

AT&T'S RESPONSE TO AUDIT RELATED TO PLACER, EL DORADO, AND AMADOR  
COUNTIES REGION CONDUCTED

June 2 – June 6, 2025

**Alleged Records Violation #1A:** ESRB's review of AT&T's overhead work orders from March 1, 2020, through February 28, 2025, found that 5,251 out of 26,530 (or 19.8%) work orders are late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their priority level, and late-closed work orders are work orders that were completed past their assigned due date based on their priority level. ESRB's analysis found that 4,717 work orders (3,535 late pending and 1,182 closed) are more than 60 days past due. Table 1 below breaks down the 5,251 late overhead work orders by priority level.

**Table 1: Late Overhead Facility Work Orders**

Priority Level	Late-Pending Work Orders	Late- Complete Work Orders	Total Late Work Orders	Total Tags Created	Percentage Late
1	0	105	105	139	75.5%
2	1,897	1,217	3,114	7,705	40.4%
2a	502	14	516	621	83.1%
2b	897	366	1,263	2,516	50.2%
2c	241	12	253	287	88.2%
3	0	0	0	15,262	0%
<b>Total</b>	<b>3,537</b>	<b>1,714</b>	<b>5,251</b>	<b>26,530</b>	<b>19.8%</b>

**AT&T Response:** Without admitting that AT&T violated GO 95, Rule 18, the information AT&T produced in response to the pre-audit data request appears to indicate that 3537 tickets are pending late and 1714 were closed late; however, that does not necessarily mean that any related corrective action had not been completed by the assigned due date. Closing repair tickets is a time-consuming manual process. That said, AT&T has been reviewing and is continuing to review each of the 3537 work orders identified as past due to determine whether the work order should be cancelled/invalidated or require work to be performed in the field. To date, 845 have been completed or cancelled therefore considered closed. AT&T intends to complete current and past due work orders that require work to be performed in the field.

**Alleged Records Violation #1B:** The most overdue pending work orders are listed in Table 2 below:

**Table 2: Most Overdue Pending Facility Work Orders**

Work Order Package ID	Priority	HFTD Tier <sup>2</sup>	Creation Date	Due Date	Number of Days Late <sup>3</sup>
772281	2b	3	2/2/2021	4/23/2021	1407
772316	2b	3	2/2/2021	4/23/2021	1407
772282	2b	3	2/2/2021	4/23/2021	1407
768400	2c	3	1/30/2021	4/28/2021	1402
768395	2c	3	1/30/2021	4/28/2021	1402
772318	2c	3	2/2/2021	4/29/2021	1401
627991	2b	2	5/6/2020	5/6/2021	1394
785857	2b	2	2/25/2021	11/6/2021	1210
910441	2b	2	9/8/2021	5/12/2022	1023

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772195	2a	3	2/2/2021	10/28/2021	1219
772196	2a	3	2/2/2021	10/30/2021	1217
773390	2a	3	2/3/2021	11/4/2021	1212
642489	2	1	5/26/2020	5/26/2023	644
675967	2	1	7/22/2020	7/22/2023	587
681664	2	1	8/7/2020	8/7/2023	571

**AT&T Response:** Without admitting any violations of GO 95, AT&T reports that tickets 772281, 772316, 772282, 785857, 627991, 772195, 772196, and 773390 were assigned to a third party for completion by 6/25/21. AT&T is currently verifying whether the work has been completed. The work for ticket 627991 was finished, and the ticket was closed on 6/9/2025. For any tickets where work remains unfinished, all outstanding tasks are scheduled to be completed by 9/30/2025, after which those tickets will be closed.

**Alleged Records Violation #2** ESRB's review of AT&T's underground work orders from March 1, 2020, through February 28, 2025, found that three (3) out of 80 (or 3.7%) underground work orders were completed past their assigned due date. Table 3 below breaks down the three (3) late underground work orders.

**Table 3: Late Underground Facility Work Orders**

	<b>Late-Pending Work Orders<sup>5</sup></b>	<b>Late- Complete Work Orders</b>	<b>Total Late Work Orders</b>	<b>Total Tags Created</b>	<b>Percentage Late</b>
<b>Total</b>	0	3	3	80	3.7%

**AT&T Response:** Without admitting that AT&T violated GO 128, Rule 17.1, the date a ticket was closed is not necessarily indicative of when any corrective action was completed.

