



March 7, 2025

Via Electronic Mail

Ricky Tse, 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 Fresno County Group

Dear Mr. Tse:

This responds to the staff's Audit Report of Verizon facilities in Fresno 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, and 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 attached Declarations for Confidential Treatment.

Thank you,

/s/ Jane Whang

Jane Whang

**CPUC AUDIT FINDINGS OF
VERIZON FRESNO GROUP SERVICE AREAS
DECEMBER 9-13, 2024**

I. Records Review

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

- Statistics for the facilities subject to GO 95 and GO 128,¹
- Service maps for Verizon equipment in Fresno, Kings, Tulare, and Merced Counties, including Graphical Information System (GIS) data,
- GO 95 and GO 128 inspection program documents,²
- Inspector training documents,
- A list of GO 95 and GO 128 inspection records,
- A list of pole loading calculations completed from October 2019 through October 2024,
- A list of new construction projects completed from October 2019 through October 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-A(2), Maintenance Programs states in part:

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.

While one of Verizon's program documents references this rule, another document provided procedures for third party notices received, but not for third party notices issued. Verizon stated that it neither issued nor received any third party notifications from October 2019 through October 2024. Table 9 in Section V below shows that ESRB staff observed approximately 72 third party violations during the field audit of 111 poles. These observations confirm that Verizon does not have procedures to notify third parties of issues on shared poles, and that Verizon is in violation of this rule.

Verizon Response: Verizon disputes this finding. Verizon provided inspection program documents that reference sending out third party notices, as part of a formal inspection. See MIS Inspection Program Document for Verizon, page 69-70 (referencing Rule 18-A(2) and A(3)). However, none of the poles (other than one wireless pole) had been inspected by the time the Audit occurred, as all of Verizon's poles in the Fresno audit group are not in High Fire Threat Districts, and were not on Verizon's inspection schedule for the past few years. Because the poles had not been inspected, Verizon had not observed the deviations found during the field audit. If it had conducted such inspections, Verizon would have sent out third party notices for the deviations as it regularly does in such cases. In prior audits, Verizon has identified and sent numerous third party notices to other attachers, consistent with the procedures in the MIS Inspection Program Document for Verizon noted above. (See, e.g., San Francisco/San Mateo Audit; Sacramento Audit).

2. 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 Verizon's inspector training program, and the qualifications of inspectors to perform inspections in compliance with GO 95. Verizon provided one document which provided a checklist for the training courses inspectors should have, but not the instructional materials referenced therein. The document provided is also only a blank template, and completed checklists for the inspectors active during the audit period were not provided. Finally, none of the documents establish how the provided checklist relates to Verizon's inspection program. For example, there are no program documents which specify that patrol and detailed inspections can only be performed by inspectors that successfully complete all the training listed on the checklist, or if any recurring training is required. Based on these findings, Verizon is in violation of this requirement to document inspector qualifications.

Verizon Response: Verizon does not agree with this finding. Verizon provided documents reflecting the checklists that Motive inspectors use in performing inspections, as well as corrective actions. In particular, the MIS Inspection Program for VZ Motive Confidential reflects training that Motive inspectors undergo for inspections. This document states at the beginning that inspections shall be established through standard procedures and that "[t]his is best realized through a standard training, current programs, and structures that implements guidelines." This document trains inspectors on identifying nonconformances in various areas, such as pole integrity and arms, hardware, lashing wire, and supports, down guys and anchors, etc. Verizon also provided a Training Checklist (attached) that indicates the training of Motive inspectors.

Verizon also requires that Motive use qualified inspectors and train employees on CPUC regulations including GO 95, as reflected in its contract with Motive. See attached **Confidential** contract at Section 20.3, and SOW with Motive, at Sections 5.1 and 6 (Wireline and Wireless).

