



May 9, 2025

Via Electronic Mail

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

Re: Audit of Verizon Communications (Verizon) Network in Imperial County

Dear Mr. Tse:

This responds to the staff's Audit Report of Verizon facilities in Imperial County. Verizon has inserted its response into the Audit Report in the attached document. We are working on remediating deviations as to Verizon's facilities within the next couple of months, and have issued third party notices where it was appropriate.

Please treat our response as confidential and the locations of the sites as confidential, pursuant to the Declarations for Confidential Treatment that we submitted earlier in this audit.

Thank you,

/s/ Jane Whang

Jane Whang

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Safety hazard notifications
- Pole-loading calculations
- Verizon's documented inspection program

II. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID	Structure Type	Location
1	20088	Wood Pole	El Centro
2	569376H	Wood Pole	El Centro
3	20087ID	Wood Pole	El Centro
4	792215H	Wood Pole	El Centro
5	20085D	Wood Pole	El Centro
6	20084D	Wood Pole	El Centro
7	24613D	Wood Pole	El Centro
8	1216302	Wood Pole	El Centro
9	20082D	Wood Pole	El Centro
10	1199845	Wood Pole	El Centro
11	200094ID	Wood Pole	El Centro
12	20095D	Wood Pole	El Centro
13	1241559	Wood Pole	El Centro
14	1243594	Wood Pole	El Centro
15	20098D	Wood Pole	El Centro
16	20099B	Wood Pole	El Centro
17	20100ID	Wood Pole	El Centro
18	29278	Wood Pole	El Centro
19	1052822D	Wood Pole	El Centro
20	29277	Wood Pole	El Centro
21	1065305	Wood Pole	El Centro
22	1246869	Wood Pole	El Centro
23	3345D	Wood Pole	El Centro
24	1246868	Wood Pole	El Centro
25	3344ID	Wood Pole	El Centro
26	1246867	Wood Pole	El Centro
27	1246866	Wood Pole	El Centro
28	3343D	Wood Pole	El Centro
29	2426D	Wood Pole	El Centro

30	1246865	Wood Pole	El Centro
31	3342ID	Wood Pole	El Centro
32	1246864	Wood Pole	El Centro
33	3341	Wood Pole	El Centro
34	1245767	Wood Pole	El Centro
35	1246863	Wood Pole	El Centro
36	3340	Wood Pole	El Centro
37	1246862	Wood Pole	El Centro
38	1246861	Wood Pole	El Centro
39	3339D	Wood Pole	El Centro
40	1203228	Wood Pole	El Centro
41	1 Pole North of 1203228	Wood Pole	El Centro
42	105	Wood Pole	El Centro
43	1 Pole North of 105	Wood Pole	El Centro
44	Corner of E Evan Hewes Hwy and Cannon Rd	Wood Pole	El Centro
45	1216679	Wood Pole	Niland
46	65092D	Wood Pole	Niland
47	1 Pole South of 65092D	Wood Pole	Niland
48	2 Poles South of 65092D	Wood Pole	Niland
49	69844D	Wood Pole	Niland
50	1 Pole South of 69844D (adjacent stub pole)	Wood Pole	Niland
51	1240382	Wood Pole	Niland
52	1 Pole South of 1240382	Wood Pole	Niland
53	1206836	Wood Pole	Niland
54	69851	Wood Pole	Niland
55	65426D	Wood Pole	Niland
56	1206834	Wood Pole	Niland
57	65425D	Wood Pole	Niland
58	65424D	Wood Pole	Niland
59	65423D	Wood Pole	Niland
60	19804D	Wood Pole	Niland
61	T9803D	Wood Pole	Niland
62	107	Wood Pole	El Centro
63	1 Pole Northeast of 107	Wood Pole	El Centro
64	1041407	Wood Pole	El Centro
65	108-1	Wood Pole	El Centro
66	1045629	Wood Pole	El Centro
67	110	Wood Pole	El Centro
68	1045628	Wood Pole	El Centro
69	111	Wood Pole	El Centro
70	112	Wood Pole	El Centro

71	113	Wood Pole	El Centro
72	113 1/2	Wood Pole	El Centro
73	114	Wood Pole	El Centro
74	115	Wood Pole	El Centro

75	1056985H	Wood Pole	El Centro
76	1 Pole East of 1056985H	Wood Pole	El Centro
77	1056987H	Wood Pole	El Centro
78	1063350H	Wood Pole	El Centro
79	1056989H	Wood Pole	El Centro
80	1048112H	Wood Pole	El Centro
81	1 Pole South of 1048112H	Wood Pole	El Centro
82	1048111D	Wood Pole	El Centro
83	200699	Wood Pole	El Centro
84	1045319	Wood Pole	El Centro
85	200698	Wood Pole	El Centro
86	200697	Wood Pole	El Centro
87	1045317	Wood Pole	El Centro
88	1045316	Wood Pole	El Centro
89	200695	Wood Pole	El Centro
90	200694	Wood Pole	El Centro
91	200693	Wood Pole	El Centro
92	200692	Wood Pole	El Centro
93	200691	Wood Pole	El Centro
94	200690	Wood Pole	El Centro
95	1048105D	Wood Pole	El Centro
96	200688	Wood Pole	El Centro
97	VL502161487	Vault	El Centro
98	VL502161486	Vault	El Centro
99	VL502161412	Vault	El Centro
100	VL502161447	Vault	El Centro
101	VL502161441	Vault	El Centro
102	1 Vault North of VL502161441	Vault	El Centro
103	PB502163073	Vault	El Centro
104	PB502163054	Vault	El Centro
105	VL502161424	Vault	El Centro
106	VL502161509	Vault	El Centro
107	VL502161478	Vault	El Centro
108	VL502161447	Vault	El Centro