**Alleged Records Violation #3A:** ESRB's review of AT&T's Inspection History from March 1, 2020, through February 28, 2025, found that 441 Distribution Area (DA) inspections were completed past their required reinspection date. This includes 247 of 248 DAs in Tier 3 areas. Each DA is composed of 75 facilities on average. Table 4 below breaks down the 441 late inspections by HFTD Tier.

Table 4: Late Distribution Area (DA) Inspections by HFTD Tier

<b>HFTD</b>	<b>Late DA Inspections</b>	<b>Total DA Inspections</b>	<b>Percentage Late</b>
Tier 2	194	1,563	12.4%
Tier 3	247	1,239	19.9%
<b>Total</b>	<b>441</b>	<b>2,802</b>	<b>15.7%</b>

**AT&T Response:** Without admitting that AT&T violated GO 95, Rule 80.1-A (1), AT&T will endeavor to meet due dates moving forward.



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**Alleged Records Violation #3B:** The latest patrol inspections are listed in Table 5 below:

Table 5: Late Facility Inspections

UN_DA_NA	CLLI_ID	HFTD Tier	Inspection Date	Next Inspection Due Date	Next Inspection Date	Number of Days Late
NGE221101	GRTWCA11	3	4/7/2022	8/1/2023	12/13/2023	134
NPZ120340	PLVLCA11	3	4/4/2022	8/1/2023	12/5/2023	126
NPZ0898	PLVLCA11	3	4/6/2022	8/1/2023	12/6/2023	127
NGE320201	GRTWCA11	2	5/11/2021	9/1/2023	12/5/2023	95
NPZ640340	PLVLCA11	2	5/22/2021	9/1/2023	12/3/2023	93

**AT&T Response:** Without admitting that AT&T violated GO 95, Rule 80.1-A(1), AT&T will endeavor to meet due dates moving forward.

**Alleged Violation 4:** **\*START CONFIDENTIAL\*\*\***

[REDACTED]

**\*\*\*END**

**CONFIDENTIAL\*** (Bold type added by CPUC for emphasis). **\*START  
CONFIDENTIAL\*\*\***

[REDACTED]

**\*\*\*END CONFIDENTIAL\***

**PROPRIETARY AND CONFIDENTIAL INFORMATION** under California Government  
Code § 7927.705; California Evidence Code §1060; California Civil Code §3426 et seq.; 18  
U.S.C Chapter 90 et seq.; **MAY NOT BE DISCLOSED PURSUANT TO CALIFORNIA  
PUBLIC UTILITIES CODE SECTION 583. See the September 18, 2025 Declaration of Saira  
Pasha.**

**AT&T Response:** Without admitting that AT&T violated GO 95 Rule 80.1A, **\*START  
CONFIDENTIAL\*\*\***

[REDACTED]

**\*\*END CONFIDENTIAL\***

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**PROPRIETARY AND CONFIDENTIAL INFORMATION under California Government Code § 7927.705; California Evidence Code §1060; California Civil Code §3426 et seq.; 18 U.S.C Chapter 90 et seq.; MAY NOT BE DISCLOSED PURSUANT TO CALIFORNIA PUBLIC UTILITIES CODE SECTION 583. See the September 18, 2025 Declaration of Saira Pasha**

**Alleged Violation 5A:** AT&T's inspection data provided to ESRB does not identify the inspection personnel who performed each inspection.

**AT&T Response:** AT&T respectfully disagrees with the statement. AT&T furnished a complete list of inspectors employed by the vendor Osmose, who conducted the inspections with the pre-audit data information submitted to ESRB in or around May 2025.

**Alleged Violation 5B:** AT&T incorrectly documented the status of Package ID 957082, MarkIt ID 100417492, insufficient clearance from communication to supply conductors. AT&T has recorded the corrective action to be completed. Observations during the field audit found that the work had not been completed

**AT&T Response:** Without admitting that AT&T violated GO 95, the site was not accessible due to snow and should not have been closed until it was completed. AT&T reviewed the proper steps for handling this specific circumstance in the future with the technician. Ticket 1743579 was created to replace Ticket 957082 and is scheduled to be completed and closed by 9/30/2025.

**Alleged Field Violations #1: GO 95, Rule 12.2 Maintenance of Lines**

Location #	Finding
29	Broken lashing below supply lines

**AT&T Response:**

- Location # 29: Ticket 1734475 has a due date of 10/03/2026.

