PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

September 20, 2024 CA2024-1230

John Gutierrez
Senior Director- Government Affairs
Comcast

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

Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Matthew Yunge and Samuel Mandell of ESRB staff conducted a CIP audit of Comcast South Bay Region from July 22, 2024 through July 26, 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 18, 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 Matthew Yunge at (415) 603-9828 or Matthew.Yunge@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 Comcast South Bay Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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COMCAST SOUTH BAY REGION
COMMUNICATIONS AUDIT FINDINGS
July 22 – 26, 2024

I. Records Review

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

- The U-Safe Program, General Order (GO) 95/128 Repair and Reporting Documentation, version March 2, 2010.
- Facility statistics as of May 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 May 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 May 2019 through May 2024.
- Safety Hazards Notifications received from third-party utilities from May 2019 through May 2024.
- Safety Hazards Notifications sent to third-party utilities from May 2019 through May 2024.
- Pole loading calculations, including intrusive testing for Tier 2 and Tier 3 High Fire Threat Districts from May 2023 through May 2024.
- Employee statistics and employee training records from January 2021 through May 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 May 2023 through May 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's review of Comcast's South Bay Region work orders from May 2019 through May 2024 found that Comcast completed a total of 2,069 work orders late out of 69,835.[1] Table 1 breaks down the total late work orders for the South Bay Region by county and priority level.

Table 1: South Bay Region Late Work Orders

Priority Levels	Monterey	Santa Clara	Santa Cruz	Total
1	541	438	591	1,570
2	23	441	35	499
Total	564	879	626	**2,069**

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 May 31, 2024.

Table 2 below shows the most overdue work orders.

Table 2: South Bay Region Most Overdue Work Orders

Location	Priority Level	Inspection date	Due Date	Days Late	Deficiency Description
14381 ELVA AVE 95070	1	2022-04-01	2022-04-02	616	HVY TT (HEAVY TREE TRIMMING, TREES PULLING DOWN CABLE BUNDLE?)
6012 SHAWCROFT DR	2	2019-05-01	2022-05-01	761	CDV RC

[1] Total is the sum of inspections and patrols which were marked as either a "FAIL" or "REPAIR"

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure Type	Approximate GPS Coordinates
1	Wood Pole	-122.0721837, 37.39110036
2	Wood Pole	-122.07201205, 37.39119327
3	Wood Pole	-122.07200435, 37.39130428
4	Wood Pole	-122.07239449, 37.3907197
5	Wood Pole	-122.07246142, 37.39064813
6	Wood Pole	-122.07368821, 37.37337604
7	Wood Pole	-122.07369632, 37.37302756
8	Wood Pole	-122.07375335, 37.37283037
9	Wood Pole	-122.0736855, 37.37229037
10	Wood Pole	-121.66166363, 36.69961256
11	Wood Pole	-121.66215151, 36.69935526
12	Underground Vault	-121.60650637, 36.7091609
13	Underground Vault	-121.60646163, 36.70918076
14	Underground Vault	-121.60691039, 36.70935129
15	Underground Vault	-121.60654137, 36.70984909
16	Underground Vault	-121.60603861, 36.70987531
17	Underground Vault	-121.60578756, 36.70966804
18	Pedestal	-121.60532154, 36.70921454
19	Wood Pole	-121.60224326, 36.67409566
20	Wood Pole	-121.60256783, 36.67447508
21	Wood Pole	-121.60285405, 36.67414811
22	Wood Pole	-121.60322572, 36.67416479
23	Wood Pole	-121.60358228, 36.67412608
24	Pedestal	-121.60242861, 36.67462983
25	Pedestal	-121.60267316, 36.67486996
26	Pedestal	-121.60275484, 36.6754855
27	Pedestal	-121.6024195, 36.67539157
28	Pedestal	-121.66991183, 36.65727705
29	Pedestal	-121.67024234, 36.65742108
30	Pedestal	-121.67072937, 36.65747388
31	Pedestal	-121.67095891, 36.65714655
32	Pedestal	-121.6703944, 36.65686719
33	Underground Vault	-121.67025134, 36.65674262
34	Pedestal	-121.66935892, 36.65698101
35	Underground Vault	-121.66959848, 36.6571971
36	Wood Pole	-121.90208511, 36.53899761

