STATE OF CALIFORNIA GAVIN C. NEWSOM., *Governor*

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

January 24, 2025 CA2024-1248

Patti Ringo
Regulatory & Government Affairs
2260 Apollo Way
Santa Rosa, CA 95407

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Sonic Sonoma County Service Areas

Ms. Ringo:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Thomas Roberts and Samuel Mandell of ESRB staff conducted a CIP audit of Sonic's Sonoma County Service Areas from September 3 to 6, 2024. During the audit, ESRB staff conducted field inspections of Sonic'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 are enclosed.

Please provide a response no later than February 24, 2025, via electronic copy, of all corrective actions and preventive measures taken by Sonic to correct the identified 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 Thomas Roberts at (415) 971-3907 or thomas.roberts@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 Sonic's Sonoma County Service Areas

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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CPUC AUDIT FINDINGS OF
SONIC SONOMA COUNTY SERVICE AREAS
SEPTEMBER 3-6, 2024

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records obtained through Sonic's response to ESRB's data requests:

- Statistics on the facilities subject to GO 95 and GO 128,
- Service maps for Sonic equipment in Sonoma, Marin, and Solano Counties, including Graphical Information System (GIS) data,
- GO 95 and GO 128 maintenance/inspection program documents,
- A list of GO 95 and GO 128 inspection records,
- A work order list containing data on facility locations, identified deficiencies, and work completion dates from July 2019 through July 2024,
- Safety Hazard Notifications Sonic sent to Third Party Utilities from July 2019 through July 2024.
- Safety Hazard Notifications Sonic received from Third Party Utilities July 2019 through July 2024.
- A sample of pole loading calculations as requested by ESRB,
- Intrusive pole test and treat inspection records from July 2019 through July 2024,
- New construction projects completed from July 2019 through July 2024.

II. Records Violations

ESRB found violations of multiple GO 95 and GO 128 rules based on its review of documents provided during the audit. Each of the following sections provides excerpts of the applicable rule(s) followed by an explanation of the violations.

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

ESRB requested information on Sonic's inspector training program, and the qualifications of inspectors to perform inspections in compliance with GO 95. None of the documentation provided by Sonic addressed training requirements or inspector qualifications, and therefore Sonic is in violation of this requirement to document inspector qualifications.

2. **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.

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.

This section of Rule 18-B includes two interrelated requirements: 1) the company must have an *auditable* maintenance program, and 2) it defines the minimum requirements for such a program to be deemed *auditable*. ESRB requested Sonic documentation of its maintenance and inspection (M&I) policies, procedures, and programs, as well as records of Sonic's inspections and maintenance work orders. ESRB's review of this information revealed the following:[1]

- Sonics program documents do not refer to GO 95 Rule 18-B or define the minimum required data to be collected,
- Sonics program documents do not include a timeline for corrective actions,[2]
- Sonic's inspection records do not include an accurate inspection date, and have other anomalies that limit auditability,[3]
- Sonic's maintenance work order records do not include an accurate inspection date, and have other anomalies that limit auditability,[4]

Based on these findings, Sonic is in violation of the minimum requirements for an auditable maintenance program.

3. **GO 95, Rule 18-B(1), Maintenance Programs** states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.

Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate:

- *Type of facility or equipment;*
- *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
- *Accessibility;*
- *Climate;*

[1] Sonic asserted that its inspection subcontractor had additional documentation, but that these documents were not provided to ESRB due to assertions of confidentiality. ESRB's review and findings throughout this report are based exclusively on the documentation provided by Sonic to ESRB.
[2] Refer to Section 3 below.
[3] The records provided by Sonic include dates for "created," "updated," and "due," but none of these dates appear to be the actual date of the inspection as discussed in Section 4 below.
[4] The records provided by Sonic include dates for "Creation" and "Completed." but Refer to Section 5 below.

