

## PUBLIC UTILITIES COMMISSION

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September 16, 2024

CA2024-1183

John Gutierrez  
Senior Director- Government Affairs  
Comcast  
3055 Comcast Place, Livermore, CA 94551

**SUBJECT:** Communications Infrastructure Provider (CIP) Audit of Comcast's West Bay Region

Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell and Sajjad Mansuri of ESRB staff conducted a CIP audit of Comcast West Bay Region from April 15, 2024 through April 19, 2024. During the audit, ESRB staff conducted field inspections of Comcast'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 October 14, 2024, via electronic copy of all corrective actions and preventive measures taken by Comcast 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 Samuel Mandell at (916) 217-8294 or [samuel.mandell@cpuc.ca.gov](mailto:samuel.mandell@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 Audit Findings of Comcast West Bay Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC  
Nika Kjensli, Program Manager, ESRB, SED, CPUC  
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Jason Aguas, Manager Regulatory Affairs – California, Comcast

**COMCAST WEST BAY REGION  
COMMUNICATIONS AUDIT FINDINGS  
April 15 – 19, 2024**

**I. Records Review**

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Comcast's West Bay Region:

- The U-Safe Program, General Order (GO) 95/128 Repair and Reporting Documentation, version March 2, 2010.
- Facility statistics as of February 2024, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Overhead and Underground facility maps as of February 2024.
- Inspection and patrol records containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings and repairs from February 2019 through February 2024.
- Safety Hazards Notifications received from third-party utilities from February 2019 through February 2024.
- Safety Hazards Notifications sent to third-party utilities from February 2019 through February 2024.
- Pole loading calculations, including intrusive testing for Tier 2 and Tier 3 High Fire Threat Districts from February 2023 through February 2024.
- Employee statistics and employee training records from January 2021 through February 2024.
- Employee training materials, including the Comcast Outside Plant Handbook for Clearances and Regulations in California, contractor training PowerPoint on GO 95, and the Patrol Inspection Training Form.
- New construction projects from February 2023 through February 2024.

## II. Records Violations

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

### 1. GO 95, Rule 18-B, Maintenance Programs states in part:

*“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.*

*The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company’s facilities.”*

(1) *“Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.*

a. *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 reviewed Comcast’s West Bay Region notifications from February 2019 through February 2024 and found that Comcast completed 1,605 (3.2%) work orders late out of a total of 49,908. Table 1 breaks down the total late work orders for the West Bay Region by county and priority level.

**Table 1: West Bay Region Late Work Orders**

<b>Priority Levels</b>	<b>San Francisco</b>	<b>San Mateo</b>	<b>Total</b>
1	18	30	48
2	609	948	1557
<b>Total</b>	<b>627</b>	<b>978</b>	<b>1605</b>

Table 1 includes both late completed work orders and the late pending work orders for each county. Late completed work orders are any work orders completed after the due dates that apply to the work orders’ priority level per GO 95, Rule 18-B. Pending work orders are any work orders that were still open with a due date prior to February 28, 2024.

The most overdue Priority 1 work order is Notice 120945986. It was created on May 6, 2021 for a dead tree that was used for a guy anchor and had a due date of August 4, 2021. The notice was completed on May 18, 2023 and was 652 days late.

The most overdue Priority 2 work order was identified during a patrol of the pole at 2021 Belle Monti Ave. It was created on February 15, 2019 for HSD out and had a required due date of August 14, 2019. As of February 28, 2024 the notice was still pending and was 1659 days late.

