

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



December 13, 2024

CA2024-1306

Rex Knowles, Director – Government Affairs
Verizon
9656 Prosperity Road, West Jordan, Utah 84088

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Verizon San Francisco & San Mateo County Region.

Mr. Knowles:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Gordon Szeto of ESRB staff conducted an CIP audit of Verizon's San Francisco & San Mateo County region from September 16 to September 20, 2024. During the audit, ESRB staff conducted field inspections of Verizon's 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 14, 2025, by electronic copy of all corrective actions and preventive measures taken by Verizon 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 the audit on the CPUC website. If there is any information in your response that you want 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 Gordon Szeto at (415) 603-9855 or gordon.szeto@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

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

Enclosure: CPUC CIP Audit Report for Verizon San Francisco & San Mateo County Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC

Yi Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Gordon Szeto, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Jane Whang, State Government Affairs & Regulatory, Verizon

**CPUC AUDIT FINDINGS OF VERIZON
SAN FRANCISCO AND SAN MATEO COUNTY**

I. Records Review

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

- Verizon’s Pole Inspection Program
- Verizon’s Inspection Training Program
- Verizon Wireless Facility Statistics of San Francisco & San Mateo Counties
- Verizon’s List of Facility Locations
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the Last 5 Years (2019 – 2023)
- Most Recent Work Orders Starting January 2023
- Pole Loading Calculations Conducted in the Last 5 Years (2019 – 2023)
- Safety Hazard Notifications Verizon Received and Sent to Third Parties in the Last 5 Years (2019 – 2023)

II. Records Violations

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

1. GO 95, Rule 80.1A(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, inspection intervals for (i) Communication Lines located on Joint Use Poles (see Rule 21.8) that contain Supply Circuits (see Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table.”

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

Verizon has 36 Joint Use Poles in Kings Mountain and La Honda in San Mateo County which are in Tier 3 and Tier 2 locations based on the maps of facility locations provided in Pre-Audit Data Request item 3. As shown in Table 1 below, for the 26

Tier 3 locations, patrol inspections were missing at 26 Sites in 2019 to 2023. Out of a total of 130 patrols/detailed inspections which should have been done at the Tier 3 Sites, 59 (45.4%) were missing. For the last seven Sites in Table 1, no patrols or detailed inspections were listed in the spreadsheets provided. It is also noted that no patrols or detailed inspections were performed at any Tier 2 or Tier 3 Site in 2023. Tier 2 Sites at HWY35/84-22, HWY35/84-23, HWY35/84-24 and HWY35/84-25, which require a patrol every two years, have not had one done in the last four years.

Table 1: Patrols and Inspections at Kings Mountain and La Honda

Site Name	Tier	2019	2020	2021	2022	2023
Hw35/84-01	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-02	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	None	None
Hw35/84-03	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-04	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	None	None
Hw35/84-05	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-07	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	None	None
Hw35/84-08	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-09	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-10	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-11	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	None	None
Hw35/84-12	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-13	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-14	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-16	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-17	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-18	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	None	None
Hw35/84-19	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-20	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None

Hw35/84-21	3	Detail 12/5/19	Patrol 5/8/20	Detail 6/3/21	Patrol 11/03/22	None
Hw35/84-22	2	Detail 12/5/19	None	None	None	None
Hw35/84-23	2	Detail 12/5/19	None	None	None	None
Hw35/84-24	2	Detail 12/5/19	None	None	None	None
Hw35/84-25	2	Detail 12/5/19	None	None	None	None
Hw35/84-26	2	Detail 12/5/19	Patrol 5/8/20	None	Patrol 11/03/22	None
Hw35/84-27	2	Detail 12/5/19	Patrol 5/8/20	None	Patrol 11/03/22	None
Hw35/84-28	2	Detail 12/5/19	Patrol 5/8/20	None	Patrol 11/03/22	None
Hw35/84-29	2	Detail 12/5/19	Patrol 5/8/20	None	Patrol 11/03/22	None
Hw35/84-32	2	Detail 12/5/19	Patrol 5/8/20	None	Patrol 11/03/22	None
Hw35/84-35	2	Detail 12/5/19	Patrol 5/8/20	None	Patrol 11/03/22	None
Hw35/84-40	3	None	None	None	None	None
Hw35/84-41	3	None	None	None	None	None
Hw35/84-42	3	None	None	None	None	None
Hw35/84-43	3	None	None	None	None	None
Hw35/84-44	3	None	None	None	None	None
Hw35/84-45	3	None	None	None	None	None
Hw35/84-62	3	None	None	None	None	None

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

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

Verizon’s inspection spreadsheets are missing the personnel who performed each inspection, and the personnel who performed each corrective action.