37	Wood Pole	-121.9021116, 36.53963523
38	Wood Pole	-121.90215778, 36.54033851
39	Wood Pole	-121.90213857, 36.54047609
40	Wood Pole	-121.90209957, 36.54103492
41	Wood Pole	-121.90215428, 36.54146808
42	Wood Pole	-121.90212768, 36.53855655
43	Wood Pole	-121.92827202, 36.54179824
44	Wood Pole	-121.92872961, 36.54200603
45	Wood Pole	-121.92901476, 36.54205852
46	Wood Pole	-121.92936285, 36.54210044
47	Wood Pole	-121.9295035, 36.5417538
48	Wood Pole	-121.93533851, 36.60322409
49	Wood Pole	-121.93597162, 36.60289195
50	Wood Pole	-121.93557836, 36.60325006
51	Wood Pole	-121.93571991, 36.60351979
52	Pedestal	-121.87147981, 36.95405863
53	Underground Vault	-121.87171892, 36.95398784
54	Pedestal	-121.87188582, 36.95402378
55	Pedestal	-121.87218039, 36.95389233
56	Underground Vault	-121.87230725, 36.95398042
57	Pedestal	-121.87227553, 36.9540607
58	Pedestal	-121.87190381, 36.95410341
59	Pedestal	-121.87130927, 36.95418597
60	Pedestal	-121.87101379, 36.95447402
61	Pedestal	-121.8708753, 36.95498125
62	Wood Pole	-121.90196637, 36.97175863
63	Wood Pole	-121.90233748, 36.97162666
64	Wood Pole	-121.90269256, 36.97148079
65	Wood Pole	-121.90259024, 36.97116639
66	Wood Pole	-121.90261277, 36.9707571
67	Wood Pole	-121.9027752, 36.97046629
68	Wood Pole	-121.97289551, 36.96463003
69	Wood Pole	-121.97283495, 36.96471638
70	Wood Pole	-121.97281753, 36.96498271
71	Wood Pole	-121.97280423, 36.9653539
72	Wood Pole	-121.97282771, 36.96589116
73	Wood Pole	-121.97278094, 36.96624309
74	Wood Pole	-121.97291192, 36.96643774
75	Wood Pole	-121.98087994, 36.98072593
76	Wood Pole	-121.98054232, 36.98075702
77	Wood Pole	-121.98013157, 36.98066755

78	Wood Pole	-121.97979368, 36.98057939
79	Wood Pole	-122.07948376, 37.07644227
80	Wood Pole	-122.07898036, 37.07688741
81	Wood Pole	-122.0791294, 37.07727108
82	Wood Pole	-122.07931949, 37.07773219
83	Wood Pole	-122.07950822, 37.07818641
84	Pedestal	-122.00332792, 37.06568295
85	Pedestal	-122.00379071, 37.06628144
86	Pedestal	-122.00375607, 37.06646041
87	Pedestal	-122.00342503, 37.06711003
88	Pedestal	-122.0030601, 37.06745681
89	Pedestal	-122.00242711, 37.06744608
90	Pedestal	-122.00245901, 37.0668996
91	Pedestal	-122.00253973, 37.06653228
92	Pedestal	-122.0022344, 37.06591068
93	Pedestal	-122.00212957, 37.06527317
94	Pedestal	-122.00278278, 37.0651352
95	Wood Pole	-121.98051976, 37.21770077
96	Wood Pole	-121.98120328, 37.2172883
97	Underground Vault	-121.9811591, 37.21693571
98	Underground Vault	-121.98204421, 37.21665359
99	Underground Vault	-121.98206305, 37.21685737
100	Wood Pole	-121.98088705, 37.21601636
101	Wood Pole	-121.98086919, 37.21561298
102	Wood Pole	-122.02173485, 37.23908715
103	Wood Pole	-122.0216718, 37.23861472
104	Wood Pole	-122.02195424, 37.23809473
105	Wood Pole	-122.02190817, 37.23780611
106	Wood Pole	-122.02191348, 37.23739717
107	Wood Pole	-122.02208935, 37.23723561
108	Wood Pole	-122.04360017, 37.2590435
109	Wood Pole	-122.04386975, 37.25921378
110	Wood Pole	-122.04435207, 37.25969549
111	Wood Pole	-122.04462009, 37.26012964
112	Wood Pole	-122.04486411, 37.26060642
113	Wood Pole	-122.04528272, 37.26030779
114	Wood Pole	-122.06987456, 37.32091792
115	Wood Pole	-122.06987463, 37.3205416
116	Wood Pole	-122.06985872, 37.32022177
117	Wood Pole	-122.06966855, 37.31979571
118	Wood Pole	-122.0699053, 37.31982167
119	Wood Pole	-121.95875462, 37.28643011