- *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*

(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 […]*

Documentation provided by Sonic regarding M&I policies, procedures, and programs did not reference this rule, the priority levels and corresponding timeline for corrective actions, or the factors to be used to schedule corrective actions within each priority level. Sonic's inspection records include a field titled "Priority," but all records indicate "Medium," and have a due date that is not consistent with the GO 95 priority levels. Sonic's maintenance work order data includes creation and completion dates, but not priority levels or due dates. For these reasons, Sonic is in violation of the requirements for the timing of corrective actions.[5]

4. Inspection of Overhead Facilities

GO 95 includes multiple rules that define requirements for the inspection of overhead facilities. Excerpts from the applicable rules are provided, followed by an explanation of how documents provided by Sonic demonstrate violations of these requirements.

GO 95, Rule 31.2, Inspection of Lines states in part:

> *Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*[6]

[5] This is also a minimum requirement for having an auditable M&I program per Section 2 above.
[6] This rule refers to Rule 80.1 for additional details regarding communications lines.

GO 95, Rule 80.1.A(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District states in part:

> *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.*

GO 95, Rule 80.1.A(2), Statewide Inspection Requirements states in part:

> *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'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.*

ESRB's review of M&I program documents for Sonic and its subcontractor revealed the following regarding inspections:

- The methodology used to ensure that all communication lines are subject to the required inspections is not provided,
- The problems to be identified through detailed inspections is not provided,
- Sonic's 10/20 year inspection cycle for non-High Fire Threat District (HFTD) areas only addresses one of the five factors required per Rule 80.1.A(2), the location relative to designated HFTD. Without addressing the remaining four factors, Sonic's 10 year patrol/20 year detailed inspection cycles cannot meet the "frequently" requirement of Rule 31.2,
- The documents supplied by Sonic provide insufficient detail to support that Sonic's detailed inspection program meets the "thoroughly" requirement of Rule 31.2.[7]

[7] Subcontractor documents addressing patrols, including a checklist, are sufficient to meet the "thoroughly" requirement, but they do not address the "frequently" requirement.

Sonic's August 19, 2024 response to ESRB's pre-audit data request stated that its overhead facilities had just reached the required inspection cadence and that initial inspections were in process. Sonic's response also included a spreadsheet with inspection records per ESRB's request for inspections performed between July 2019 and July 2024. This file included 21 records, including records for five patrols in Tier 2 HFTDs and 16 detailed inspections in Tier 3 HFTDs. This data has the following shortcomings:

- All records were created on August 12, 2024, which is after the requested time period, and indicates that no inspections were performed between July 2019 and August 12, 2024, even though GO 95 requires patrols every year in Tier 3 HFTDs and every two years for Tier 2 HFTDs. Much of Sonoma County is designated as HFTD Tier 2 or 3. While Sonic's facilities identified for this audit are primarily located in non-HFTD urban areas, Sonic did not demonstrate that this was the reason no inspections were recorded prior to August 2024.
- All records were created within a 20 minute period, which indicates these are not the actual inspection dates and times. There is no other data field that provides the actual inspection date.
- Each record has the same due date, even for issues that have not been resolved: "8/15/2024 0:00,"
- Each inspection record describes an issue at the pole location, e.g. loose lashing wire.[8] This suggests that Sonic is either performing Ad Hoc/responsive inspections, or that they are not recording inspections that do not result in corrective action, neither of which is consistent with these requirements.

Based on these findings, Sonic is in violation with the above GO 95 inspection requirements. ESRB also found that much of the information in Sonic's inspection records group multiple types of data into data fields such as those titled Summary, Comments, and Description.[9] While this was not a significant impediment to the current audit since Sonic only provided records for 21 inspections, providing one type of data per field going forward will help ensure that Sonic's inspection program is auditable, whether internally or in the future by ESRB.

5. Maintenance of Overhead Facilities

GO 95 includes multiple rules that define requirements for the maintenance of overhead facilities. Excerpts from the applicable rules are provided, followed by an explanation of how documents provided by Sonic demonstrate violations of these requirements.

GO 95, Rule 18-A(1), Resolution of Potential Violations of General Order 95 and Safety Hazards states:

> *Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.*

[8] Two locations indicate "Sonic not attached."

[9] Inspection type, equipment ID, HFTD tier, and a long-string code are in the Summary field; equipment description and finding are in the Description field; and dates, times, codes, some equipment IDs, and job status or additional work requirements are in multiple Comment fields.

Upon completion of the corrective action, the company's records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.

GO 95, Rule 18-B, Maintenance 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.