**Alleged Field Violations #2: GO 95, Rule 31.1, Design, Construction and Maintenance**

Location #	Findings
22	Facilities require transfer to new pole
31	Facilities require transfer to new pole
37	Down guy anchor head below grade

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47	Facilities require transfer to new pole
54	Facilities require transfer to new pole
71	Down guy anchor head below grade
75	Facilities require transfer to new pole
76	Facilities require transfer to new pole
78	Facilities require transfer to new pole
89	Facilities require transfer to new pole (AT&T has an existing work order to complete this work)
90	Facilities require transfer to new pole (AT&T has an existing work order to complete this work)
102	Missing junction box cover
108	Open terminal enclosure (AT&T has an existing work order to complete this work)

**AT&T Response:**

- Location #22: Ticket 962356 has a due date of 7/19/2026.
- Location #31: Ticket 1492728 has a due date of 4/10/2029.
- Location #37: Ticket 1743575 was created for the alleged finding with a due date of 8/25/2030.
- Location #47: Ticket 772637 has a due date of 10/23/2025.
- Location #54: Ticket 1743581 was created for the alleged finding with a due date of 8/25/2030.
- Location #71: Ticket 1012168 has a due date of 11/14/2026.
- Location #75: Ticket 1720275 has a due date of 07/07/2030.
- Location #76: the required work associated with Ticket 1720274 was completed; therefore, the ticket was closed on 8/12/2025.
- Location #78: corrective action for Ticket 1014657 is scheduled to be completed by 11/15/2025.
- Location #89: the required work associated with Ticket 1675575 was completed; therefore, the ticket was closed on 8/12/2025.
- Location #90: the required work associated with Ticket 1015653 was completed; therefore, the ticket was closed on 8/12/2025.
- Location #102: Ticket 1744034 was created for the alleged finding with a due date of 8/25/2030.
- Location #108: Ticket 1406883 has a due date of 10/11/2028.

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**Alleged Field Violations #3: GO 95, Rule 31.6, Abandoned Lines**

Location #	Findings
19	Abandoned line
48	Abandoned line

**AT&T Response:**

- Location #19: Ticket 1743189 was created for the alleged finding with a due date of 8/25/2028.
- Location #48: Ticket 1743572 was created for the alleged finding with a due date of 8/25/2030.

**Alleged Field Violations #4: GO 95, Rule 37 Case 3 Low Clearance**

Location #	Finding
65	Low clearance over center of road, 13 feet
72	Low clearance over center of road, 15 feet
102	Low clearance over edge of road, 13 feet.

**AT&T Response:**

- Location #65: corrective action for Ticket 1608711 is scheduled to be completed by 10/15/2025.
- Location #72: Ticket 1388262 has a due date of 11/01/2028.
- Location #102: Ticket 101052850 was created for the alleged finding with a due date of 8/30/2030.

**Alleged Field Violations #5: GO 95, Rule 37, Table 1, Case 5**

Location #	Findings
23	Line down on ground
24	Line down on ground



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25	Line down on ground
39	Line down on ground

**AT&T Response:**

- Location #23: Ticket 1743190 was created for the alleged finding with a due date of 8/26/2030.
- Location #24: Ticket 1734829 has a due date of 7/20/2028.
- Location #25: Ticket 1743192 was created for the alleged finding with a due date of 8/26/2028.
- Location #39: Ticket 1743584 was created for the alleged finding with a due date of 8/26/2028.

**Alleged Field Violations #6: GO 95, Rule 37, Table 1, Case 6**

Location #	Finding
99	Line down contacting roof.

**AT&T Response:**

- Location #99: Ticket 1744033 was created for the alleged finding with a due date of 8/26/2030.

**Alleged Field Violations #7: GO 95, Rule 38, Table 2, Case 8**

Location #	Finding
65	Communication conductors bundled with rope to other communication conductors.

**AT&T Response:**

- Location #65: Ticket 1743719 was created for the alleged finding with a due date of 8/25/2030.

**Alleged Field Violations #8: GO 95, Rule 38, Table 2, Case 19-C**

Location #	Findings
75	Service drop is wrapped around the down guy.

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112	Communication line is contacting down guy.
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**AT&T Response:**

- Location #75: Ticket 1743855 was created for the alleged finding with a due date of 8/26/2030.
- Location #112: Ticket 1744037 was created for the alleged finding with a due date of 8/26/2030.