3. GO95, Rule 18.B, Maintenance Programs states:

“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.”

ESRB did not receive any data for Verizon’s Overhead and Underground Maintenance Policies Procedures and Programs that were effective for July 2019 through July 2024 for compliance with GOs 95 and 128 in the response to the Pre-Audit Data Request.

III. Field Inspection

During the field inspection from September 16 - September 20, 2024, ESRB staff inspected Verizon’s wireless communication facilities in the locations listed in Table 2.

Table 2: Field Inspection Locations

Location #	Address/GPS Location	Structure Type	PSLOC
1	895 24 th Ave San Francisco, CA	Pole	414732
2	4605 Balboa St. San Francisco, CA	Pole	404694
3	6700 Fulton St. San Francisco, CA	Pole	414729
4	850 La Playa St. San Francisco, CA	Pole	414728
5	850 La Playa St. (one span from Site 4) San Francisco, CA	Pole	414728
6	900 La Playa St. San Francisco, CA	Pole#110020383	NA
7	4801 Balboa St. San Francisco, CA	Pole	404696
8	4801 Balboa St. (one span from Site 7)	Pole#110021775	404696

Location #	Address/GPS Location	Structure Type	PSLOC
	San Francisco, CA		
9	5455 Anza St. San Francisco, CA	Pole	404693
10	168 Seal Rock Dr. San Francisco, CA	Pole	404697
11	1201 33rd Ave. San Francisco, CA	Pole	414742
12	1206 40th Ave. San Francisco, CA	Pole	414743
13	1695 Beach St San Francisco, CA	Pole	414167
14	1695 Beach St San Francisco, CA	UG Splice Box	414167
15	1695 Beach St San Francisco, CA	UG Vault	414167
16	301 Marina Blvd. San Francisco, CA	Pole	414144
17	301 Marina Blvd. San Francisco, CA	UG Splice Box	414144
18	701 Marina Blvd. San Francisco, CA	Pole	414142
19	701 Marina Blvd. San Francisco, CA	UG Splice Box	414142
20	3666 Baker St. San Francisco, CA	Pole	414141
21	3666 Baker St. San Francisco, CA	UG Splice Box	414141
22	1900 Jefferson St San Francisco, CA	Pole	414146
23	1900 Jefferson St. San Francisco, CA	UG Splice Box	414146
24	3630 Divisadero St. San Francisco, CA	Pole	414147
25	3630 Divisadero St. San Francisco, CA	UG Splice Box	414147
26	2390 Chestnut St. San Francisco, CA	Pole	414151
27	2390 Chestnut St. San Francisco, CA	UG Splice Box	414151
28	2201 Francisco St. San Francisco, CA	Pole	414171
29	2201 Francisco St. San Francisco, CA	UG Splice Box	414171

Location #	Address/GPS Location	Structure Type	PSLOC
30	2395 Francisco St. San Francisco, CA	Pole	414150
31	2395 Francisco St. San Francisco, CA	UG Splice Box	414150
32	3465 Broderick St. San Francisco, CA	Pole	414148
33	3465 Broderick St. San Francisco, CA	UG Splice Box	414148
34	3500 Divisadero St. San Francisco, CA	Pole	414165
35	3500 Divisadero St. San Francisco, CA	UG Splice Box	414165
36	3560 Divisadero St. San Francisco, CA	Pole	414165
37	3560 Divisadero St. San Francisco, CA	UG Splice Box	414165
38	3398 Baker St. San Francisco, CA	Pole	414168
39	3398 Baker St. San Francisco, CA	UG Splice Box	414168
40	2460 Union St. San Francisco, CA	Pole	414926
41	2460 Union St. San Francisco, CA	UG Splice Box	414926
42	2600 Vallejo St. San Francisco, CA	Pole	414957
43	2600 Vallejo St. San Francisco, CA	UG Splice Box	414957
44	1319 30 th Ave. San Francisco, CA	Pole	384153
45	1396 35 th Ave. San Francisco, CA	Pole	384152
46	HWY35/84-21 Kings Mountain, CA Lat 37.36727, Long -122.262	Pole	156424
47	HWY35/84-21 (One span South of Site 46) Kings Mountain, CA	Pole#120861543	156424
48	HWY35/84-21 (One span South of Site 47) Kings Mountain, CA	Pole#121136791	156424
49	HWY35/84-21 (Across road from Site 48) Kings Mountain, CA	Pole#120974027	156424