GO 95, Rule 22.2, Maintenance states in part:

Maintenance means the work done on any line or any element of any line for the purpose of extending its life […]

Sections 1-4 above focus on one component of a company's M&I program: inspections. The rule excerpts above address the other component: the maintenance activities and corrective actions triggered by inspections. Program documentation provided by Sonic does not address the maintenance of overhead equipment, and therefore violates the requirement to implement an auditable maintenance program.[10]

ESRB also requested a list of work orders for maintenance activities, and in response Sonic provided over 2,400 records of repairs performed between July 2019 and July 2024. These records do not identify the persons performing the work, and therefore violate the requirements of Rule 18-A(1).

ESRB's review of these work order records noted additional issues:

- There is no data to tie these maintenance activities to inspection work,[11]
- Data for all Sonic locations in California was provided rather just the audit region as requested. This is because there is no field for city, county, zip code etc. and because many records lack the city or zip code in the address field,
- There is no data field for equipment or asset ID,
- There is no data on priority, status, or due date to correct maintenance issues,
- There is no data field for corrective action taken.[12]

These issues do not constitute any additional violations since this data is not specifically required by GO 95. However, as discussed in Section 2 above, the lack of complete and consistent data supports that Sonic does not meet the requirement to have an auditable maintenance program.

6. GO 95, Rule 44.2, Additional Construction states:

[10] Documentation includes "Sonic Telecom GO95 Rule 80.1 Maintenance and Inspection Program" which suggests that Sonic is aware of the need for maintenance even if the document does not refer to rules other than 80.1. Additional documentation from Sonic's subcontractor does not address maintenance, only inspections.
[11] Each record includes a "Workflow ID" number. It is possible that Sonic has information that ties these IDs to inspections, but Sonic did not provide such information, nor did ESRB specifically request it.
[12] For some records, the Issue Description field described the work performed to correct the issue.

Any entity planning the addition of facilities shall ensure that the addition of the facilities will not reduce the safety factors below the values specified by Rule 44.3.

If performed, the entity responsible for performing loading calculations for additional construction shall maintain these loading calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.

Any loading calculations performed for wood structures more than 15 years old shall incorporate the results of intrusive inspections performed within the previous five years.

Sonic owns only 2 poles in the subject service areas, but explained that it performs intrusive tests (IT) regularly when it seeks attachment to poles that have not been tested in the previous five years.[13] Sonic provided a spreadsheet with 10,192 records of intrusive tests performed in the 2019-2024 time period requested. This data set lacks consistent location information such as the city or zip code, so it is not clear if this data includes data for the subject audit regions only, or all Sonic installations statewide. In addition, the data provided for each record is not consistent, and critical information is missing from many records, as indicated by the number of blanks in many data fields:

- Inspection Results, 1 blank,
- Inspection Type, 6 blanks,
- Inspection Date, 203 blanks,
- Inspector name, 5,121 blanks,
- Pole ID, 8,494 blanks.

ESRB finds that Sonic is in violation of Rule 44.2 because inconsistent and incomplete recordkeeping prevents a determination that it has complied. At a minimum, the data provided by Sonic indicates a lack of consistent IT documentation and record keeping. Additionally, while ESRB did not perform extensive analysis of the IT data because of the above issues, one example suggests potential problems with the data: on July 6, 2022, one inspector reviewed 224 poles between 1AM and 10AM, for an average pace of 2.4 minutes per pole. The quality of inspections and accurate documentation is suspect if performed at this sustained pace. ESRB understands the contractors provide all IT services for Sonic, but that does not free Sonic from the responsibility for accurate and thorough performance and documentation of required intrusive tests.

7. Maintenance and Inspection of Underground Facilities

GO 128 includes multiple rules that define requirements for the maintenance and inspection of underground facilities. Excerpts from the applicable rules are provided, followed by an explanation of how documents provided by Sonic demonstrate violations of these requirements.

GO 128, Rule 12.2, Maintenance states:

Systems shall be maintained in such condition as to secure safety

[13] Per Sonic comment during the September 3, 2024 Kick-off Meeting.

to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.