### III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure Type	Approximate GPS Coordinates
1	Pole	37.47095° N, 122.20173° W
2	Pole	37.47136° N, 122.20142° W
3	Pole	37.47175° N, 122.20127° W
4	Pole	37.47206° N, 122.20102° W
5	Pole	37.48043° N, 122.25270° W
6	Pole	37.48069° N, 122.25295° W
7	Pole	37.48106° N, 122.25347° W
8	Pole	37.48141° N, 122.25390° W
9	Vault	37.80631° N, 122.40738° W
10	Vault	37.80625° N, 122.40708° W
11	Pole	37.80619° N, 122.40718° W
12	Pole	37.80635° N, 122.40709° W
13	Pole	37.80589° N, 122.40700° W
14	Pole	37.80589° N, 122.40700° W
15	Vault	37.80533° N, 122.40691° W
16	Vault	37.80639° N, 122.42042° W
17	Vault	37.80609° N, 122.42037° W
18	Vault	37.80564° N, 122.42064° W
19	Vault	37.80554° N, 122.42133° W
20	Vault	37.80550° N, 122.42161° W
21	Vault	37.80586° N, 122.42203° W
22	Vault	37.80489° N, 122.42199° W
23	Vault	37.80471° N, 122.42198° W
24	Vault	37.80456° N, 122.42224° W
25	Vault	37.80457° N, 122.42256° W
26	Vault	37.80487° N, 122.42365° W
27	Pole	37.79751° N, 122.42404° W
28	Pole	37.79751° N, 122.42441° W
29	Pole	37.79746° N, 122.42485° W
30	Pole	37.79742° N, 122.42520° W
31	Vault	37.79768° N, 122.42548° W
32	Vault	37.80012° N, 122.43624° W
33	Vault	37.80086° N, 122.43572° W
34	Vault	37.80098° N, 122.43535° W
35	Vault	37.80095° N, 122.43518° W
36	Vault	37.80093° N, 122.43471° W

37	Vault	37.80001° N, 122.43473° W
38	Vault	37.78688° N, 122.42515° W
39	Vault	37.78663° N, 122.42503° W
40	Vault	37.78613° N, 122.42635° W
41	Vault	37.78626° N, 122.42532° W
42	Vault	37.77482° N, 122.45391° W
43	Vault	37.77482° N, 122.45391° W
44	Pole	37.77522° N, 122.45462° W
45	Pole	37.77555° N, 122.45478° W
46	Pole	37.77566° N, 122.45442° W
47	Pole	37.77575° N, 122.45408° W
48	Pole	37.77575° N, 122.45359° W
49	Pole	37.77579° N, 122.45330° W
50	Pole	37.77580° N, 122.45320° W
51	Vault	37.77437° N, 122.45829° W
52	Vault	37.77469° N, 122.45847° W
53	Vault	37.77518° N, 122.45833° W
54	Vault	37.77526° N, 122.45817° W
55	Pole	37.77526° N, 122.45817° W
56	Pole	37.77526° N, 122.45789° W
57	Pole	37.77531° N, 122.45752° W
58	Pole	37.77539° N, 122.45704° W
59	Pole	37.77542° N, 122.45661° W
60	Vault	37.77247° N, 122.51004° W
61	Vault	37.77300° N, 122.51011° W
62	Vault	37.77338° N, 122.50999° W
63	Vault	37.77337° N, 122.50951° W
64	Pole	37.77343° N, 122.50888° W
65	Pole	37.77323° N, 122.50890° W
66	Pole	37.77280° N, 122.50895° W
67	Pole	37.77240° N, 122.50882° W
68	Pole	37.77217° N, 122.50881° W
69	Pole	37.75856° N, 122.50763° W
70	Pole	37.75858° N, 122.50717° W
71	Pole	37.75863° N, 122.50677° W
72	Pole	37.75862° N, 122.50637° W
73	Pole	37.73410° N, 122.49654° W
74	Pole	37.73436° N, 122.49652° W
75	Pole	37.73460° N, 122.49651° W
76	Pole	37.73464° N, 122.49599° W
77	Vault	37.73397° N, 122.49728° W
78	Vault	37.73400° N, 122.49765° W