Location #	Address/GPS Location	Structure Type	PSLOC
50	HWY35/84-20 Kings Mountain, CA Lat 37.37121, Long -122.263	Pole	156424
51	HWY35/84-20 (Across road from Site 50) Kings Mountain, CA	Pole	156424
52	HWY35/84-20 (One span North of Site 50) Kings Mountain, CA	Pole#110502719	156424
53	HWY35/84-17 Kings Mountain, CA Lat 37.38571, Long -122.264	Pole	156424
54	HWY35/84-41 Kings Mountain, CA Lat 37.392976, Long -122.261	Pole	N/A
55	HWY35/84-41 (One span North of Site 54) Kings Mountain, CA	Pole#110502579	N/A
56	HWY35/84-41 (One span North of Site 55) Kings Mountain, CA	Pole#122117772	N/A
57	HWY35/84-41 (Across road from Site 56) Kings Mountain, CA	Pole#121677678	N/A
58	HWY35/84-41 (About 30 feet North of Site 57) Kings Mountain, CA	Pole	N/A
59	HWY35/84-62 Kings Mountain, CA Lat 37.39269, Long -122.2573	Pole	N/A
60	HWY35/84-62 (One span South of Site 59) Kings Mountain, CA	Pole	N/A
61	HWY35/84-43 Kings Mountain, CA	Pole	N/A
62	HWY35/84-42 Kings Mountain, CA Lat 37.401349, Long -122.257	Pole and UG Pull Box	N/A
63	Beverly Drive/Bayview Drive Redwood City, CA Lat 37.500415, Long -122.283	Pole#110080132	N/A
64	Beverly Drive/Bayview Drive (One span South of Site 63) Redwood City, CA	Pole#121198896	N/A

Location #	Address/GPS Location	Structure Type	PSLOC
65	Beverly Drive/Bayview Drive Redwood City, CA Lat 37.5006, -122.2828906	Pole#110080137	N/A
66	Beverly Drive/Bayview Drive Redwood City, CA Lat 37.5000797, -122.283109	Pole#110080135	N/A
67	Beverly Drive/Bayview Drive (One span North of Site 66) Redwood City, CA	Pole#120855643	N/A
68	Beverly Drive/Chilton Ave. Redwood City, CA Lat 37.50144, Long -122.3837	Pole#110077610	N/A
69	Beverly Drive/Chubb Drive Redwood City, CA Lat 37.50144, Long -122.3837	Pole#120871647	N/A
70	Beverly Drive/Chubb Drive Redwood City, CA Lat 37.50112, Long -122.2845	UG Vault	N/A
71	Melendy Drive/Somerset Ct. Redwood City, CA Lat 37.49026, Long -122.2783	Pole#120875011	N/A
72	Melendy Drive/Somerset Ct. (One span North of Site 71) Redwood City, CA	Pole#222276	N/A
73	Melendy Drive/Portofino Dr. Redwood City, CA Lat 37.49160, Long-122.27859	Pole#110077565	N/A
74	Melendy Drive/Portofino Dr. Redwood City, CA Lat 37.49142, Long-122.27803	Pole#110077564	N/A
75	Crestview Drive/Brittan Ave. Redwood City, CA Lat 37.48219, Long-122.28413	Pole#122024779	N/A
76	1090 Crestview Drive Redwood City, CA	Pole#122086057	N/A
77	1050 Crestview Drive Redwood City, CA	Pole#121169982	N/A
78	1041 Crestview Drive Redwood City, CA Lat 37.48365, Long-122.284	Pole#121717609	N/A
79	1031 Crestview Drive Redwood City, CA	Pole	N/A
80	1001 Crestview Drive Redwood City, CA	Pole	N/A