GO 128, Rule 12.3.A, Rules Applicable December 12, 1967 states:

The following rules were made applicable to all systems on December 12, 1967. (1) Rule 12.2.

GO 128, Rule 12.3.B, Rules Applicable April 13, 1970 states in part:

The following rules were made applicable to all systems on April 13, 1970. (1) Rule 17.2.

GO 128, Rule 17, Requirements for All Supply and Communication Systems states:

The following rules apply to all supply and communication underground systems under all conditions.

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.

GO 128, Rule 17.2, Inspection of Lines states:

Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules. (See Rule 12.3).

GO 128, Rule 22.3.B, Maintenance states:

Maintenance means the work done on any facility or element for the purpose of preserving its efficiency or physical condition in service.

In response to ESRB's request for M&I program documentation, Sonic provided a document that included approximately one-half page regarding "GO128 Underground Inspections."[14] ESRB noted the following regarding this document:

- Sonic performs underground work internally, so there should be no other subcontractor documents to provide additional details,
- The program focuses on external inspection of vaults, but does not mention cables, ducts, splices, ground rods, or other underground equipment,

[14] "Sonic Telecom GO95 Rule 80.1 Maintenance and Inspection Program."

- The frequency of inspections is 20 years, and the document does not differentiate between patrols and detailed inspections,
- Two specific inspection issues are identified, and corrective actions are described for each, but the timing of corrective actions is not provided.

ESRB finds that Sonic's M&I program for underground equipment violates both the "frequently" and "thoroughly" requirements of Rule 17.2. While GO 128 does not include objective requirements to support this finding, ESRB is not aware of any logical or legal means of determining that a 20 year inspection cycle is "frequent." In addition, Sonics document addresses only one component of its underground system, vaults, so the defined M&I program cannot be deemed to be "thorough."

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Table 1: Field Inspection Locations

Location #	Structure Type	Approximate Coordinates	City
1	Pole	(38.4223293, -122.7179438)	Santa Rosa
2	Pole	(38.4223745, -122.7185810)	Santa Rosa
3	Pole	(38.4223477, -122.7190192)	Santa Rosa
4	Pole	(38.4224304, -122.7193507)	Santa Rosa
5	Pole	(38.4222355, -122.7198542)	Santa Rosa
6	Pole	(38.4183497, -122.7190730)	Santa Rosa
7	Pole	(38.4186553, -122.7195934)	Santa Rosa
8	Pole	(38.4186459, -122.7200258)	Santa Rosa
9	Pole	(38.4186001, -122.7204757)	Santa Rosa
10	Pole	(38.4181633, -122.7204810)	Santa Rosa
11	Pole	(38.4178348, -122.7437783)	Santa Rosa
12	Hand Hole	(38.4178348, -122.7437783)	Santa Rosa
13	Pole	(38.6294172, -122.8692802)	Healdsburg
14	Pole	(38.6294486, -122.8697513)	Healdsburg
15	Pole	(38.6294428, -122.8702150)	Healdsburg
16	Pole	(38.6294441, -122.8707192)	Healdsburg
17	Hand Hole	(38.6336311, -122.8736818)	Healdsburg
18	Pole	(38.6142013, -122.8700011)	Healdsburg
19	Pole	(38.6141745, -122.8698348)	Healdsburg
20	Pole	(38.6141683, -122.8693885)	Healdsburg
21	Pole	(38.6141473, -122.8690569)	Healdsburg
22	Pole	(38.6143550, -122.8684480)	Healdsburg
23	Pole	(38.6141641, -122.8635182)	Healdsburg

