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

December 23, 2024

CA2024-1267

Ross Johnson
Area Manager Regulatory Relations
AT&T North, 430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Contra Costa and Alameda Counties

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Matthew Yunge and Nora Nguyen of ESRB staff conducted a communication audit of AT&T Contra Costa and Alameda Counties from October 7, 2024 through October 11, 2024. During the audit, ESRB staff conducted field inspections of AT&T's communication facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than January 24, 2025, by electronic copy of all corrective actions and preventive measures taken by AT&T to correct the identified violations and prevent the recurrence of such violations.

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 Communication Audit Report for AT&T Contra Costa and Alameda County Region

Cc:

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AT&T CONTRA COSTA AND ALAMEDA COUNTY REGION
COMMUNICATIONS AUDIT FINDINGS
October 7 – October 11, 2024

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for AT&T's Contra Costa and Alameda County Region:

- Facility statistics as of October 2023, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Facility map of the Audit Area.
- AT&T Overhead Lines Maintenance Plan, GO 95 Rule 18, Version 5.5, August 30, 2024.
- Employee statistics and employee training records.
- Inspection and patrol records containing data for the inspected facility type, facility location, fire threat district location, inspection date from August 2019 to July 2024.
- AT&T Visual Inspection of Overhead Line, GO 95 Rule 80.1A, April 18, 2023.
- Records of OH and UG corrective actions completed from August 2019 to July 2024.
- Records for intrusive pole inspections conducted from August 2019 to July 2024.
- Records for all outgoing Safety Hazard notifications, from August 2019 to July 2024.
- Records for all incoming Safety Hazard notifications, from August 2019 to July 2024.
- A list of all pole safety factor calculations completed from August 2019 to July 2024.
- A list of all new OH and UG construction projects completed from September 01, 2023 to August 01, 2024.

II. Records Violations

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

1. **General Order (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."*

AT&T patrols its overhead assets in 20-year intervals in Fire-Threat Tier 1 locations. However, GO 95, Rule 31.2 requires frequent and thorough inspections of overhead lines. While GO 95 does not provide a specific time frame, ESRB does not consider once every 20 years to be frequent.

2. **GO 128, Rule 17.2, Inspection** states in part:

> *"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."*

AT&T provided no procedures to ensure underground assets are inspected thoroughly and completely as required by GO 128. AT&T has repeatedly stated in response to past ESRB Audit Reports that AT&T has inspection procedures for conducting inspections of underground assets but has failed to provide those procedures.

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

> *"In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals… shall not exceed the time specified in the following Table."*

Inspection	Tier 2	Tier 3
Patrol	2 years	1 year
Detailed	10 years	5 years

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 reviewed AT&T's Contra Costa and Alameda County Region patrol and detailed inspection records from August 2019 to July 2024 for the interval between inspections and the period since the last inspection. ESRB found a total of 145 distribution areas ("DA") with inspections that were late or are past due. Table 1 breaks down the total late work orders for the Contra Costa and Alameda County Region by HFTD Tier.

Table 1. Contra Costa and Alameda County Region Distribution Areas with Late Inspections

HFTD Tier	Late Inspection
2	143

3	2
Total	145

To assess the timeliness of AT&T's inspection, ESRB used GO 95, Rule 80.1-A(1) inspection intervals for Tier 2 and 3 or the patrol intervals provided by AT&T in its inspections records, whichever was the shorter interval. Table 2 lists the latest and most overdue inspections.

Table 2. Contra Costa and Alameda County Region Most Overdue Inspections

HFTD Tier	Late Inspection DA_PSA_CD CLLI ID	First Inspection/ Next Inspection (Interval, days)
2	210443 BKLYCA01	5/1/2019 4/22/2023 (1452)
3	110201 ORNDCA11	6/1/2019 7/16/2021 (776)

4. 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 AT&T's Contra Costa and Alameda County Region work orders from August 2019 to July 2024 found that AT&T completed a total of 5,325 work orders late or are late pending. Late pending work orders are work orders that had due dates prior to July 31, 2024 but were not complete by that date. Due dates were determined by using either the due dates provided by AT&T in its data request responses, by applying GO 95, Rule 18-B, or by using the maintenance intervals provided by AT&T in its Overhead Lines Maintenance Plan, whichever provides the earlier due date. Table 3 breaks down the late work orders for the Contra Costa and Alameda County Region

Table 3. Contra Costa and Alameda County Region Late Closed Work Orders

Hazard Level	Complete	Pending	Total
1	136	0	136
2	751	426	1177
2a	207	108	315
2b	776	186	962
2c	118	43	161
3	1601	815	2416
NA	145	13	158
Total	**3734**	**1591**	**5325**

Table 4 lists the latest closed and most past due pending work orders.