120	Wood Pole	-121.95860534, 37.28602203
121	Wood Pole	-121.95852555, 37.28564654
122	Wood Pole	-121.95846549, 37.28525583
123	Wood Pole	-121.95827164, 37.28490411
124	Pedestal	-121.95854724, 37.28535413
125	Pedestal	-121.95867981, 37.28580677
126	Pedestal	-121.88709027, 37.23016942
127	Pedestal	-121.8866321, 37.23016321
128	Pedestal	-121.88682028, 37.23064018
129	Pedestal	-121.88627728, 37.2308649
130	Pedestal	-121.88613703, 37.23146033
131	Pedestal	-121.88616111, 37.23194257
132	Pedestal	-121.88617533, 37.23178585
133	Underground Vault	-121.88666775, 37.22982724
134	Pedestal	-121.88663126, 37.22940255
135	Pedestal	-121.88674101, 37.22948311
136	Pedestal	-121.8868879, 37.2294788
137	Pedestal	-121.78513623, 37.29755876
138	Pedestal	-121.78450248, 37.29720575
139	Pedestal	-121.7860381, 37.29818262
140	Pedestal	-121.78705611, 37.29867367
141	Underground Vault	-121.78704197, 37.29884332
142	Pedestal	-121.7867097, 37.29890956
143	Pedestal	-121.7858772, 37.29899961
144	Pedestal	-121.78513396, 37.29888833
145	Wood Pole	-121.81946062, 37.33886271
146	Wood Pole	-121.81960766, 37.33873894
147	Wood Pole	-121.81973841, 37.33865463
148	Wood Pole	-121.81885505, 37.33834012
149	Wood Pole	-121.81831301, 37.33786304
150	Wood Pole	-121.81800213, 37.33755832
151	Pedestal	-121.89663364, 37.44261741
152	Pedestal	-121.89698245, 37.44252993
153	Pedestal	-121.89739618, 37.44282585
154	Pedestal	-121.8973246, 37.44290357
155	Pedestal	-121.8971973, 37.44286787
156	Pedestal	-121.89734554, 37.44252235
157	Pedestal	-121.89753784, 37.44249279
158	Pedestal	-121.89793498, 37.4424251
159	Pedestal	-121.89828748, 37.44237753
160	Pedestal	-121.89847252, 37.44233341

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 3:

Table 3: GO 95, Rule 12.2 Finding

Location	Finding
81	Equipment located on pole with extensive woodpecker damage.

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 4:

Table 4: GO 95, Rule 31.1 Finding

Location	Finding
46	Cable has separated from its messenger cable.

3. **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 related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 31.6 Findings

Location	Findings
11	Abandoned cable hanging at midspan.
42	Abandoned service line.
46	Abandoned service drop on tree.
110	Abandoned line hanging in tree.

4. **GO 95, Rule 35, Vegetation Management s**tates 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 related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 35 Findings

Location	Findings
45	Messenger cable rubbing vegetation.
46	Vegetation pushing on span.

5. **GO 95, Rule 38, Minimum Clearance of Wires from Other Wires** states in part:

"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.

Table 2, Case 3C: The clearance between wires, cables and conductors not supported on the same poles, vertically at crossings in spans and radially where colinear or approaching crossings for communication conductors (including open wire, cables and service drops) must be at least 24 inches.

Table 2, Case 8C: Vertical separation between conductors and/or cables, on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole and in adjoining midspans for communication conductors (including open wire, cables and service drops) must be at least 12 inches.

EXCEPTION: Can be less than 12" for strand mounted terminals, splice cases and other equipment located 8" or more from the centerline of the pole, but not less than 1" with mutual agreement between affected owners."

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

Table 7: GO 95, Rule 38 Findings

Location	Findings
7	Contact between Comcast and AT&T service drop.
8	Contact between Comcast and AT&T at two points.
9	Comcast service drop is taped to another service drop.
78	Service drops have been tied together. This was resolved on site.
110	Comcast line touching AT&T line.