Location #	Structure Type	Approximate Coordinates	City
24	Pole	(38.6141460, -122.8633415)	Healdsburg
25	Pole	(38.6141355, -122.8628201)	Healdsburg
26	Pole	(38.6141408, -122.8622378)	Healdsburg
27	Pole	(38.6020376, -122.8607025)	Healdsburg
28	Pole	(38.6027589, -122.8608618)	Healdsburg
29	Pole	(38.6032555, -122.8609490)	Healdsburg
30	Pole	(38.5658373, -122.8307520)	Windsor
31	Pole	(38.5654690, -122.8301076)	Windsor
32	Pole	(38.5650907, -122.8294266)	Windsor
33	Pole	(38.5650254, -122.8292942)	Windsor
34	Vault	(38.5239760, -122.7914217)	Windsor
35	Pole	(38.5237796, -122.7932705)	Windsor
36	Pole	(38.5229898, -122.7932591)	Windsor
37	Pedestal	(38.5146807, -122.7886058)	Windsor
38	Pole	(38.4597202, -122.7141919)	Santa Rosa
39	Pole	(38.4601148, -122.7141953)	Santa Rosa
40	Pole	(38.4605787, -122.7142130)	Santa Rosa
41	Pole	(38.4609759, -122.7142382)	Santa Rosa
42	Pole	(38.4615359, -122.7142767)	Santa Rosa
43	Pole	(38.4520824, -122.7051455)	Santa Rosa
44	Pole	(38.4520981, -122.7044588)	Santa Rosa
45	Pole	(38.4520223, -122.7051948)	Santa Rosa
46	Pole	(38.4516032, -122.7051931)	Santa Rosa
47	Pole	(38.4525186, -122.6980701)	Santa Rosa
48	Pole	(38.4452974, -122.7062328)	Santa Rosa
49	Pole	(38.4452562, -122.7063039)	Santa Rosa
50	Pole	(38.4452964, -122.7067384)	Santa Rosa
51	Pole	(38.4452887, -122.7073694)	Santa Rosa
52	Hand Hole	(38.4462359, -122.8614733)	Sebastopol
53	Pole	(38.4462359, -122.8614733)	Sebastopol
54	Pole	(38.4466833, -122.8613298)	Sebastopol
55	Pole	(38.4469774, -122.8613268)	Sebastopol
56	Pole	(38.4473288, -122.8613007)	Sebastopol
57	Pole	(38.4028713, -122.8293525)	Sebastopol
58	Pole	(38.4031622, -122.8295363)	Sebastopol
59	Pole	(38.4034331, -122.8297515)	Sebastopol
60	Pole	(38.4037502, -122.8299671)	Sebastopol
61	Pole	(38.4040944, -122.8302122)	Sebastopol
62	Pole	(38.3976407, -122.8275649)	Sebastopol

Location #	Structure Type	Approximate Coordinates	City
63	Pole	(38.3976463, -122.8270540)	Sebastopol
64	Pole	(38.3975351, -122.8267193)	Sebastopol
65	Pole	(38.3981221, -122.8265966)	Sebastopol
66	Pole	(38.3884629, -122.8193566)	Sebastopol
67	Pole	(38.3883136, -122.8200154)	Sebastopol
68	Pole	(38.3882679, -122.8206823)	Sebastopol
69	Pole	(38.3920024, -122.8208446)	Sebastopol
70	Pole	(38.3924015, -122.8209004)	Sebastopol
71	Pole	(38.3928667, -122.8208251)	Sebastopol
72	Pole	(38.3932887, -122.8208087)	Sebastopol
73	Pole	(38.3934920, -122.8208611)	Sebastopol
74	Pole	(38.4018038, -122.7364475)	Santa Rosa
75	Pole	(38.4017975, -122.7359225)	Santa Rosa
76	Pole	(38.4018813, -122.7352674)	Santa Rosa
77	Pole	(38.4018602, -122.7345134)	Santa Rosa
78	Pole	(38.3871162, -122.7229651)	Santa Rosa
79	Hand Hole	(38.3871162, -122.7229651)	Santa Rosa
80	Pole	(38.3863776, -122.7228908)	Santa Rosa
81	Pole	(38.4288877, -122.7067190)	Santa Rosa
82	Pole	(38.4288002, -122.7071085)	Santa Rosa
83	Pole	(38.4286910, -122.7073791)	Santa Rosa
84	Pole	(38.4283795, -122.7076289)	Santa Rosa
85	Pole	(38.4353633, -122.6763942)	Santa Rosa
86	Pole	(38.4357874, -122.6759594)	Santa Rosa
87	Pole	(38.4354733, -122.6756841)	Santa Rosa
88	Pole	(38.4452232, -122.6703510)	Santa Rosa
89	Pole	(38.4446504, -122.6701349)	Santa Rosa
90	Pole	(38.4444340, -122.6699411)	Santa Rosa
91	Pole	(38.4710115, -122.6790788)	Santa Rosa
92	Pole	(38.4713604, -122.6788500)	Santa Rosa
93	Hand Hole	(38.3575337, -122.7111475)	Rohnert Park
94	Hand Hole	(38.3574635, -122.7104221)	Rohnert Park
95	Hand Hole	(38.3572003, -122.7096948)	Rohnert Park
96	Pole	(38.2471661, -122.6330621)	Petaluma
97	Pole	(38.2473343, -122.6333233)	Petaluma
98	Pole	(38.2475229, -122.6336579)	Petaluma
99	Pole	(38.2455180, -122.6175824)	Petaluma
100	Pole	(38.2457173, -122.6179153)	Petaluma
101	Pole	(38.2459114, -122.6182637)	Petaluma