Location #	Address/GPS Location	Structure Type	PSLOC
81	101 Fair Oaks Lane Atherton, CA Lat 37.464967,Long-122.1981	Pole#122097093	383644
82	157 Stockbridge Ave Atherton, CA Lat 37.456086,Long-122.2155	Pole	309212
83	98 Shelby Lane Atherton, CA Lat 37.46223,Long-122.2158	Pole#120170789	309227
84	98 Shelby Lane Atherton, CA Lat 37.46223,Long-122.2158	UG Splice Box	309227
85	1435 Valparaiso Ave Atherton, CA Lat 37.44364,Long-122.19792	Pole	309127
86	1435 Valparaiso Ave Atherton, CA Lat 37.44364,Long-122.19792	Pole#5-82- T40458587	309127

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. GO 95, Rule 31.1 Design, Construction 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 communication or supply lines and equipment.

A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard...”

ESRB’s findings related to above Rule are listed in Table 3:

Table 3: GO 95, Rule 31.1 Findings

Location #	Finding
1	Verizon antenna does not have 10 inch clearance from Crown Castle cable.
2	Verizon antenna does not have 10 inch clearance from Crown Castle cable.
11	Verizon antennas do not meet required 24 inch clearance from City of San Francisco Fire Alarm circuit.
18	Vegetation is impeding access to lower Verizon radio.
41	Ground wire is not attached to ground rod.
44	Verizon antennas do not meet required 24 inch clearance from Crown Castle cable.
46	Lower Verizon radio is not grounded.

Location #	Finding
50	Lower Verizon radio is not grounded.
59	Antenna does not have 24 inch separation from guy wire.
63	Verizon snowshoe contacting Comcast cable.
64	Verizon cable is in contact with ASTOUND cable.
68	Verizon cable does not have 72 inch clearance from PGE primary cables.
73	Verizon cable is in contact Comcast cable.
75	Verizon cable is not grounded at dead end pole.
75	Verizon cable does not meet 12 inch separation from Comcast cable.
80	Verizon cable does not meet 48 inch separation from PG&E secondary conductor with guard arm present.
80	Verizon lashing to cable is loose.
82	Verizon box is missing lock.
83	Verizon box is missing lock.
85	Verizon box is missing lock.

2. GO 95, Rule 84.7A – Climbing Space states:

“Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c , 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

The climbing space shall be maintained in the same position on the pole for minimum vertical distance of 4 feet above and below each conductor level through which it passes, excepting that where a cable is attached to a crossarm or a pole with the cable

less than 9 or 15 inches from the center line of the pole supporting conductors on line arms (no buck arm construction involved) in accordance with the provisions of Rules 84.4–D1 or 87.4–C3 , the 4 foot vertical distance may be reduced to not less than 3 feet.

The position of the climbing space shall not be shifted more than 90 degrees around the pole within a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.

The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–E.”

ESRB’s findings related to above Rule are listed in Table 4:

Table 4: GO 95, Rule 84.7A Findings

Location #	Finding
2	Equipment (fiberoptic line) is impeding climbing space.
9	Equipment (ground line) is impeding climbing space.
12	Equipment (riser) is impeding climbing space.
44	Equipment (coaxial cable) is impeding climbing space.
46	Equipment (riser and cable) are impeding climbing space.
50	Equipment (riser and cable) are impeding climbing space.
53	Equipment (riser and cable) are impeding climbing space.
61	Equipment (riser and cable) are impeding climbing space.
76	Telco service drop is impeding climbing space.
78	Telco service drop is impeding climbing space.
79	Telco service drop is impeding climbing space.
80	Vegetation is impeding climbing space.

Location #	Finding
82	Equipment (fiberoptic cable) is impeding climbing space.

3. GO 95, Rule 87.4 H From Grounded Metal Boxes, Hardware and Equipment Associated with Supply Lines states:

“Cables and messengers installed on non-metallic poles or non-metallic structures shall have a minimum clearance of 48 inches below or 72 inches above grounded metal boxes, hardware or metal cases for equipment associated with supply lines.”