III. Field Inspection – Violations List

My staff observed the following violations during the field inspection portion of the audit:

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.

The Verizon facilities on each of the following poles were not maintained for their intended use:

- 20099B – the Verizon ground wire was cut and disconnected at the crossarm

Response: The deviation will be fixed within the next month.

- 1203228 – the Verizon ground wire was cut at the public level

- **Response:** The deviation will be fixed within the next month.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8 requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

The Verizon facilities on each of the following poles had less than 12 inches of vertical clearance from a communications conductor supported on the same pole:

- Pole 20095D – a Verizon communications conductor was contacting a third-party communications conductor at midspan.

Response: Third party notice sent on 12/2/2024 to party that owns the conductor and created the deviation..

- Pole 1065305 – a Verizon communications conductor was contacting a third-party communications conductor at midspan.

- **Response:** Third party notice sent on 12/2/2024 to party that owns the conductor and created the deviation..

- Pole 3344ID – a Verizon communications conductor (splice case) was contacting a third- party communications conductor at midspan.
- **Response:** Make-ready has been completed and the deviation will be fixed within the next month.

GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be three inches.

The Verizon down guy wire attached to each of the following poles was contacting a communications conductor:

- Pole 29278 – a Verizon down guy wire was contacting a 3rd party communications conductor supported on the same pole.
- **Response:** Make-ready has been completed and the deviation will be fixed within the next month.
- Pole 19804D (79804D Per VZ records) – a Verizon down guy wire was contacting a Verizon communications conductor supported on the same pole.
- **Response:** Make-ready has been completed and the deviation will be fixed within the next month.

GO 95, Rule 54.6-B, Ground Wires, states in part:

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground moulding attached to each of the following poles was damaged:

- 20099B
- 1052822D
- 1203228

Response: These deviations will be fixed within the next month.

GO 95, Rule 84.4 –D, Clearances, From Poles and Crossarms states in part:

Table 1, Case 8, Column B specifies a minimum clearance of 15 inches from center line of pole which is applicable to communication conductors including cables and service drops. Modifications of this basic 15 inches clearance are specified in Rule 37 and by the following provisions where conductors are not on poles jointly used for supporting supply conductors excepting VIII-23 January 2020 Rule 84.4-D1b supply service drop clearance attachments (see Rules 54.8–C2 and 54.8–C3).

A Verizon communications conductor was touching each of the following poles to which it was not attached:

- A Verizon communications conductor supported on Pole 20082D was touching an adjacent stub pole which the conductor was not attached to.
- **Response:** Make-ready has been completed and the deviation will be fixed within the next month.
- A Verizon communications conductor was touching Pole 1246867 which the conductor was not attached to.
- **Response:** Make-ready has been completed and the deviation will be fixed within the next month.
- A Verizon communications conductor was touching Pole 1246864 which the conductor was not attached to.
- **Response:** Make-ready has been completed and the deviation will be fixed within the next month.

- A Verizon communications conductor was touching Pole 1246862 which the conductor was not attached to.
- **Response:** Make-ready has been completed and the deviation will be fixed within the next month.
- A Verizon communications conductor was touching a pole, 1 Pole South of 65092D, which the conductor was not attached to.
- **Response:** Make-ready has been completed and the deviation will be fixed within the next month.
- A Verizon communications conductor was touching a pole, 1 Pole South of 69844D (adjacent stub pole), which the conductor was not attached to.
- **Response:** Make-ready has been completed and the deviation will be fixed within the next month.

GO 95, Rule 84.7-A, Climbing Space, states in part:

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 on a pole, located 1 Pole northeast of 107, was obstructed by vegetation.

- **Response:** The deviation will be fixed within the next month.

GO 95, Rule 86.2, Guys, Use, states in part:

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.

The Verizon down guy wire attached to each of the following poles was not taut.

- 1216679 (also contacting 3rd party communications down guy)
- **Response:** a Third Party Notice was sent on 12/2/2024 to AT&T, which owns the down guy.
- 19804D
- **Response:** The deviation will be fixed within the next month.

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.

The following Verizon underground facilities required maintenance:

- Verizon vault VL502161487 – there was an unsecured lid with missing bolts.
- Verizon vault VL502161412 – there was an unsecured lid with missing bolts.
- Verizon vault VL502161447 – the vault was inaccessible due to being covered in dirt.

Response: These deviations will be fixed within the next month.