3. 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 Verizon's documentation for its maintenance and inspection (M&I) policies, procedures, and programs, as well as records of Verizon's inspections and maintenance work orders. ESRB's review of this information revealed the following:

- Verizon's program documents do not refer to GO 95 Rule 18-B or define the minimum required data to be collected,
- Verizon's program documents and inspection records do not include a timeline for corrective actions,³
- Verizon did not provide maintenance work order records which document that corrective actions were performed.

Based on these findings, Verizon is in violation of the minimum requirements for an auditable maintenance program per Rule 18-B.

Verizon Response: Verizon disagrees with this finding. The MIS Inspection Program for VZ Motive Confidential includes a reference to Rule 18, including Rule 18-B of GO 95 and Verizon includes maintenance as a clear component of its GO 95 compliance.

For example, Verizon's contract with Motive includes reference to Rule 80.1 and maintenance of facilities pursuant to GO 95, and establishes that Motive shall provide maintenance support and/or work with Verizon's vendor that provides maintenance. See **Confidential** Contract with Motive at Section 1.4.9, and SOW, at Sections 5.2, 5.3 and Exhibit C (Wireline and Wireless). Verizon's contract with Motive requires it to maintain its work order records. In this particular audit, as noted, Verizon did not have inspections of its poles in the Fresno audit group given that this area was not High Fire Threat and not scheduled for inspections yet.

Verizon also maintains regular maintenance of its facilities on an ongoing basis and corrects issues within reasonable timeframes. See, e.g., attached **Confidential** Annual PM checklist of Verizon's wireless macro cell sites.

³ Refer to Section 3 below.

4. 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;*
- *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 Verizon 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. Verizon's inspection records include a field titled "Priority," but records indicate "2a" or "2b" without defining the letter subscripts, which are not used within this rule. And as discussed in the previous section, Verizon's documentation does not provide due dates or records of work orders used to perform corrective actions. Finally, Verizon provided inspection records for a single pole, which was inspected on Nov. 15, 2022 and again on July 16, 2024. Two issues from the 2022 inspection remained in 2024, approximately 18 months later. Corrective actions would be late unless they

were deemed Level 3 or Level 2 (4) priority per section “a” of Rule 18-B(1), and this is not specified. For these reasons, Verizon is in violation of the requirements for the timing of corrective actions.⁴

Verizon Response: Verizon does not agree with this finding. Verizon produced documents such as the MIS Inspection Program for VZ Motive Confidential document, which shows Rule 18 priority levels. (at page 71-73). Verizon’s vendor has created additional levels of priority to fix a deviation, which is attached for reference and which Motive uses as guidelines for remediating nonconformances. See attachment. Verizon’s contract and SOW with Motive also includes information about priority levels and timeframes for remediation.

With regard to the single Verizon Wireless facility that had late corrective actions, there was initially difficulty identifying the owner of other attachments on the pole, and there were also special permits required, which added time for remediation.

5. Inspection of Overhead Facilities

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.*⁵

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 Verizon 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 frequency of patrol and detailed inspections is not provided,
- The five factors required per Rule 80.1.A(2) are not addressed,
- Only one of the 1,269 poles within the boundary of this audit had a detailed inspection record,
- No records of patrol inspections were provided.

Based on these findings, Verizon is in violation with the above GO 95 inspection requirements.

Verizon Response: Verizon does not agree with this finding. Verizon's SOW requires Motive to inspect poles within the High Fire Threat Districts pursuant to the patrol and detailed inspection intervals established in GO 95, Rule 80.1. Verizon prioritizes its poles within the High Fire Threat Districts but has established a schedule for facilities in non-High Fire Threat Districts in its SOW with Motive. See attached SOW at Section 4.2 (Wireline and Wireless).

No patrol inspection records were provided, because Verizon had not inspected other poles in the audit group as the poles are not part of the High Fire Threat District and were not part of Verizon's current inspection schedule.

Verizon notes that its records do indicate the priority levels and that Motive has communicated the timeframes for fixing the deviations.

6. Maintenance of Overhead Facilities

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.