Exceptions:

- (1) The 72 inches above may be reduced to 48 inches where there is not a pole mounted communication drop distribution terminal above the grounded metal box, hardware or metal case for equipment, or where the grounded metal box, hardware or metal case for equipment is securely bonded to the communication cable and/or messenger.*
- (2) The 72 inches above may be reduced to 48 inches when the grounded metal box, hardware or metal case for equipment is on the opposite side of a pole from a pole mounted communication drop distribution terminal.*

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

Table 5: GO 95, Rule 87.4 H Findings

Location #	Finding
1	Grounded metal equipment does not meet 48 inch clearance with messenger above.
2	Grounded metal equipment does not meet 48 inch clearance with messenger above.
3	Grounded metal equipment (upper Verizon radio) does not meet 48 inch clearance with messenger below.
3	Grounded metal equipment (lower Verizon radio) does not meet 48 inch clearance with messenger above.
4	Grounded metal equipment (upper Verizon radio) does not meet 48 inch clearance with messenger below.
4	Grounded metal equipment (lower Verizon radio) does not meet 48 inch clearance with messenger above.

Location #	Finding
11	Grounded metal equipment does not meet 48 inch clearance with messenger above.
12	Grounded metal equipment does not meet 48 inch clearance with messenger above.

4. GO 95, Rule 94.4.C. Clearances states in part:

“Antennas, associated equipment (e.g. terminations, enclosures) and support elements installed above supply lines and/or communication lines of different ownership attached to the same structure shall maintain the vertical clearances specified in Rule 38, Table 2, Case 21, Columns A - H.”

ESRB’s findings related to above Rule are listed in Table 6:

Table 6: GO 95, Rule 94.4 C Finding

Location #	Finding
46	Antenna does not meet 48 inch clearance from PG&E service drop.
50	Antenna does not meet 48 inch clearance from PG&E service drop.
53	Antenna does not meet 48 inch clearance from PG&E service drop.
54	Antenna does not meet 48 inch clearance from PG&E service drop.

5. GO 95, Rule 94.8.B, Risers and Vertical Runs states:

“The suitable protective covering (see Rule 22.8) for risers and vertical runs passing supply lines and/or equipment shall extend no less than (see Figure 94.1): (1) 3 ft. above lines energized from 0 – 750 Volts. (2) 6 ft. above lines energized from 750 – 35,000 Volts. (3) 9 ft. above lines energized from 35,000 – 50,000 Volts.”

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

Table 7: GO 95, Rule 94.8 B Finding

Location #	Finding
45	Riser above crossarm does not meet 72 inch clearance from PG&E primary supply conductor.
53	Riser does not meet 36 inch clearance from PG&E secondary supply conductor.
54	Riser does not meet 36 inch clearance from PG&E secondary supply conductor.

6. GO 95, Rule 94.3A, General Requirements states:

“Antennas shall meet the requirements of Class C equipment, unless otherwise specified in this rule.”

GO 95, Rule 84.6B, 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.”

ESRB’s finding related to above Rules is listed in Table 8:

Table 8: GO 95, Rules 84.6B and 94.3A Finding

Location #	Finding
61	Ground moulding is broken.

7. GO 95, Rule 94.5B, Marking states:

“Joint use poles shall be marked with a sign for each antenna installation as follows:

- (1) Identification of the antenna operator*
- (2) A 24-hour contact number of antenna operator for Emergency or Information*
- (3) Unique identifier of the antenna installation.”*

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

Table 9: GO 95, Rule 94.5B Finding

Location #	Finding
3	Verizon sign is coming loose and needs to be re-attached.
40	Verizon sign is rotated 90 degrees and needs to be re-attached.
44	Verizon sign is coming loose and needs to be re-attached.

8. 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 finding related to above Rule is listed in Table 10:

Table 10: GO 128, Rule 17.8 Finding

Location #	Finding
15	No mark of Verizon ownership on UG Vault cover.

V. Observations

1. 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.”

ESRB’s findings related to above Rule are listed in Table 11:

Table 11: GO 95, Rule 18-A Findings

Location	Findings	Notes
1	PG&E box is missing lock.	PG&E is responsible utility.
1	PG&E box has graffiti.	PG&E is responsible utility.
1	PG&E secondary conductor cable outer covering is damaged	PG&E is responsible utility.
2	PG&E box has graffiti.	PG&E is responsible utility.
2	Low cable clearance (13 ft 3 inches) at road centerline.	ATT is responsible utility.
2	Crown Castle disconnect box is missing lock.	Crown Castle is responsible utility.
2	Crown Castle disconnect box is missing emergency notification label.	Crown Castle is responsible utility.
3	PG&E box is missing lock.	PG&E is responsible utility.
3	Crown Castle disconnect box is missing lock.	Crown Castle is responsible utility.
3	Crown Castle has exposed ground.	Crown Castle is responsible utility.
4	PG&E box is missing lock.	PG&E is responsible utility.
4	PG&E box is corroded/damaged.	PG&E is responsible utility.
4	PG&E has broken overhead guy.	PG&E is responsible utility.
4	Abandoned equipment on pole.	PG&E is responsible utility.