Table 4. Contra Costa and Alameda County Region Most Past Due Work Orders

Package ID	Hazard Level	Create Date	Due Date	Closed Date	Days Late	Status
413410	1	2018-09-07	2018-09-10	2019-10-30	415	Complete
435450	1	2018-09-07	2018-09-10	2019-10-30	415	Complete
417070	2	2012-06-12	2015-06-12	2019-11-15	1617	Complete
442783	2a	2014-06-12	2015-06-12	2021-06-09	2189	Complete
423355	2b	2015-08-14	2018-08-14	2023-08-14	1826	Complete
412977	2c	2014-09-16	2015-09-16	2021-06-14	2098	Complete
402203	3	2014-06-11	2019-06-11	2023-07-20	1500	Complete
360797	NA	2017-10-10	2017-10-13	2022-11-07	1851	Complete

III. Field Inspection

During the field audit, ESRB inspected the following facilities:

Table 5. Locations Inspected

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
1	Vault	-121.94323932, 37.74341119
2	Vault	-121.94286132, 37.74353474
3	Vault	-121.94233918, 37.74372638
4	Vault	-121.94358389, 37.74322382
5	Vault	-121.94397117, 37.7431913
6	Vault	-121.94313237, 37.74327074
7	Vault	-121.94290352, 37.74280717
8	Vault	-121.94305474, 37.74274642
9	Vault	-121.94353179, 37.7425745
10	Vault	-121.91921836, 37.81355373
11	Vault	-121.91989718, 37.81402378
12	Vault	-121.91971987, 37.81502445
13	Vault	-121.91899476, 37.81591196
14	Vault (could not locate)	-121.91851169, 37.81593066
15	Vault	-121.91997513, 37.81625738
16	Pole	-121.97720963, 37.8372966
17	Pole	-121.97694803, 37.83771381
18	Pole	-121.97652212, 37.83799898
19	Pole	-121.97717106, 37.83669407
20	Pole	-121.97696478, 37.83660695
21	Pole	-121.97683879, 37.83622785
22	Vault	-121.98327288, 37.52328434
23	Vault	-121.983153, 37.52403549
24	Vault	-121.98288913, 37.52439145
25	Vault	-121.98315439, 37.52474539
26	Vault	-121.98366414, 37.52465758
27	Vault	-121.98400348, 37.52428421
28	Pole	-122.04034408, 37.54651101
29	Pole	-122.03964808, 37.54623232

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
30	Pole	-122.0391617, 37.54591012
31	Pole	-122.03854498, 37.54571862
32	Pole	-122.0380262, 37.54561431
33	Pole	-122.03747517, 37.54527558
34	Pole	-122.04045768, 37.54647868
35	Pole	-122.04065871, 37.54624687
36	Pole	-122.03353038, 37.62030924
37	Pole	-122.0338709, 37.62006479
38	Pole	-122.0341408, 37.61980159
39	Pole	-122.03434167, 37.61959443
40	Cabinet PFP	-122.03316125, 37.61992554
41	Pole	-122.03310393, 37.62009854
42	Pole	-122.03279447, 37.6198969
43	Pole	-122.07539274, 37.62791897
44	Pole	-122.07520846, 37.62781615
45	Pole	-122.07460392, 37.62791778
46	Pole	-122.07461852, 37.62821926
47	Pole	-122.0746776, 37.62860502
48	Pole	-122.07473897, 37.62912096
49	Pole	-122.07469898, 37.62943522
50	Pole	-122.07477165, 37.62989659
51	Pole	-122.0748824, 37.6301923
52	Pole	-122.0714402, 37.71114258
53	Pole	-122.07137522, 37.71156285
54	Pole	-122.07119372, 37.71195909
55	Pole	-122.07139829, 37.71218828
56	Pole	-122.07139858, 37.71290445
57	Pole	-122.07135794, 37.71290995
58	Pole	-122.07138267, 37.71321263
59	Pole	-122.07126093, 37.71352828
60	Pole	-122.14857569, 37.75453481
61	Pole	-122.14844519, 37.75485706
62	Pole	-122.14828941, 37.75523415
63	Pole	-122.14809811, 37.75551608

