not reach the ground surface and exposes the ground wire.
22	The wooden ground molding is damaged and exposes the ground wire.
27	The plastic ground molding cover is damaged and exposes the ground wire.
42	The plastic ground molding cover is damaged and exposes the ground wire.
57	The wooden ground molding exposes the ground wire at a section about four feet below the communication level of the pole.
100	The plastic ground molding is damaged and exposes the ground wire.
111	There is a gap in the wooden ground molding that exposes the ground wire.

11. GO 95, Rule 84.6-D, Vertical Runs states in part:

> *"Runs of bridled conductors, attached to surface of pole, need not be covered provided such runs are below the guard arm and in the same quadrant as the longitudinal cable, or where such runs are below and on the same side of pole with a cable arm and are not in the climbing space, or are connected to service drops which are placed in accordance with the provisions of Rule 84.8–B2b. Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches."*

ESRB's findings are listed in Table 11:

Table 11: GO 95, Rule 84.6-D Findings

Location #	Findings
8	The vertical run is not secured to the pole at intervals of not more than 24 inches.
57	The vertical run is not secured to the pole at intervals of not more than 24 inches.
73	The vertical run is not secured to the pole at intervals of not more than 24 inches.
80	The vertical run is not secured to the pole at intervals of not more than 24 inches.
86	The vertical run is not secured to the pole at intervals of not more than 24 inches.
96	The vertical run is not secured to the pole at intervals of not more than 24 inches.
102	The vertical run is not secured to the pole at intervals of not more than 24 inches.

12. GO 95, Rule 86.4-C(4), Clearances, Passing on Same Poles states:

> *"The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall be not less than as specified in Table 2, Case 19 except that the clearance between guys and communication messenger and/or able attached directly to surface of pole may be less than the 3 inches specified in Table 2, Case 19, Column C provided: the guy is not a guy in proximity, or all parts of the guy are not less than 6 feet below 0 - 750 volt supply conductors supported on same pole, and a wood guard or equivalent is placed on the messenger and/or cable; also, a guy attached to a pole which supports supply conductors at a distance of not less than 6 feet above communication messenger and/or cable shall (1) have an insulator placed in the guy above the communication messenger and/or cable, at a distance of not less than 6 feet horizontally from the pole, or (2) have an insulator placed in the guy not less than 3 inches nor more than 6 inches above the messenger and/or cable, and a wood guard or equivalent placed on the messenger and/or cable."*

ESRB's findings are listed in Table 12:

Table 12: GO 95, Rule 86.4-C(4) Findings

Location #	Findings
24	Mediacom's cable span is contacting PG&E's down guy above the sectionalizing insulator.
92	Mediacom's cable span is less than three inches from PG&E's down guy.

Location #	Findings
100	Mediacom's service drop is contacting AT&T's down guy.

13. 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."*

ESRB's finding is listed in Table 13:

Table 13: GO 95, Rule 86.9 Finding

Location #	Finding
88	Mediacom's down guy is missing a guy marker.

14. GO 95, Rule 87.4-C(3), Clearances, Between Conductors and Cables, Attached to Poles states in part:

> *"Cables or messengers where attached to the surface of poles which support supply conductors, shall not be less than 6 feet vertically below the level of supply conductors.*
>
> > *EXCEPTION: This minimum clearance of 6 feet may be reduced to not less than 4 feet below supply conductors of 0 - 750 volts provided a guard arm is placed above the messenger and cable (or self–supporting cable) in accordance with the provision of Rule 87.7–B (see Rule 21.0–D for guard arm definition). No cable or messenger shall be attached to the surface of such a pole less than 2 feet below the lowest level of communication conductors on crossarms unless a minimum horizontal separation of 30 inches is maintained between the messenger or cable and the communication conductors on the opposite side of pole."*

ESRB's finding is listed in Table 14:

Table 14: GO 95, Rule 87.4 Finding

Location #	Finding
11	The communication cables are less than six feet from the street light fixture and are not protected by a guard arm.

15. 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."*

ESRB's findings are listed in Table 15:

Table 15: GO 128, Rule 17.1 Findings

Location #	Findings
5	The pedestal could not be securely closed.
6	The pedestal could not be securely closed.
7	The pedestal enclosure is damaged.
38	The pedestal enclosure cannot close because it is too small to fit the amplifier. Additionally, the amplifier was not bonded to the ground rod.

16. 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 16:

Table 16: GO 128, Rule 17.8 Findings

Location #	Findings
104	The pedestal was not marked with any ownership identification.
105	The pedestal was not marked with any ownership identification.
106	The pedestal was not marked with any ownership identification.