**Alleged Field Violations #9: GO 95, Rule 44.3, Safety Factors**

Location #	Findings
41	Horizontal crack at base
68	Cracked pole
90	Broken pole at base

**AT&T Response:**

- Location #41: Ticket 1743571 was created for the alleged findings and has a due date of 2/25/2026.
- Location #68: The required work associated with Ticket 1717247 was completed; therefore, the ticket was closed on 9/3/2025.
- Location #90: The required work associated with Ticket 1015653 was completed; therefore, the ticket was closed on 8/12/2025.

**Alleged Field Violations #10: GO 95, Rule 49.1-A(1), Poles, Towers and Other Structures, Strength**

Location #	Findings
18	Pole top is split, loose hardware.
69	Excessive woodpecker holes.

**AT&T Response:**

- Location #18: Ticket 1743188 was created for the alleged finding with a due date of 2/26/2026.
- Location #69: Ticket 1743854 was created for the alleged finding with a due date of 2/26/2026.



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**Alleged Field Violations #11: GO 95, Rule 56.6 D, Guys Exposed to 22,500 Volts or More**

Location #	Finding
24	Down guy exposed to transmission conductor is sectionalized with an insulator bob.

**AT&T Response:**

- Location #24: Ticket 1743191 was created for the alleged finding with a due date of 8/14/2030.

**Alleged Field Violations #12: GO 95, Rule 81.6, Stepping**

Location #	Finding
95	Low pole step

**AT&T Response:**

- Location #95: Ticket 1518675 has a due date of 4/24/2029.

**Alleged Field Violations #13: GO 95, Rule 84.6-B Ground Wires**

Location #	Findings
19	Exposed ground conductor.
23	Exposed ground conductor.
47	Exposed ground conductor.
51	Exposed ground conductor.
54	Exposed ground conductor.
70	Exposed ground conductor.
76	Exposed ground conductor.

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**AT&T Response:**

- Location #19: Ticket 1743189 was created for the alleged finding with a due date of 8/26/2028.
- Location #23: Ticket 1743190 was created for the alleged finding with a due date of 8/26/2030.
- Location #47: Corrective action for Ticket 936757 is scheduled to be completed by 10/15/2025
- Location #51: Ticket 1743599 was created for the alleged finding with a due date of 8/25/2028.
- Location #54: Ticket 1743598 was created for the alleged finding with a due date of 8/25/2028.
- Location #70: Ticket 1743868 was created for the alleged finding with a due date of 8/26/2028.
- Location #76: The required work associated with Ticket 1720274 was completed; therefore, the ticket was closed on 8/12/2025.

**Alleged Field Violations #14: GO 95, Rule 84.6-D Vertical Runs**

Location #	Findings
23	Loose vertical cables, >24" between supports
39	Loose vertical cables, >24" between supports
40	Loose vertical cables, >24" between supports
74	Loose vertical cables, >24" between supports
80	Loose vertical cables, >24" between supports
86	Loose vertical cables, >24" between supports

**AT&T Response:**

- Location #23: Ticket 1743190 was created for the alleged finding with a due date of 8/26/2030.
- Location #39: Ticket 1743584 was created for the alleged finding with a due date of 8/26/2028.
- Location #40: Corrective action for Ticket 962223 is scheduled to be completed by 10/15/2025.
- Location #74: Corrective action for Ticket 1017610 is scheduled to be completed by 10/15/2025.
- Location #80: Ticket 1744046 was created for the alleged finding with a due date of

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8/26/2028.

- Location #86: Ticket 1743868 was created for the alleged finding with a due date of 8/26/2028.

**Alleged Field Violations #15: GO 95, Rule 86.2, Guys**

Location #	Findings
14	Slack down guy (Existing AT&T work order to complete this work)
36	Slack down guy
38	Slack down guy
95	Slack down guy
112	Slack down guy

**AT&T Response:**

- Location #14: Corrective action for Ticket 1115958 is scheduled to be completed by 10/15/2025.
- Location #36: Ticket 1743577 was created for the alleged finding with a due date of 8/25/2030.
- Location #38: Ticket 1743576 was created for the alleged finding with a due date of 8/25/2030.
- Location #95: Ticket 1518675 has a due date of 4/24/2029.
- Location #115: Ticket 1744037 was created for the alleged finding with a due date of 8/26/2030.