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
64	Pole	-122.1477971, 37.75598552
65	Pole	-122.14759742, 37.75620164
66	Pole	-122.21119624, 37.82994481
67	Pole	-122.21151953, 37.83008226
68	Pole	-122.21183811, 37.83046132
69	Pole	-122.21165988, 37.830839
70	Pole	-122.14113131, 38.01612192
71	Pole	-122.14131264, 38.01632279
72	Pole	-122.14144076, 38.01648343
73	Pole	-122.14165107, 38.01667081
74	Pole	-122.14184083, 38.01692232
75	Pole	-122.14167231, 38.01697659
76	Pole	-122.14143484, 38.01702226
77	Pole	-122.14097123, 38.01732241
78	Pole	-122.13402724, 37.99347384
79	Pole	-122.1336492, 37.99340221
80	Pole	-122.13322668, 37.99341958
81	Pole	-122.13279895, 37.99346382
82	Pole	-122.13413935, 37.99341092
83	Pole	-122.13415754, 37.99373606
84	Pole	-122.13440054, 37.99420675
85	Pole	-122.13449428, 37.99461356
86	Pole	-122.13448369, 37.99492403
87	Vault	-122.11186004, 37.96179045
88	Vault	-122.1111901, 37.9614014
89	Vault	-122.11076704, 37.96170358
90	Vault	-122.11068009, 37.96231475
91	Vault	-122.1111316, 37.96243193
92	Vault	-122.11072267, 37.96306463
93	Vault	-122.11132446, 37.96296502
94	Vault	-122.11194644, 37.96264623
95	Vault	-122.11215672, 37.96254121
96	Pole	-122.11281661, 37.96170888
97	Pole	-122.11229301, 37.9612662

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
98	Pole	-122.11326964, 37.9620143
99	Pole	-122.11384075, 37.96242562
100	Pole and adjacent vault.	-121.95188452, 37.95984095
101	Pole	-121.95254213, 37.96004027
102	Pole	-121.95304128, 37.96025005
103	Pole	-121.95350968, 37.96057343
104	Pole	-121.9537744, 37.96075039
105	Vault	-121.95261912, 37.96048552
106	Vault	-121.95231342, 37.96097474
107	Vault	-121.95220071, 37.96103235
108	Pole	-121.95146929, 37.95957111
109	Pole	-121.950875, 37.95939792
110	Pole	-121.91619176, 37.92534364
111	Pole	-121.91689242, 37.92562812
112	Pole	-121.91765562, 37.92586461
113	Pole	-121.91543924, 37.92507529
114	Pole	-121.91442376, 37.92472248
115	Vault	-121.94828079, 38.01476791
116	Vault	-121.94768846, 38.01473364
117	Vault	-121.94719477, 38.01440201
118	Vault	-121.94658187, 38.01490828
119	Vault	-121.94627258, 38.01489131
120	Pole	-121.71196685, 37.99643469
121	Pole	-121.71233968, 37.99637726
122	Pole	-121.71294297, 37.99655117
123	Pole	-121.71335148, 37.99648246
124	Pole	-121.71380009, 37.99645682
125	Pole	-122.28145918, 37.95940358
126	Pole	-122.28100118, 37.95886969
127	Pole	-122.28086895, 37.9587929
128	Pole	-122.28064849, 37.95860989
129	Pole	-122.28027822, 37.95832361
130	Pole	-122.28146253, 37.90228904
131	Pole	-122.28158846, 37.90256701

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
132	Pole	-122.28146432, 37.90283561
133	Pole	-122.28156236, 37.90309514
134	Pole	-122.28158968, 37.90340749
135	Pole	-122.2814255, 37.90370397
136	Pole	-122.28123214, 37.90202791
137	Pole	-122.28096371, 37.90169749
138	Pole	-122.29945408, 37.869391
139	Pole	-122.29948667, 37.86954372
140	Pole	-122.2995098, 37.86979985
141	Pole	-122.29957278, 37.87019992
142	Pole	-122.29960509, 37.87031021
143	Pole	-122.29964991, 37.87043329
144	Pole	-122.29972195, 37.87045496
145	Pole	-122.29984677, 37.87081966
146	Pole	-122.29994335, 37.87122701
147	Pole	-122.2999052, 37.87135342
148	Pole	-122.24644711, 37.85097759
149	Pole	-122.24682454, 37.85127867
150	Pole	-122.24709633, 37.85149567
151	Pole	-122.24726894, 37.85166785
152	Pole	-122.24624834, 37.85089095
153	Pole	-122.2459542, 37.85079703
154	Vault	-122.13235385, 37.82672755
155	Vault	-122.13253623, 37.82706865
156	Vault	-122.13239591, 37.82740949
157	Pole	-122.1319491, 37.82699826
158	Pole	-122.13175174, 37.82732861
159	Pole	-122.13145049, 37.82812119
160	Pole	-122.03246911, 37.90592511
161	Pole	-122.03286739, 37.90644335
162	Pole	-122.033128, 37.90675728
163	Vault	-122.02252056, 37.86790748
164	Vault	-122.0226005, 37.8683277
165	Vault	-122.0225744, 37.86879661