4	Crown Castle disconnect box is missing lock.	Crown Castle is responsible utility.
4	Crown Castle disconnect box is corroded/damaged and busbar is corroded/damaged.	Crown Castle is responsible utility.
4	Crown Castle line is dead ended on pole so needs ground.	Crown Castle is responsible utility.
5	PG&E has broken overhead guy, rusted riser and damaged anchor rod.	PG&E is responsible utility.
6	PG&E has several damaged down guys, damaged anchor rod, damaged ground wire molding, and transformer that is not grounded.	PG&E is responsible utility.
6	ATT fiberoptic cable is abandoned.	ATT is responsible utility.
7	PG&E power box is missing cover and lock and is exposed Verizon called 24 hour emergency number to repair during the audit.	PG&E is responsible utility.
7	ATT cable is contacting Crown Castle fiber cable, low cable clearance at curb (14 ft), low cable clearance (11 ft) at Balboa/LaPlaya St	ATT is responsible utility.
7	Crown Castle busbar is corroded/damaged, disconnect box is corroded/damaged, Crown cable has broken strand, Crown ground molding is damaged and not attached to pole.	Crown Castle is responsible utility.
8	Comcast has dangling cable which is also wrapped at climbing step and impeding climbing space. Comcast and ATT lines are contacting.	Comcast is responsible utility.
8	ATT cable has low clearance (14 ft) at curb.	ATT is responsible utility.

9	PG&E box is missing lock, PGE box is corroded/damaged, power box does not have ground, bolts on crossarm need trimming to avoid climbing hazard.	PG&E is responsible utility.
9	Crown Castle box is corroded/damaged, Crown box is missing lock, fiberoptic line is loose with loose lashing, fiberoptic line messenger does not have 10 inch separation from Verizon coaxial cable, green ground wire cover is damaged and needs to be moved out of climbing space.	Crown Castle is responsible utility.
10	PG&E box is missing lock and power box has an exposed ground wire.	PG&E is responsible utility.
10	ATT cable has low clearance road centerline.	ATT is responsible utility.
10	Comcast cable has low clearance road centerline.	Comcast is responsible utility.
10	Crown Castle box is missing lock, fiberoptic cable does not have 10 inch separation from Verizon radio drip loop, fiberoptic line has low clearance at road centerline, ground line from radio is exposed, and has abandoned riser straps on pole.	Crown Castle is responsible utility.
11	Crown Castle splice box is contacting Comcast cable.	Crown Castle is responsible utility.
11	Crown Castle coaxial cable is supplying power to Verizon radios and does not meet 10 feet clearance height above pedestrians.	Crown Castle is responsible utility.
11	Crown Castle box has graffiti.	Crown Castle is responsible utility.
12	PG&E box is missing lock.	PG&E is responsible utility.

12	Crown Castle box is missing lock and is missing emergency notification label.	Crown Castle is responsible utility.
12	Comcast cable does not have 12 inch separation to ATT cable and white colored riser is blocking climbing space.	Comcast is responsible utility.
44	PG&E box is missing lock.	PG&E is responsible utility.
44	Crown Castle box is missing lock, fiberoptic cable lashing is loose, fiberoptic cable is not attached to pole, coaxial cable is looped back and abandoned, fiberoptic cable is not attached every 3 feet to pole, fiberoptic cable is blocking climbing space, and fiberoptic cable has low clearance (16 ft) at centerline of road.	Crown Castle is responsible utility.
45	Crown Castle box is corroded/damaged and missing lock, busbar is only 7ft 6 inch from ground and accessible to pedestrians, coaxial power cable is only 7 feet above ground level and is uncovered and accessible to pedestrians, fiberoptic line is only 4 feet 6 inches below PGE secondary supply line and does not meet 6 feet requirement and therefore requires double guard arm, and Crown riser above primary crossarm is only 2 feet 6 inches so does not meet 6 feet requirement.	Crown Castle is responsible utility.
45	ATT cable has low clearance at road center.	ATT is responsible utility.
46	Extenet disconnect box is missing lock and ID label, pole has damaged High Visibility Strip, antennas don't meet 4 feet separation from PGE service drop, and Riser and cables are	Extenet is responsible utility.