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 1-5 above focus on one component of a company's M&I program: inspections. The rule excerpts in this section address the other component: the maintenance activities and corrective actions triggered by inspections. Program documentation provided by Verizon does not address the maintenance of overhead equipment, and Verizon provided no work orders for maintenance performed as corrective actions. Therefore, Verizon violates the requirement for a maintenance program per the above rules.

Verizon Response: Verizon has maintenance programs for its poles. See response to #3 above.

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

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.

Verizon provided pole loading calculations for 12 attachment projects in Fresno, each of which includes multiple poles. In response to ESRB's request for intrusive test records, Verizon cited GO 95 Rule 80.1 and stated that it has not conducted any intrusive tests because it is not attached to any communications-only poles in Tier 3 in Fresno County. Since Verizon's M&I program documents do not refer to Rule 44.2 and no intrusive test records have been provided, Verizon is in violation of the requirements of this rule.

Verizon Response: Verizon does not agree with this finding. To the extent that Rule 44.2 applies, Verizon would comply with the requirements. However, Verizon respectfully submits that Rule 44.2 did not apply to its poles in Fresno County, as it does not have any communications-only poles in Tier 3 in that county.

8. Maintenance and Inspection of Underground Facilities GO 128, Rule 12.2, Maintenance states:

Systems shall be maintained in such condition as to secure safety 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 17.2, 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.

The M&I program documentation and records provided by Verizon include no procedures or data for underground equipment, indicating that it does not have an M&I program for underground equipment. ESRB finds that Verizon's lack of a documented M&I program for underground equipment violates the above requirements.

Verizon Response: Verizon is in the process of developing a formal written policy for underground equipment.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities in Fresno County:⁶

Table 1: Field Inspection Locations⁷

| Location # | Structure Type | Approximate Coordinates | City |
|------------|-----------------|-------------------------|--------|
| 1 | Hand Hole | | Fresno |
| 2 | Hand Hole | | Fresno |
| 3 | Hand Hole | | Fresno |
| 4 | Pole | | Fresno |
| 5 | Hand Hole | | Fresno |
| 6 | Hand Hole | | Fresno |
| 7 | Hand Hole | | Fresno |
| 8 | Pole | | Fresno |
| 9 | Pole | | Fresno |
| 10 | Pole | | Fresno |
| 11 | Pole | | Fresno |
| 12 | Pole | | Fresno |
| 13 | Pole | | Fresno |
| 14 | Pole | | Fresno |
| 15 | Pole | | Fresno |
| 16 | Pole | | Fresno |
| 17 | Pole | | Fresno |
| 18 | Pole | | Fresno |
| 19 | Pole | | Fresno |
| 20 | Pole | | Fresno |
| 21 | Pole | | Fresno |
| 22 | Pole | | Fresno |
| 23 | Pole | | Fresno |
| 24 | Pole | | Fresno |
| 25 | Hand Hole, Pole | | Fresno |
| 26 | Pole | | Fresno |
| 27 | Pole | | Fresno |
| 28 | Pole | | Fresno |
| 29 | Hand Hole, Pole | | Fresno |

⁶ This audit targeted four counties: Fresno, Tulare, Kings, and Merced. All of Verizon's facilities in Tulare, Kings, and Merced counties, and some in Fresno County, were located within the right of way of a railway or the California Aqueduct and Verizon was not able to provide access to these facilities. The field portion of this audit therefore only includes locations in the cities of Fresno and Clovis and adjacent unincorporated areas.