79	Wall Terminal	37.70060° N, 122.48530° W
80	Wall Terminal	37.70077° N, 122.48514° W
81	Wall Terminal	37.70055° N, 122.48497° W
82	Wall Terminal	37.70055° N, 122.48497° W
83	Wall Terminal	37.70040° N, 122.48492° W
84	Vault	37.70205° N, 122.48079° W
85	Vault	37.70175° N, 122.48066° W
86	Vault	37.70136° N, 122.48045° W
87	Vault	37.70057° N, 122.48011° W
88	Pole	37.54178° N, 122.50363° W
89	Pole	37.54225° N, 122.50341° W
90	Pole	37.54225° N, 122.50341° W
91	Pole	37.54225° N, 122.50341° W
92	Pole	37.50187° N, 122.46741° W
93	Pole	37.50212° N, 122.46763° W
94	Pole	37.50234° N, 122.46780° W
95	Pole	37.46311° N, 122.43034° W
96	Pole	37.46346° N, 122.43031° W
97	Pole	37.46368° N, 122.43031° W
98	Pole	37.46362° N, 122.42981° W
99	Pole	37.46316° N, 122.42942° W
100	Pole	37.46254° N, 122.42896° W
101	Pole	37.46247° N, 122.42866° W
102	Pole	37.46261° N, 122.42796°
103	Pole	37.46249° N, 122.42750° W
104	Pole	37.57594° N, 122.34098° W
105	Pole	37.57616° N, 122.34065° W
106	Pole	37.57636° N, 122.34030° W
107	Pole	37.57563° N, 122.34061° W
108	Pole	37.57537° N, 122.34032° W
109	Pole	37.57514° N, 122.33999° W
110	Pole	37.56731° N, 122.32952° W
111	Pole	37.56749° N, 122.32926° W
112	Pole	37.56760° N, 122.32914° W
113	Pole	37.56768° N, 122.32905° W



#### IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

**1. GO 95, Rule 12.2** states:

*“All lines and portions of lines shall be maintained in such condition as to provide safety factors not less than those specified in Rule 44.3. Lines and portions of lines constructed or reconstructed on or after the effective date of this Order shall be kept in conformity with the requirements of this Order. The restoration of clearance originally established prior to the effective date of this Order, where the original clearance has been reduced by additional sagging or other causes, is not considered to be reconstruction and the reestablished clearance shall conform to the requirements of the rules in effect at the time the original clearance was established. The changing of clearance for any other purpose is reconstruction and clearances so changed shall comply with the rules of this Order applicable to reconstruction.”*

ESRB’s finding related to the above rule is listed in Table 2:

**Table 2: GO 95, Rule 12.2 Finding**

Location	Finding
46	Comcast needs to complete transfer off the deteriorated pole

**2. 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 finding related to the above rule is listed in Table 3:

**Table 3: GO 95, Rule 31.1 Finding**

Location	Finding
100	The guy anchor is buried

**3. 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 related to the above rule are listed in Table 4:

**Table 4: GO 95, Rule 84.6-B Findings**

<b>Location</b>	<b>Findings</b>
<b>64</b>	Ground wire cover is damaged
<b>66</b>	Ground wire cover is damaged

**4. GO 95, Rule 37, Service Drops, Clearances above Ground and Buildings** states:

*“Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.*

*The clearances specified in Table 1, Case 1, Columns A, B, D, E and F, shall in no case be reduced more than 5% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions. The clearances specified in Table 1, Cases 2 to 6 inclusive, shall in no case be reduced more than 10% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions.*

*The clearance specified in Table 1, Case 1, Column C (22.5 feet), shall in no case be reduced below the tabular value because of temperature and loading as specified in Rule 43.*

*The clearances specified in Table 1, Cases 11, 12 and 13, shall in no case be reduced below the tabular values because of temperatures and loading as specified in Rule 43. Where supply conductors are supported by suspension insulators at crossings over railroads which transport freight cars, the initial clearances shall be sufficient to prevent reduction to clearances less than 95% of the clearances specified in Table 1, Case 1, through the breaking of a conductor in either of the adjoining spans. Where conductors, dead ends, and metal pins are concerned in any clearance specified in these rules, all clearances of less than 5 inches shall be applicable from surface of conductors (not including tie wires), dead ends, and metal pins, except clearances between surface of crossarm and conductors supported on pins and insulators (referred to in Table 1, Case 9) in which case the minimum clearance specified shall apply between center line of conductor and surface of crossarm or other line structure on which the conductor is supported. All clearances of 5 inches or more shall be applicable from the center lines of conductors concerned. When measuring the minimum allowable vertical conductor clearances in a span, the minimum clearance applies to the specific location under the span being measured and not for the entire span.”*

ESRB’s findings related to the above rule are listed in Table 5:

**Table 5: GO 95, Rule 37 Findings**

<b>Location</b>	<b>Findings</b>
<b>58</b>	Low service drop
<b>69</b>	Low service drop
<b>90</b>	Low service drop