	blocking climbing space.	
47	All communications cables need to be transferred to new pole.	ATT, Comcast, Extenet are responsible utilities.
48	ATT terminal box is dangling and needs to be attached to pole.	ATT is responsible utility.
49	PG&E guy wire is loose.	PG&E is responsible utility.
49	ATT service drop is attached to pole with rope.	ATT is responsible utility.
50	ATT cable low clearance (17 ft 2 inch) road centerline.	ATT is responsible utility.
50	PG&E has exposed ground molding.	PG&E is responsible utility.
50	Extenet box needs ID label, antennas don't have 4 feet separation from PGE service drop, Riser and cables are blocking climbing space,	
51	Extenet cable contacting Comcast cable, Extenet cable in strain on tree branch, 100 feet North of pole Extenet splice box contacting Comcast cable.	Extenet is responsible utility.
51	Comcast cable in strain on tree branch.	Comcast is responsible utility.
52	Extenet snowshoe 4 ft from communications alley arm is contacting Comcast cable.	Extenet is responsible utility.
52	Communications alley arm is starting to crack and is vulnerable to future failure. Need safety factor calculation from communications companies.	ATT, Comcast, and Extenet are responsible utilities.
53	Extenet need to trim vegetation next to disconnect box, antennas don't have 4 feet separation from PGE service drop, Extenet riser is not 3 feet above PGE	Extenet is responsible utility.

	service drop, battery box ground wire is damaged, Riser and cables are blocking climbing space.	
53	ATT cable has low clearance (13 feet 1 inch) at gas station outside SKYWOOD Trading Post and ATT cable is not lashed near pole.	ATT is responsible utility.
53	PG&E has exposed ground at pole.	PG&E is responsible utility.
54	PG&E has exposed ground at pole.	PG&E is responsible utility.
54	Extenet antennas do not have 4 feet separation from PGE service drop, Extenet riser on other side of pole does not have 3 feet separation from PGE service drop.	Extenet is responsible utility.
55	PG&E needs to remove old pole adjacent to new pole.	PG&E is responsible utility.
56	ATT cable and splice case have low clearance (15 feet 7 inch) at road center.	ATT is responsible utility.
57	PG&E needs to remove temporary pole with exposed ground rod that was used to provide service during recent accident and hill damage.	PG&E is responsible utility.
58	ATT pole is loose at base (soil not compacted), has loose down guy, and low cable clearance (14 feet 1 inch).	ATT is responsible utility.
58	Extenet antenna does not have 2 feet separation from guy wire, and Battery box does not have ground.	Extenet is responsible utility.
59	PG&E box does not have lock.	PG&E is responsible utility.
60	Extenet has an abandoned box on pole.	Extenet is responsible utility.

61	Extent box is missing lock, has exposed ground wire next to pole and Riser and cable are blocking climbing space.	Extenet is responsible utility.
62	Extenet underground pull box was severely damaged. Verizon called the Extenet Emergency Notification Center for repair.	Extenet is responsible utility.
63	ASTOUND cable has low clearance (16 feet) at road center.	ASTOUND is responsible utility.
63	Comcast and ATT both have improper storage of fiber cables that prevents meeting 12 inch separation between cables, and both have cables that are under strain with nearby tree branches.	Comcast and ATT are responsible utilities.
63	SONIC new pole installed 4/20/23 does not meet separation requirements with ASTOUND amplifier box and Verizon Business cable.	SONIC is responsible utility.
64	Comcast cable and messenger is not attached to pole/crossarm thus preventing meeting 12 inch separation with ATT cable. Comcast service drop has low clearance (16 feet) road center.	Comcast is responsible utility.
64	ATT service drop has low clearance (16 feet) at road center.	ATT is responsible utility.
67	Comcast service drop has low clearance (15 feet) road center.	Comcast is responsible utility.
67	ATT service drop has low clearance (14 feet) at road center.	ATT is responsible utility.
68	Comcast, ASTOUND and ATT cables are tied together.	Comcast, ASTOUND and ATT are responsible utilities.
68	ATT riser straps are damaged and ATT has dangling cable at pole.	ATT is responsible utility.
69	SONIC does not have 12 inch clearance to adjacent	SONIC is responsible utility.