⁷ Locations in Fresno include unincorporated areas adjacent to or surrounded by the City of Fresno, e.g. Old Fig

Garden.

| Location # | Structure Type | Approximate Coordinates | City |
|------------|-----------------|-------------------------|--------|
| 30 | Pole | | Fresno |
| 31 | Pole | | Fresno |
| 32 | Pole | | Fresno |
| 33 | Pole | | Fresno |
| 34 | Pole | | Fresno |
| 35 | Pole | | Fresno |
| 36 | Pole | | Fresno |
| 37 | Hand Hole, Pole | | Fresno |
| 38 | Pole | | Fresno |
| 39 | Pole | | Fresno |
| 40 | Pole | | Fresno |
| 41 | Pole | | Fresno |
| 42 | Pole | | Fresno |
| 43 | Pole | | Fresno |
| 44 | Pole | | Fresno |
| 45 | Pole | | Fresno |
| 46 | Pole | | Fresno |
| 47 | Pole | | Fresno |
| 48 | Pole | | Fresno |
| 49 | Pole | | Fresno |
| 50 | Pole | | Fresno |
| 51 | Pole | | Fresno |
| 52 | Pole | | Fresno |
| 53 | Pole | | Fresno |
| 54 | Pole | | Fresno |
| 55 | Pole | | Fresno |
| 56 | Pole | | Fresno |
| 57 | Pole | | Fresno |
| 58 | Pole | | Fresno |
| 59 | Hand Hole | | Fresno |
| 60 | Pole | | Fresno |
| 61 | Pole | | Fresno |
| 62 | Hand Hole, Pole | | Fresno |
| 63 | Pole | | Fresno |
| 64 | Pole | | Fresno |
| 65 | Pole | | Fresno |
| 66 | Pole | | Fresno |
| 67 | Pole | | Fresno |

| | | | |
|----|------|--|--------|
| 68 | Pole | | Fresno |
|----|------|--|--------|

| Location # | Structure Type | Approximate Coordinates | City |
|------------|-----------------|-------------------------|--------|
| 69 | Hand Hole | | Fresno |
| 70 | Hand Hole | | Fresno |
| 71 | Pole | | Fresno |
| 72 | Hand Hole | | Fresno |
| 73 | Pole | | Fresno |
| 74 | Hand Hole, Pole | | Fresno |
| 75 | Pole | | Fresno |
| 76 | Pole | | Fresno |
| 77 | Pole | | Fresno |
| 78 | Pole | | Fresno |
| 79 | Pole | | Fresno |
| 80 | Pole | | Fresno |
| 81 | Pole | | Fresno |
| 82 | Hand Hole, Pole | | Fresno |
| 83 | Pole | | Fresno |
| 84 | Hand Hole, Pole | | Clovis |
| 85 | Pole | | Clovis |
| 86 | Pole | | Clovis |
| 87 | Pole | | Clovis |
| 88 | Hand Hole, Pole | | Clovis |
| 89 | Pole | | Clovis |
| 90 | Pole | | Clovis |
| 91 | Pole | | Clovis |
| 92 | Pole | | Clovis |
| 93 | Pole | | Clovis |
| 94 | Pole | | Clovis |
| 95 | Pole | | Clovis |
| 96 | Pole | | Clovis |
| 97 | Pole | | Clovis |
| 98 | Pole | | Clovis |
| 99 | Hand Hole, Pole | | Clovis |
| 100 | Pole | | Clovis |
| 101 | Hand Hole, Pole | | Clovis |
| 102 | Pole | | Clovis |
| 103 | Pole | | Clovis |
| 104 | Hand Hole, Pole | | Fresno |

| | | | |
|-----|------|--|--------|
| 105 | Pole | | Fresno |
| 106 | Pole | | Fresno |
| 107 | Pole | | Fresno |

| Location # | Structure Type | Approximate Coordinates | City |
|------------|-----------------|-------------------------|--------|
| 108 | Pole | | Fresno |
| 109 | Pole | | Fresno |
| 110 | Hand Hole, Pole | | Fresno |
| 111 | Pole | | Fresno |
| 112 | Pole | | Fresno |
| 113 | Pole | | Fresno |
| 114 | Pole | | Fresno |
| 115 | Pole | | Fresno |
| 116 | Hand Hole, Pole | | Fresno |
| 117 | Pole | | Fresno |
| 118 | Pole | | Fresno |
| 119 | Pole | | Fresno |
| 120 | Pole | | Fresno |
| 121 | Pole | | Fresno |

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:

Verizon Response: Verizon is in the process of working to remediate the deviations within the next month or two.