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
166	Vault	-122.02252771, 37.86904553
167	Vault	-122.0225635, 37.86958837
168	Vault	-122.02222792, 37.87068265
169	Pole	-121.75455425, 37.73820967
170	Pole	-121.7551985, 37.73796588
171	Pole	-121.75527967, 37.73812521
172	Pole	-121.75587072, 37.73794891
173	Pole	-121.75636224, 37.73799487
174	Pole	-121.75726985, 37.7379853
175	Pole	-121.75823004, 37.73799318
176	Pole	-121.72303077, 37.7030595
177	Pole	-121.72348456, 37.70302843
178	Pole	-121.72252885, 37.70315963
179	Pole	-121.72245762, 37.70343429
180	Pole	-121.72317204, 37.70324965
181	Vault	-121.90594413, 37.67447575
182	Vault	-121.90613952, 37.67476987
183	Vault	-121.90634897, 37.67502636
184	Vault	-121.90660694, 37.67536701
185	Vault	-121.90667489, 37.67558742
186	Vault	-121.90702781, 37.67575531
187	Vault	-121.90641752, 37.67422734
188	Vault	-121.90674543, 37.67415442
189	Vault	-121.90684965, 37.67437799
190	Vault	-121.90697707, 37.67465977
191	Pole	-121.94204984, 37.70253343
192	Pole	-121.94265042, 37.70239051
193	Pole	-121.94331247, 37.70206218
194	Pole	-121.94243885, 37.70189955
195	Pole	-121.94223266, 37.7015399

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **GO 95, Rule 31.1, Design, Construction and Maintenance** states in part:

> *"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service."*

ESRB's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 31.1 Findings

Location	Findings
35	Down guys of AT&T and other entity are intertwined.
60	There is a buddy pole.
70	Splice case open.
76	Open splice box.
85	AT&T on buddy pole
101	Riser falling from pole
104	The tarp covering a splice is torn open.
112	There is a buddy pole.
139	Equipment box is open.
150	Open terminal case.
151	Open terminal case.
153	Open terminal case.
157	There is a buddy pole.
171	There is an overhead wire going down to a terminal at ground level.

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

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

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

Table 7: GO 95, Rule 31.6 Findings

Location	Findings
179	There are abandoned drops below acceptable height.

3. **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 8:

Table 8: GO 95, Rule 35 Findings

Location	Findings
64	There is strain on overhead lines from nearby vegetation.
139	Vegetation strain on cable.

4. **GO 95, Rule 37, Minimum Clearance of Wires above Railroads, Thoroughfares, Buildings, Etc.** states in part:

> *"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
153	Service drop below acceptable clearance.
158	Span below acceptable clearance.

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 10:

Table 10: GO 95, Rule 38 Findings

Location	Findings
21	Drop touching down guy.
21	Comcast and other party are touching midspan.
28	Touching service drops.
36	AT&T service drop touching PG&E drop.
41	AT&T service drop touching other service drop
44	Service drop contact with down guy.
45	Service drop touching other party drop.
69	Service drop touching span guy.
72	Other party cable touching AT&T wires.
81	Contact between drop and span guy.
108	Service drops are contacting.

Location	Findings
121	AT&T service drop touching other party drop.
134	Contact with other entity's cable.
151	AT&T service drop contacting supply drop.
191	Contact between AT&T and other party service drops.

6. **GO 95, Rule 44.3, Replacement** states in part:

"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."

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

Table 11: GO 95, Rule 44.3 Findings

Location	Findings
172	Broken lashing wire.

7. **GO 95, Rule 84.6-B, Ground Wires** states in part:

"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 12:

Table 12: GO 95, Rule 84.6-B Findings

Location	Findings
44	Broken ground moulding.
157	Broken ground cover.

8. **GO 95, Rule 84.6-F, Protective Covering** states in part:

"Protective covering shall be Attached to poles, crossarms and structures by means of corrosion–resistant straps, lags or staples which are adequate to maintain such covering in a fixed position.
Where such covering consists of hardwood or rigid plastic moulding, the distance between straps, lags or staples shall not exceed three feet on each side and due care shall be exercised to avoid the possibility of nails protruding through any inner surface. When U–shaped moulding is utilized appropriate gaps between sections shall be provided to permit expansion due to temperature variations and such gaps shall be covered by corrosion resistant straps to prevent contact with conductors covered by moulding."

ESRB's findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 84.6-F Findings

Location	Findings
113	AT&T riser cover not secure.