	communications cables.	
69	Comcast does not have 12 inch clearance to adjacent communications cables and has low clearance (16 feet) road center.	Comcast is responsible utility.
69	ATT splice case is not properly attached, ATT cables not stapled every 3 feet, ATT cables not properly stored, ATT cable has low clearance (16 feet) road center.	ATT is responsible utility.
69	All communications cables are not grounded and all need to be transferred to new PG&E pole.	SONIC, Comcast, ASTOUND and ATT are responsible utilities.
71	SONIC and ATT need to transfer cables to new PG&E pole.	SONIC and ATT are responsible utilities.
71	PG&E insulator on guy wire is more than 6 feet from pole.	PG&E is responsible utility.
71	ATT cable has low clearance (12 feet) cable at curb.	ATT is responsible utility.
72	ATT and Comcast cables have low clearance at curb and both also have service drops low clearance at road center, and service drops do not have 12 inch separation.	ATT and Comcast are responsible utilities.
73	Comcast and SONIC cables don't meet 72 inch separation from PG&E secondary conductor and needs double guard arm.	Comcast and SONIC are responsible utilities.
73	PG&E High Voltage sign is damaged.	PG&E is responsible utility.
74	ATT and Comcast service drops have low clearance (16 feet) at road center. ATT cable further down Melendy Drive has low clearance (16 feet) at road center.	ATT and Comcast are responsible utilities.

75	PG&E pole has severe deflection at top section of pole, low guy wire clearance (17 ft Crestview Drive, low guy wire clearance (15 ft) Brittan Ave.	PG&E is responsible utility.
75	ATT lower riser is damaged and not attached to pole, copper pair bundle conduit is damaged, low cable clearance (17 ft) Crestview Drive, low cable clearance (16 ft 8 inch Brittan Ave).	ATT is responsible utility.
76	ATT cable low clearance (15 ft) at curb, and guy wire is missing insulator bob.	ATT is responsible utility.
76	Comcast cable is not attached to pole every 3 feet.	Comcast is responsible utility.
77	Comcast, ATT and PG&E have low service drop clearance (13 ft 6 inch) across road center.	Comcast, ATT and PG&E are responsible utilities.
78	ATT guy wire is loose and two guy wires are missing insulator bobs and service drop is blocking climbing space.	ATT is responsible utility.
79	Comcast exposed ground rod not 12 inch below dirt and not 2 ft from pole.	Comcast is responsible utility.
79	ATT cable low clearance (12 ft) at curb and service drop is blocking climbing space.	ATT is responsible utility.
80	PG&E pole has deflection at top section of pole, need down guy to right of pole to resolve deflection, guy wire below crossarm to Crestview Park across road is deflected/strained by tree branch.	PG&E is responsible utility.
81	Comcast has abandoned cable at pole, has low cable clearance (13 ft) at curb, and doesn't have 12 inch separation from ATT cable.	Comcast is responsible utility.
81	Zayo cable is exposed at riser guard.	Zayo is responsible utility.

81	ATT cable has low clearance (15 ft 5 inch) at curb.	ATT is responsible utility.
82	PG&E has exposed ground.	PG&E is responsible utility.
82	ATT, Comcast, ASTOUND cables have low clearance (15 ft 10 inch) road center.	ATT, Comcast, ASTOUND are responsible utilities.
82	ASTOUND and City of Atherton cables are contacting about 10 ft distance from pole.	ASTOUND and City of Atherton are responsible utilities.
82	City of Atherton fiberoptic cable is blocking climbing space.	City of Atherton is responsible utility.
82	Crown Castle insulator on guy wire is contacting vegetation above insulator.	
83	PG&E box is missing lock.	PG&E is responsible utility.
83	Comcast cable is contacting ATT cable.	Comcast is responsible utility.
83	ATT has a dangling line at pole.	ATT is responsible utility.
83	City of Atherton fiberoptic loops are contacting other communication lines.	City of Atherton is responsible utility.
85	ASTOUND cable dead ends and requires ground, ASTOUND cable does not have 12 inch separation from Crown Castle strand wire.	ASTOUND is responsible utility.
86	PG&E box is missing lock.	PG&E is responsible utility.