**5. GO 95 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 finding related to the above rule is listed in Table 6:

**Table 6: GO 95, Rule 84.6-D Finding**

Location	Finding
30	The cables are not secured to the pole

**6. GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground** states:

*“Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:*

*a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or*

*b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8”*

ESRB’s findings related to the above rule are listed in Table 7:

**Table 7: GO 95, Rule 87.7-D(1) Findings**

Location	Findings
11	The riser guard at the base of the pole is damaged
98	Test cable needs to be moved to riser guard
100	Riser guard not secured to pole
102	No riser guard
103	No riser guard

**7. 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 related to the above rule are listed in Table 8:

**Table 8: GO 128, Rule 17.1 Findings**

<b>Location</b>	<b>Findings</b>
<b>79</b>	The wall mounted enclosure was unsecured and found open
<b>80</b>	The wall mounted enclosure was unsecured and found open
<b>81</b>	The wall mounted enclosure was unsecured and found open
<b>82</b>	The wall mounted enclosure was unsecured and found open
<b>83</b>	The wall mounted enclosure was unsecured and found open

**8. 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. (Also see Rule 17.8, and Appendix B, Figs. 9 and 17.) If the cover of a subsurface equipment enclosure is a grate a means shall be provided to prevent tampering with the equipment housed therein.”*

ESRB’s findings related to the above rule are listed in Table 9:

**Table 9: GO 128, Rule 32.7 Findings**

Location	Findings
34	Lid rings are damaged, lid can't be removed without replacement
52	Vault lid is damaged
54	Lid rings are damaged, lid can't be removed without replacement
60	Lid rings are damaged, lid can't be removed without replacement
63	Lid is stuck and can't be removed without replacement

**V. Observations**

**1. 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 18-A, 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 GO 95.”*

During the field inspection, ESRB noted the third-party safety concerns listed in Table 10. While in the field, Comcast created and sent third-party notifications to the respective utilities for the items below:

**Table 10: Third-Party Observations**

<b>Location</b>	<b>Entity</b>	<b>Observations</b>
<b>1</b>	AT&T	Needs to complete pole transfer and cover riser
<b>2</b>	AT&T	Abandoned service drop
<b>3</b>	AT&T	Missing riser guard, riser not secured to pole
<b>4</b>	AT&T	Missing riser guard, riser not secured to pole
<b>8</b>	PG&E	Vegetation contact above guy sectionalizer
<b>12</b>	AT&T	Abandoned service drop
<b>13</b>	PG&E	The pole is deteriorated and needs to be replaced
<b>29</b>	AT&T	Broken ground wire cover
<b>46</b>	AT&T	Need to complete pole transfer
<b>48</b>	AT&T	Low service drop
<b>50</b>	AT&T	Damaged riser cover
<b>56</b>	AT&T	Abandoned service drop
<b>57</b>	AT&T	Damaged and unsecured riser cover
<b>58</b>	AT&T	Low service drop
<b>59</b>	AT&T	Broken guard arm
<b>65</b>	AT&T	Damaged riser cover
<b>66</b>	AT&T	Abandoned guy hanging on pole
<b>68</b>	PG&E	Damaged ground wire cover
<b>71</b>	AT&T	Abandon service drop
<b>72</b>	AT&T	Need to complete pole transfer
<b>88</b>	PG&E	Pole leaning greater than 10%
<b>88</b>	AT&T	Slack down guy
<b>90</b>	AT&T	Low service drop
<b>92</b>	AT&T	Missing riser guard

<b>Location</b>	<b>Entity</b>	<b>Observations</b>
<b>93</b>	AT&T	Riser not secured to pole, missing riser guard
<b>94</b>	AT&T	Riser not secured to pole, missing riser guard
<b>101</b>	PG&E	Damaged ground wire cover
<b>105</b>	PG&E	Damaged ground wire cover and riser guard
<b>106</b>	PG&E	Low service drop
<b>107</b>	AT&T	Riser guard is not secured to the pole
<b>109</b>	PG&E	Low service drop
<b>109</b>	AT&T	Riser guard is not 8'
<b>112</b>	AT&T	Abandoned service drop, down guys contacting span