Location #	Structure Type	Approximate Coordinates	City
102	Pole	(38.2459114, -122.6182637)	Petaluma
103	Hand Hole	(38.2431121, -122.6125496)	Petaluma
104	Hand Hole	(38.2431579, -122.6123142)	Petaluma
105	Hand Hole	(38.2433751, -122.6122938)	Petaluma
106	Hand Hole	(38.2433261, -122.6121630)	Petaluma
107	Pole	(38.2307472, -122.6343036)	Petaluma
108	Pole	(38.2305586, -122.6338178)	Petaluma
109	Pole	(38.2304675, -122.6334886)	Petaluma
110	Pole	(38.2281983, -122.6433095)	Petaluma
111	Pole	(38.2281891, -122.6435023)	Petaluma
112	Pole	(38.2284143, -122.6441349)	Petaluma
113	Pole	(38.2390552, -122.6500660)	Petaluma
114	Pole	(38.2388408, -122.6505907)	Petaluma
115	Pole	(38.2385101, -122.6507453)	Petaluma
116	Pole	(38.2381027, -122.6509139)	Petaluma

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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 2:

Table 2: GO 128, Rule 17.1 Findings

Location	Findings
12	Handhole filled with dirt.

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

Table 3: GO 128, Rule 17.8 Findings

Location	Findings
37	Pedestal did not have a Sonic label.
103	Handhole labeled "Irrigation" rather than Sonic.
104	Handhole labeled "Irrigation" rather than Sonic.
105	Handhole labeled "Irrigation" rather than Sonic.
106	Handhole labeled "Irrigation" rather than Sonic.

3. **GO 128, Rule 42.7, Covers** states:

   Manholes and handholes, 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 arrangement 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, Figure 9).

   ESRB's findings related to the above rule are listed in Table 4:

Table 4: GO 128, Rule 42.7 Findings

Location	Findings
103	Handhole cover is lightweight and easy to remove without tool.
104	Handhole cover is lightweight and easy to remove without tool.
105	Handhole cover is lightweight and easy to remove without tool.
106	Handhole cover is lightweight and easy to remove without tool.

4. **GO 95, Rule 31.6, Abandoned Lines** states**:**

Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.

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

Table 5: GO 95, Rule 31.6 Findings

Location	Findings
28	Abandoned Sonic service drop.
90	Abandoned Sonic service drop.

5. **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
74	Sonic cable was in contact with a tree and showed signs of abrasion.

6. **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.

Table 2, Case 16C: Radial separation of conductors on same crossarm, pole or structure—incidental pole wiring for conductors, taps or lead wires of different circuits must be at least 3 inches.

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

Table 7: GO 95, Rule 38 Findings

Location	Findings
29	Sonic service drop is not supported and is in contact with an AT&T cable.
43	Sonic service drop is loose and too close to the AT&T service drop.
62	Sonic cable is on top of and contacting AT&T cable.
66	Sonic service drop is resting on AT&T cable.

7. **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
49	Ground wire for Sonic equipment is exposed.
58	Ground wire for Sonic equipment is exposed.

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

Table 9: GO 95, Rule 86.2 Findings

Location	Findings
53	Slack guy wires supporting Sonic equipment.
88	Slack guy wires supporting Sonic equipment.
90	Slack guy wires supporting Sonic equipment.
99	Slack guy wires supporting Sonic equipment.
102	Slack guy wires supporting Sonic equipment.