Location	Findings
115	Two different Comcast drops are contacting AT&T drops.
123	Service drops touching telecom lines.
145	Comcast line contacting other cable.

6. **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 8:

Table 8: GO 95, Rule 84.6-B Findings

Location	Findings
23	There is an exposed ground rod.
40	Exposed ground wire.
122	Exposed ground wire.

7. **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 9:

Table 9: GO 95, Rule 37 Findings

Location	Findings
5	Cable within minimum clearance from streetlight.
22	Cable has 17' 7" ground clearance.
62	Service drop has low clearance going to customer.

8. **GO 95, Rule 86.2, Guys, Use** states in part:

"Where mechanical loads imposed on poles, towers or structures are greater than can be supported with the safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.

Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire stress, the pole below the point of guy attachment acting merely as a strut.

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."

ESRB's finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 86.2 Finding

Location	Finding
83	Span guy is not taught.

9. **GO 95, Rule 86.7-B, Location of Sectionalizing Insulators, Anchor Guys** states in part:

"In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule 86.7–B."

ESRB's findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 86.7-B Findings

Location	Findings
43	Vegetation contact above down guy insulator.
103	Vegetation touching anchor guys above insulator.
107	Vegetation touching anchor guy above insulator.

10. 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 12:

Table 12: GO 95, Rule 87.7-D(1) Findings

Location	Findings
6	Loose cable riser needs to be covered.
44	Missing riser cover.
47	Missing riser cover.
65	Missing riser cover.
82	Riser needs to be covered to 8 feet above ground.
115	Missing riser cover.
118	Missing riser cover.

11. 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 13:

Table 13: GO 128, Rule 17.1 Findings

Location	Findings
16	Loose ground wire. Reattached on site.
18	Loose ground wire. Fixed on site.
86	Animal nest in the pedestal.
99	Ground wire not clamped. Resolved onsite.
124	Coax cable sticking out of enclosure.

12. 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 14:

Table 14: GO 128, Rule 32.7 Findings

Location	Findings
94	Unsecure pedestal. Bottom is corroded.
126	Lid not secured.

IV. 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 15. While in the field, Comcast created and sent third-party notifications to the respective utilities for the items below:

Table 15: Third-Party Observations

Location	Entity	Observations
3	AT&T	AT&T cable is run to Comcast level.
5	AT&T	Abandoned drop.
6	AT&T	Loose cable riser needs to be covered.
7	Unknown	Exposed ground wire.
7	AT&T	Low service drop.
7	AT&T	AT&T service drop runs up pole above Comcast level.
7	AT&T	AT&T service drop is contacting Pacific Gas & Electric (PG&E) service drop.
9	AT&T	AT&T line going up to Comcast level.

Location	Entity	Observations
19	AT&T	Exposed ground wire and rod.
21	AT&T	Abandoned cable.
22	AT&T	Ground clearance is too low at 15’ 10”.
36	Unknown	Vegetation obstructing climbing space.
39	Unknown	Vegetation obstructing climbing space up to secondary lines.
41	AT&T	Cable is hanging due to broken lashing wire.
42	PG&E	Dropped span guy going to Comcast power box.
42	Unknown	Vegetation blocking climbing space.
44	AT&T	Missing riser cover.
45	Unknown	Top branches are pressing on communications lines. The branches are trimmed and not connected to trunk but are left in place.
46	Unknown	Abandoned equipment.
63	AT&T	Missing riser cover.
64	PG&E	Vines growing on anchor guys above insulator.
83	AT&T	Abandoned cable.
95	PG&E	Pole splitting at top with woodpecker damage
96	PG&E	Possible issue with pole top cracked at top plate and bolt.
103	AT&T	Missing riser cover.
107	PG&E	Vegetation touching anchor guy above insulator.
109	AT&T	Phone riser not covered. The riser was placed in Comcast riser on site.
113	AT&T	AT&T riser not covered.
115	AT&T	Missing riser cover.
117	AT&T	Abandoned cable.
118	PG&E	Loose anchor guy and tree is touching the guy above the insulator.
119	Unknown	Riser cover loose.

Location	Entity	Observations
121	AT&T	Missing riser cover.
149	AT&T	Riser cover not secured to pole.
150	Unknown	Riser cover not secured to pole.
157	PG&E	Open transformer vault.