17. GO 128, Rule 43.3-C, Depths states:

> *"Communication cables shall be installed at a minimum depth below the surface under which they are located as follows except as provided in Rule 43.3–D:*

(1) Sidewalks, Parkways and Private Property: 12 inches"

ESRB's finding is listed in Table 17:

Table 17: GO 128, Rule 43.3 Finding

Location #	Finding
39	The cable travels from a pedestal to a handhole. The cable is not buried and is laying on the sidewalk

V. Observations

1. **GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards** states in part:

   (2) "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.

   (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."

Table 18 includes all non-Mediacom (third-party) findings that ESRB observed during the audit:

Table 18: Observations

Location #	Observations
2	AT&T's service drop is abandoned. One of AT&T's service drops is only 15' 2" above the road. PG&E's service drop is resting on top of Mediacom's service drop.
4	AT&T's service drop is abandoned.
8	There is an abandoned AT&T service drop wrapped around the pole. PG&E's ground molding is damaged.
10	Vegetation is contacting above PG&E's down guy insulator, which creates a path to ground.

Location #	Observations
11	AT&T's riser cables are not covered from the ground level to eight feet above the ground.
12	AT&T's uncovered vertical run is not secured to the pole at intervals of not more than 24 inches.
13	PG&E's crossarm is starting to split. PG&E's service drop is only 15' above the ground surface. PG&E's ground molding is damaged and exposes the ground wire. AT&T's service drop across the road is only 12' 3" above the ground surface.
14	AT&T's service drop is resting on top of Mediacom's service drops. Vegetation is contacting above PG&E's down guy insulator, which creates a path to ground.
16	PG&E's ground molding is damaged at a section below the communication guard arm.
19	AT&T's service drop is abandoned.
21	PG&E's service drop to 6713 Sayre Ave is low enough to be grabbed from the ground. PG&E's down guys are loose. AT&T's service drop is abandoned.
22	Vegetation is causing strain on AT&T's cable span.
24	PG&E's ground molding is damaged and exposes the ground wire. AT&T's uncovered vertical run is not secured to the pole at intervals of not more than 24 inches.
25	AT&T's telephone wire is abandoned. Vegetation is possibly causing strain and abrasion on AT&T's span.
26	AT&T's service drop is abandoned. AT&T is possibly missing a down guy. There is a down guy attachment point on the pole at AT&T's service level and a down guy anchor in the ground, but there is no down guy.
27	AT&T's service drop is abandoned.
28	PG&E's service drop is resting on top of Mediacom's service drop.
31	There are several large woodpecker holes along the length of the pole. AT&T's service drop is abandoned and wrapped around the pole.
32	AT&T's service drop is abandoned.
37	AT&T's telephone pedestal is damaged.
40	AT&T's service drop is abandoned. PG&E's service drop is lying on AT&T's telephone span.
44	Two of AT&T's service drops are abandoned.

Location #	Observations
47	A large section of the outer shell of AT&T's wood pole is damaged. The pole also shows movement/displacement at the ground surface. AT&T's service drop to the home at 2489 Big Valley Rd, Lakeport, is low and is resting on top of the customer's roof.
48	AT&T's lashing wire is broken. AT&T's uncovered vertical run is not secured to the pole at intervals of not more than 24 inches.
54	AT&T's telephone span has a clearance of less than one foot from PG&E's service drop.
56	AT&T's telephone span has a clearance of less than three inches from the section of PG&E's down guy above the sectionalizing insulator.
65	There are abandoned AT&T facilities lying on the ground.
69	AT&T's uncovered vertical run is not secured to the pole at intervals of not more than 24 inches.
71	AT&T's service drop is contacting Mediacom's span.
73	AT&T's uncovered vertical run is not secured to the pole at intervals of not more than 24 inches.
74	AT&T's service drop is abandoned.
75	AT&T's overhead enclosure is secured to the main strand with rope.
77	Both of AT&T's down guys are slacked.
78	AT&T needs to transfer its communication facilities to the new pole.
80	AT&T's uncovered vertical run is not secured to the pole at intervals of not more than 24 inches.
85	AT&T's service drop in the customer's backyard is only about 5' above ground.
87	AT&T's facilities are attached to the pole with rope.
89	PG&E's pole visibility strip is damaged.
90	AT&T's lashing wire is broken.
91	PG&E's down guy is loose on the new pole. AT&T needs to transfer its facilities to the new pole. AT&T's down guy is loose on the old pole.
94	AT&T's lashing wire is broken.
95	A spool of AT&T's telephone wires are abandoned and wrapped around the lowest pole step.
96	AT&T's service drop is abandoned.
97	AT&T's service drop is abandoned.

Location #	Observations
99	There is an abandoned AT&T down guy anchor head that sticks above ground and is causing a tripping hazard.
100	AT&T's down guy is slacked.
102	AT&T's uncovered vertical run is not secured to the pole at intervals of not more than 24 inches.
109	AT&T's service drop is abandoned.
114	AT&T's down guy is loose and missing a down guy marker.
115	PG&E's service drop is coming loose from its messenger span.