9. **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 14:

Table 14: GO 95, Rule 86.2 Findings

Location	Findings
20	Loose down guy.
28	Loose down guy.

10. **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 15:

Table 15: GO 95, Rule 86.7-B Findings

Location	Findings
157	Vegetation contacting down guy above insulator.

11. **GO 95, Rule 86.9, Guy Marker (Guy Guard)** states in part:

"A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is Attached to an anchor rod, only the outermost guy is required to have a marker."

ESRB's findings related to the above rule are listed in Table 16:

Table 16: GO 95, Rule 86.9 Findings

Location	Findings
33	Missing anchor guy cover.
39	Broken anchor guy cover.

12. GO 95, Rule 87.7-D.1, Covered from Ground Level to 8 Feet above the Ground states in part:

> *"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 17:

Table 17: GO 95, Rule 87.7-D.1 Findings

Location	Findings
64	Exposed riser at 5-foot level.
83	Loose riser at ground level.
96	Riser not covered.
137	Riser without cover and not attached to pole at 6 foot level.
138	Exposed riser.
158	Riser cover stops below 8 feet.
161	Exposed risers. Includes AT&T and possibly other provider.
179	Exposed riser and insecure riser.

13. GO 95, Rule 91.3 – C, Joint Poles or Poles Jointly Use, Stepping states in part:

> *"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits*

operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps."

ESRB's findings related to the above rule are listed in Table 18:

Table 18: GO 95, Rule 91.3-C Findings

Location	Findings
42	Low step below 8 feet.

14. GO 95, Rule 93, Climbing Space states in part:

"Climbing space shall be provided on all jointly used poles in accordance with the provisions of Rules 54.7, 54.9, 54.10, 54.11, 54.12, and 84.7.
Climbing space on jointly used poles shall be maintained so that its position in relation to the pole is not changed by more than 90 degrees in a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level."

ESRB's findings related to the above rule are listed in Table 19:

Table 19: GO 95, Rule 93 Findings

Location	Findings
84	Climbing space blocked by vegetation.

15. GO 128, Rule 17.1, Design, Construction and Maintenance states in part:

"*Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

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 20:

Table 20: GO 128, Rule 17.1 Findings

Location	Findings
91	Vault interior completely filled with soil.
117	Vault lid blocked by lawn.
154	Vault was open.
183	Vault interior completely filled with soil.
184	Vault lid stuck and lid integrity in uncertain.

16. 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 21:

Table 21: GO 128, Rule 42.7 Findings

Location	Findings
4	Damaged lid.
6	Damaged lid.
91	Damaged lid.
166	Damaged lid.

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 22.

Table 22: Third-Party Observations

Location	Third-Party	Observations
2	Unknown	Insecure lid.
9	Pacific Gas and Electric	Damaged lid.
18	Unknown	Cable touching down guy wire.
19	Pacific Gas and Electric	Vegetation touching down guy above insulator.
20	Unknown	Loose down guy.
21	Unknown	Third-party service drop touching down guy.
33	Unknown	Broken ground wire mold.
38	Pacific Gas and Electric	Broken moulding about 15 feet up

Location	Third-Party	Observations
42	Pacific Gas and Electric	Vegetation touching anchor guy above insulator.
56	Unknown	Exposed ground.
63	Unknown	Vegetation touching down guy above insulator.
66	Unknown	Service drop touching down guy.
75	Unknown	Third-party abandoned cable.
86	Pacific Gas and Electric	Exposed ground wire about 15 feet up.
97	Pacific Gas and Electric	Exposed riser at ground.
103	Unknown	Riser cover broken at ground level.
109	Unknown	Exposed riser.
109	Unknown	Riser cover not secure at ground level.
114	Unknown	Riser cover missing.
120	Comcast	Copper ground missing and reachable.
125	Unknown	Exposed ground wire.
128	Unknown	Broken ground moulding.
131	Comcast	Service drop touching anchor guy.
131	Sonic	Span cover falling off.
136	Sonic	Span cover falling off.
139	Unknown	Exposed risers.
150	Unknown	Exposed riser.
156	Unknown	Broken vault lid about 20 feet from AT&T asset.
161	Unknown	Vegetation touching down guy above insulator.
161	Pacific Gas and Electric	Vegetation touching down guy above insulator.
162	Comcast	Exposed riser at ground level.
163	Pacific Gas and Electric	Loose lid.
163	Unknown	Loose lid.
164	Unknown	Loose lid.

Location	Third-Party	Observations
177	Unknown	Enclosure damaged and insecure.
191	Pacific Gas and Electric	Broken ground covering.