Table 2: GO 128, Rule 17.1 Findings

| Location | Findings |
|----------|---|
| 69 | Tracer not grounded (required per Verizon staff). |
| 72 | Tracer not grounded (required per Verizon staff) |
| 116 | Exposed tracer wire. |

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

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

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.

ESRB's findings related to the above rule are listed in Table 3:

Verizon Response: Verizon is in the process of working to remediate the deviations within the next month or two for location 61. Verizon disputes the finding for location 119, as noted below. Verizon identified some discrepancies in its internal database due to entry of locations where construction had been planned, but ultimately not completed; this is the reason that certain poles were in Verizon's GIS map but Verizon was not actually located at the poles in the field review.

Table 3: GO 95, Rule 31.1 Findings

| Location | Findings |
|----------|---|
| 4 | Pole included in GIS map, but Verizon not attached. |
| 7 | GIS map shows handhole and pole at this location, but no pole. |
| 8 | Pole included in GIS map, but Verizon not attached. |
| 9 | Pole included in GIS map, but Verizon not attached. |
| 61 | Verizon attached to buddy pole rather than new pole. |
| 94 | GIS shows a second pole north of this location at E. Shepherd Ave, but it isn't here. |
| 119 | Verizon attached to buddy pole rather than new pole. <i>Verizon disputes this finding; it is not attached to the buddy pole. PGE was sent a third party notice for the buddy pole.</i> |

3. GO 95, Rule 35, Vegetation Management states 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 4:

Verizon Response: Verizon is in the process of working to remediate the deviations within the next month or two.

Table 4: GO 95, Rule 35 Findings

| Location | Findings |
|----------|--|
| 60 | Verizon cable was in contact with a tree and showed signs of abrasion. |
| 94 | Vegetation contacting cable resulting in broken lashing. |

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.

Table 1, Case 10B: Radial centerline clearance of conductor or cable (unattached) from non-climbable street lighting or traffic signal poles or standards, including mastarms, brackets and lighting fixtures, and from antennas that are not part of the overhead line system must be at least 1 foot.

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

Verizon Response: Verizon is in the process of working to remediate the deviation within the next month or two.

Table 5: GO 95, Rule 37 Findings

| Location | Findings |
|----------|--|
| 44 | Verizon cable is approximately 3 inches from streetlight pole. |

5. 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 6:

Verizon Response: Although Verizon is not certain that there was an issue with Location 50, Verizon will review and remediate the pole if the deviation exists for its equipment. Verizon is in the process of working to remediate deviation at Location 19.

Table 6: GO 95, Rule 84.6.B Findings

| Location | Findings |
|----------|---|
| 19 | Ground wire for Verizon equipment is exposed. |
| 50 | Ground wire for Verizon equipment is exposed. |

6. 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 7:

Verizon Response: Verizon is in the process of working to remediate the deviations within the next month or two.

Table 7: GO 95, Rule 86.2 Findings

| Location | Findings |
|----------|---|
| 20 | Slack guy wires supporting Verizon equipment. |
| 117 | Slack guy wires supporting Verizon equipment. |

7. 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 gro

und 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 8:

Verizon Response: Verizon is in the process of working to remediate the deviations within the next month or two.

Table 8: GO 95, Rules 84.6-D and 87.7 Findings

| Location | Findings |
|-----------------|---|
| 71 | Riser cover does not extend to 8 feet high. |
| 73 | Riser cover does not extend to the ground. |
| 99 | Loose riser cover. |

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

Verizon Response: See responses inserted below into the table, documenting the issuance of third party notices.

