verizon

July 3, 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 Kern County Group

Dear Mr. Daye:

This responds to the staff's Audit Report of Verizon facilities in Kern 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/ John Gavin

John Gavin

CPUC AUDIT FINDINGS OF VERIZON KERN GROUP SERVICE AREAS MARCH 10-14, 2025

I. Records Review

During the audit, ERSB 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 Violations

ERSB observed the following violations during the field inspection portion of the audit:

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

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

Verizon's facilities on the following poles required maintenance:

• Pole location with Latitude 35.779128, Longitude -119.236561 near Delano High School: the pole had erosion at the foundation of the pole.

Verizon Response: Verizon Wireless NorCal work has been completed as of 6/10/25

• Pole 121291829: a "buddy pole" was left approximately a foot away from the pole.

Verizon Response: 3rd Party letter sent 3/20/25 to Zayo. Verizon Business will transfer facilities to the new pole within the next couple of months.

2) GO 95, Rule 31.6, Abandoned Lines, states in part:

Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property.

A permanently abandoned anchor guard on pole next to Pole 122081533 was not removed.

Verizon Response: The anchor guard is not for Verizon's equipment. 3rd Party letters were sent on 3/20/25 to Charter and AT&T.

3) GO 95, Rule 84.4-D4a [Clearances] From Nonclimbable Street Lighting or Traffic Signal Poles or Standards (including mastarms, brackets, and lighting fixtures) states:

When passing street lighting, traffic signal poles or standards (including mastarms, brackets and lighting fixtures) a clearance of 12 inches, as specified in Table 1, Case 10, Column B, may be reduced when suitable insulation for the highest voltage of open wire involved and mechanical protection from abrasion is provided where necessary. Such mechanical protection shall extend not less than 15 inches in each direction from centerline of pole, standard, attaching mastarm or fixture, whether passing above, below or alongside.

A communications conductor supported on Pole 122081533 was touching a traffic signal pole.

Verizon Response: Verizon Business is working to remediate this finding within the next two months.

4) GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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 supporting Pole 121307957 was not taut.

Verizon Response: The down guy wire is not Verizon's. A 3rd Party letter was sent on 3/20/25 to Crown/Sunesys.

5) GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Case 8, Column C

requires the minimum vertical separation between communications conductors on separate crossarms or other supports at different levels on the same pole and in adjoining midspans to be 12 inches.

The vertical separation between Verizon communications facilities and a third-party communications conductor on each of the following poles was less than 12 inches:

• 3 Poles East of Pole 122081548:

Verizon Response:

Upon investigation it appears a third party created the deviation and notices were sent accordingly.

- Pole 110529513; No Verizon Business Deviation, 3rd party letter sent on 3/20/25 to PG&E.
- Pole 110364613; No Verizon Business Deviation, 3rd party letter sent on 3/20/25 to AT&T.

• Pole 120043118; No Verizon Business Deviation,. 3rd Party letter sent on 3/20/25 to Zayo.

6) 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).

Verizon's facilities on the following poles had damaged ground moulding: Pole 121488574, Pole in front of Cricket/Papa Johns:

Verizon Response:

- Pole 121488574; Verizon Business is working to remediate this within the next two months.
- Pole in front of Cricket/Papa Johns, near White Lane, Bakersfield; Verizon is working to remediate this within the next two months.

7) GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:

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.

Verizon's facilities on the following handhole were inaccessible due to vegetation or clogged cover:

Verizon Response: Verizon Business is working to remediate these within the next two months.

- ACPT:HH::142287449
- ACPT:HH::142287552
- ACPT:HH::501339735
- ACPT:VL::502170393
- ACPT:HH::501339634
- ACPT:PB::501618240
- ACPT:PB::501618480

III. Field Inspection

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

Table 1: Field Inspection Locations

No.	Structure ID.	Type of Structure	Location
1	120410837	Pole	Bakersfield
2	120130806	Pole	Bakersfield
3	120043118	Pole	Bakersfield
4	1 Pole South of 120043118	Pole	Bakersfield
5	121291829	Pole	Bakersfield
6	121214027	Pole	Bakersfield
7	1 Pole South of 121214027	Pole	Bakersfield
8	2 Pole South of 121214027	Pole	Bakersfield
9	3 Pole South of 121214027	Pole	Bakersfield
10	121488574	Pole	Bakersfield
11	1 Pole South of 121488574	Pole	Bakersfield
12	2 Pole South of 121488574	Pole	Bakersfield
13	121163674	Pole	Bakersfield
	·		

14	1 Pole South of 121163674	Pole	Bakersfield
15	2 Pole South of 121163674	Pole	Bakersfield
16	121052521	Pole	Bakersfield
17	1 Pole South of 121052521	Pole	Bakersfield
18	121163676	Pole	Bakersfield
19	110480650	Pole	Bakersfield
20	122112587	Pole	Bakersfield
21	ACPTPB501457367	Vault	Bakersfield
22	110364258	Pole	Bakersfield
23	110529510	Pole	Bakersfield
24	110364680	Pole	Bakersfield
25	110364679	Pole	Bakersfield
26	110529506	Pole	Bakersfield
27	110364613	Pole	Bakersfield