**Alleged Field Violations #16: GO 95, Rule 86.9, Guy Marker (Guy Guard)**

Location #	Findings
16	Missing down guy marker
18	Damaged down guy marker
47	Missing down guy marker
71	Missing down guy marker



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116	Missing down guy marker
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**AT&T Response:**

- Location #16: Corrective action for Ticket 962302 is scheduled to be completed by 10/15/2025.
- Location #18: Ticket 1734569 has a due date of 7/17/2030.
- Location #47: Corrective action for Ticket 936757 is scheduled to be completed by 10/15/2025.
- Location #71: Ticket 1012168 has a due date of 11/14/2026.
- Location #116: Ticket 1744036 was created for the alleged finding with a due date of 8/26/2030.

**Alleged Field Violations #17: GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet Above the Ground**

Location #	Findings
16	Unsecured riser cover.
17	Riser cover lifted from pole.
23	Riser cover lifted from pole.
30	Unsecured riser cover.
40	Riser cover lifted from pole (AT&T has an existing work order to complete this work)
48	Missing/damaged riser cover.
54	Missing/damaged riser cover.
58	Missing/damaged riser cover.
60	Riser cover less than 6 feet.
106	Riser cover lifted from pole.

**AT&T Response:**

- Location #16: Corrective action for Ticket 962302 is scheduled to be completed by 10/15/2025.

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- Location #17: Corrective action for Ticket 962275 is scheduled to be completed by 10/15/2025.
- Location #23: Ticket 1743190 was created for the alleged finding with a due date of 8/26/2030.
- Location #30: Ticket 1743329 was created for the alleged finding with a due date of 8/25/2028.
- Location #40: Corrective action for Ticket 962223 is scheduled to be completed by 10/15/2025.
- Location #48: Ticket 1743597 was created for the alleged finding with a due date of 8/25/2028.
- Location #54: Ticket 1743598 was created for the alleged finding with a due date of 8/26/2028.
- Location #58: Ticket 1743335 was created for the alleged finding with a due date of 8/26/2028.
- Location #60: Ticket 1743337 was created for the alleged finding with a due date of 8/26/2030.
- Location #106: Ticket 1744045 was created for the alleged finding with a due date of 8/26/2028.

**Alleged Field Violations #18: GO 95, Rule 92.1-B, Conductors, Cables and Messengers, Between Cables and Messengers and Other Conductors**

Location #	Finding
50	Less than 6 ft clearance between communication line and supply conductor with a guard. Note: AT&T work order identified the non-conformance, but the work order was marked closed. The work had not been completed. See also Record Finding 5b.

**AT&T Response:**

- Location #50: Ticket 1743579 was created to replace ticket 957082 and is scheduled to be completed and closed by 9/30/2025.

**Alleged Field Violations #19: GO 128, Rule 17.1, Design, Construction and Maintenance**

Location #	Findings
5	Unsecured enclosure (Fixed in field)
87	Enclosure could not be opened.

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**AT&T Response:**

- Location #5: AT&T addressed the alleged finding as noted above.
- Location #87: Ticket 1743757 was created for the alleged finding with a due date of 8/27/2026.

**Alleged Field Violations #20: GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self- contained Surface-mounted Equipment Enclosures**

Location #	Findings
2	Missing ownership mark (Fixed in Field)
4	Missing ownership mark (Fixed in Field)
53	Missing ownership mark
87	Missing ownership mark (Fixed in Field)
88	Missing ownership mark (Fixed in Field)

**AT&T Response:**

- Location #53: Ticket 1743446 was created for the alleged finding with a due date of 8/14/2030.
- Location #2, #4, #87, #88: AT&T addressed the alleged finding as noted above.

**Observations**

Location #	Findings
45	Low service drop.
45	Low clearance between power and communications. (Liberty Utilities)
56	Uncovered riser.
58	Uncovered riser.
60	Uncovered riser.



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64	Exposed ground wire. (Pacific Gas and Electric)
65	Broken lashing wire.
65	Rope used as attachment.
78	Low span. About 7 feet.
80	Cable line abandoned.
81	Third party lines touching AT&T line and supply power.
94	Cable riser not covered.
95	Broken lashing.
98	Abandoned asset.
107	Uncovered riser.
109	Cable clearance from power on pole. (Comcast)

**AT&T Response:** Third Party notifications have been entered for the alleged observations.