Table 9: Third Party Observations

| Location # | Findings |
|------------|--|
| 4 | PG&E: high-visibility strips on pole painted over. Sent third party notice on 2-24-25 |
| 10 | Comcast: vegetation strain/abrasion on cable. Sent third party notice on 1-4-25 |
| 13 | AT&T: missing down guy guard and exposed ground rod. Sent third party notice on 1-4-25 |
| 14 | Comcast: loose down guy. Sent third party notice on 1-4-25 |
| 14 | AT&T: ground wire cut and section missing; loose down guy. Sent third party notice on 1-4-25 |
| 16 | PG&E: loose down guy. Sent third party notice on 1-4-25 |
| 19 | Comcast: riser cover not secured. Sent third party notice on 1-4-25 |
| 22 | PG&E: broken ground wire cover with exposed wire. Sent third party notice on 2-24-25 |
| 23 | Comcast: broken ground wire cover. Sent third party notice on 1-4-25 |

| Location # | Findings |
|------------|--|
| 23 | PG&E: damaged/decayed pole. Sent third party notice on 1-4-25 |
| 24 | PG&E: damaged/decayed pole (has red tag,) Sent third party notice on 1-4-25 |
| 25 | PG&E: fiber contacting Comcast at midspan and vibrating/oscillating even though no wind. Sent third party notice on 1-4-25 |
| 27 | PG&E: neutral conductor touching service drop and cross arm. Sent third party notice on 1-4-25 |
| 28 | PG&E: broken ground wire cover with exposed wire. Sent third party notice on 1-4-25 |
| 30 | PG&E: bare neutral conductor contacting tree. Sent third party notice on 1-4-25 |
| 31 | AT&T and Comcast: missing ground wire cover with exposed wire. Sent third party notice on 1-4-25 |

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|----|---|
| 37 | AT&T: damaged pole. Sent third party notice on 1-4-25 |
| 40 | AT&T and Comcast: cables are less than 12 inches from streetlight. Sent third party notice on 1-4-25 |
| 42 | AT&T: cable has vegetation strain/abrasion. Sent third party notice on 1-4-25 |
| 42 | AT&T and Comcast: cables contacting each other. Sent third party notice on 1-4-25 |
| 44 | AT&T and Comcast: cables contacting streetlight. Sent third party notice on 1-4-25 |
| 46 | Comcast: Cable touching streetlight. Sent third party notice on 1-4-25 |
| 47 | PG&E: damaged high voltage signs. Sent third party notice on 1-4-25 |
| 48 | PG&E: damaged high voltage sign. Sent third party notice on 1-4-25 |
| 49 | PG&E: missing high voltage sign on top cross arm. Sent third party notice on 1-4-25 |
| 49 | Comcast: cable contacting down guy and AT&T cable. Sent third party notice on 1-4-25 |
| 50 | PG&E: missing high voltage sign. Sent third party notice on 1-4-25 |
| 52 | AT&T: missing down guy guards. Sent third party notice on 1-4-25 |
| 55 | PG&E: damaged high voltage sign. Sent third party notice on 1-4-25 |
| 56 | PG&E: pole top fire caused significant missing section of wood and high-visibility strips on pole painted over. Sent third party notice on 1-4-25 |
| 57 | PG&E: down guy deflected by vegetation. Sent third party notice on 1-4-25 |
| 58 | PG&E: pole degraded; missing high voltage sign; insulator pin through bolt backing out/loose. Sent third party notice on 1-4-25 |
| 60 | PG&E: missing high voltage sign. Sent third party notice on 1-4-25 |
| 60 | AT&T: vegetation causing cable strain/abrasion. Sent third party notice on 2-24-25 |
| 61 | AT&T: attached to buddy pole rather than new pole Sent third party notice on 2-24-25 |

| Location # | Findings |
|------------|---|
| 62 | Comcast: exposed ground wire. Sent third party notice on 1-4-25 |
| 63 | Comcast: riser unsecured and ground wire not covered. Sent third party notice on 1-4-25 |