9. GO 95, Rule 87.7, Covering or Guarding states in part:

A. Vertical and Lateral Cables
See Rules 84.6–C, D and E for covering or protection of vertical and lateral cables cables attached to the surface of poles, crossarms or structures.

D. (1) Risers, Covered from Ground Level to 8 Feet above the Ground:
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

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.

Vertical runs shall be treated as risers (see Rule 87.7–D) where within a distance of 8 feet from the ground line.

ESRB's findings related to the above rules are listed in Table 10:

Table 10: GO 95, Rules 84.6-D and 87.7 Findings

Location	Findings
11	Sonic service drop needs to be secured at regular intervals running down pole into riser cover.
35	Sonic service drop is loose and uncovered.
69	Missing riser guard.

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 11 includes all non-Sonic (third party) findings that ESRB observed during the audit. Sonic must create outgoing third-party notifications to the respective companies for the following observations:

Table 11: Third Party Observations

Location #	Findings
3	AT&T: low service drop at 13' 1".
5	PG&E: broken ground wire cover; AT&T: cables are touching Comcast cables.
7	Comcast: ground wire protruding from cover and exposed.
8	PG&E: broken ground wire cover.
10	PG&E: slack down guy wire.

Location #	Findings
14	AT&T and Comcast: abandoned service drops.
16	Healdsburg MUD: low rung on pole.
20	AT&T and Comcast: abandoned service drops.
23	AT&T: bond wire missing; Comcast: missing riser cover.
26	AT&T and Comcast: abandoned service drops.
28	AT&T: riser cover loose and not covering cable; Comcast: broken riser cover.
40	Comcast: unsecured ground; ground rod and attachment above grade.
42	PG&E: pole is split at the top; Comcast: exposed ground wire.
44	PG&E: pole is weathered and decayed; AT&T: exposed ground rod.
45	AT&T: low service drop.
46	PG&E: slack down guy wire.
47	AT&T: low cable span above house; exposed ground wire; unsecured cabinet.
49	PG&E: bent pole; down guy too close to secondaries; AT&T: exposed ground wire and ground rod.
50	PG&E: slack down guy wire; AT&T and Comcast: slack down guys and loose ground wire covers.
53	Comcast: messenger wire embedded in tree branches.
57	AT&T: low service drop.
58	AT&T and Comcast: broken ground wire cover.
61	AT&T: riser cover not 8’.
62	AT&T: riser cable not secured.
65	PG&E: down guy wire too close to cross arm.
66	PG&E: Large woodpecker hole about 8’ above grade.
67	PG&E: service drop is resting on AT&T Drop; AT&T: broken cable lashing is tying up Comcast and Sonic drops.
69	AT&T: service drops run along pole but are not secured or covered.
72	Comcast: ground wire cover broken.
73	AT&T: temporary ground wire cover is not adequately secured.

Location #	Findings
74	Comcast: cable in contact with tree and abraded.
75	AT&T: cable low and contacting tree.
76	Comcast: cable coil contacting AT&T cable and the “preform” holding the coil is contacting Sonic cable.
82	AT&T and Comcast: cables running down pole are not adequately secured; Comcast: ground wire exposed.
84	Comcast: ground wire and cover cut and missing from grade to approximately 6’ high.
85	PG&E: pole has been moved but hole for prior location has not been filed.
86	AT&T: exposed ground wire.
87	AT&T: slack down guy; exposed ground wire; ground wire cover not adequately secured.
88	AT&T and Comcast: slack down guys; low cables between this location and location 89; AT&T service drop in contact with Sonic guy wire.
89	PG&E: split in cross arm causing insulators to tilt.
90	PG&E: split in cross arm causing insulators to tilt; AT&T: Abandoned service drop; slack down guys for all companies on the pole.
91	AT&T: riser cover not covering all cables.
98	Comcast: low service drop.
99	Comcast and AT&T: slack down guy wires.
100	PG&E: down guys for primary and secondary are slack.
102	Comcast and AT&T: slack down guy wires.
107	AT&T: abandoned service drop.
109	PG&E: broken ground wire cover; AT&T: service drop supported by fabric/mule tape, not wire.