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|-----|--|
| 64 | Comcast: unsecured and cut riser cover. Sent third party notice on 1-4-25 |
| 68 | Comcast: down guy guard missing. Sent third party notice on 2-24-25 |
| 68 | AT&T: down guy guard missing. Sent third party notice on 2-24-25 |
| 68 | PG&E: bare secondary conductor contacting streetlight. Sent third party notice on 1-4-25 |
| 68 | Comcast: cable contacting streetlight. Sent third party notice on 1-4-25 |
| 71 | Comcast: idle coax cable. Sent third party notice on 1-4-25 |
| 71 | AT&T: riser cover less than 8 feet above grade. Sent third party notice on 2-24-25 |
| 74 | AT&T: unsecured ground wire cover and ground wire cut. Sent third party notice on 2-24-25 |
| 74 | Comcast: idle cable between poles is contacting AT&T mid-span. Sent third party notice on 1-4-25 |
| 79 | Comcast: ground wire not covered above 8 feet and ground molding not secured. Sent amended third party notice on 3/7/25 |
| 80 | PG&E: switch handle rod touching AT&T line. Sent third party notice on 1-4-25 |
| 81 | PG&E: cross arm is loose causing jumpers to be taut. Sent third party notice on 1-4-25 |
| 83 | AT&T: cut ground wire. Sent third party notice on 1-4-25 |
| 86 | AT&T: cut ground wire. Sent third party notice on 1-4-25 |
| 89 | PG&E: broken primary insulator. Sent third party notice on 1-4-25 |
| 92 | PG&E: span guy touching Comcast cable. Sent third party notice on 1-4-25 |
| 97 | PG&E: SCADA control cables from switch touching Verizon cable. Sent third party notice on 1-4-25 |
| 99 | AT&T: loose riser cover, exposed ground rod, unsupported splice box. Sent third party notice on 1-4-25 |
| 100 | PG&E: service tri-plex and neutral conductor touching. Sent third party notice on 1-4-25 |
| 103 | AT&T: uncovered riser cable and low service drop. Sent third party notice on 1-4-25 |
| 108 | Comcast: one service drop resting on tree branch and pushed down by tree; another service drop is tied to PG&E service drop for support. Sent third party notice on 1-4-25 |
| 109 | PG&E: ground wire and cover damaged. Sent third party notice on 1-4-25 |

| | |
|-----|---|
| 109 | Comcast: service drops tied to PG&E service drop for support. Sent third party notice on 1-4-25 |
| 110 | Comcast: cable intermittent contact with PG&E down guy. Sent third party notice on 1-4-25 |

| Location # | Findings |
|------------|--|
| 112 | AT&T: idle service drops on ground and cable running through dense vegetation. Sent third party notice on 1-4-25 |
| 114 | Comcast: broken lashing wire. Sent third party notice on 1-4-25 |
| 114 | PG&E: security cameras attached to pole (wired to adjacent business.) Sent third party notice on 1-4-25 |
| 115 | PG&E: horizontal primary insulator damaged: missing top half. Sent third party notice on 1-4-25 |
| 116 | PG&E: secondary conductor came off insulator and resting on streetlight with "Marks Ave" sign. Sent third party notice on 1-4-25 |
| 117 | PG&E: damaged high-visibility strips. Sent third party notice on 1-4-25 |
| 117 | Comcast: cable contacting streetlight and slack down guy. Sent third party notice on 1-4-25 |
| 119 | Comcast: attached to buddy pole rather than new pole. Sent third party notice on 1-4-25 to PGE –Comcast is NOT attached to the Buddy pole. |
| 119 | PG&E: low rung. Sent third party notice on 1-4-25 |
| 120 | AT&T: broken ground wire cover. Sent third party notice on 1-4-25 |
| 121 | PG&E: pole degraded, missing high voltage sign, crossarm crooked due to loose or damaged hardware. Sent third party notice on 1-4-25 |