

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

**Alleged Records Violation #1:** ESRB's review of AT&T's overhead (OH) work orders from May 2020 through May 2025 found that AT&T had 91 late work orders out of 628 total work orders (14.5% late).<sup>1</sup> Out of the 91 late work orders, there were 86 late-open, two (2) late-closed, and three (3) late-canceled. Late-open work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 91 late work orders by hazard level and type.

**Table 1: Late Work Orders**

Hazard Levels	Late-Open Work Orders	Late-Closed Work Orders	Late-Canceled Work Orders
1	0	1	0
2	26	0	0
2a	32	0	0
2b	22	0	3
2c	6	1	0
3	0	0	0
<b>Total</b>	86	2	3

**AT&T Response:** Without admitting that AT&T violated GO 95, Rule 18, if the information AT&T produced in response to the pre-audit data request suggests that 86 tickets are pending late and 2 were closed late, this 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, and the completion of the corrective action may occur well before that completion is actually documented. That said, AT&T is continuing to review each of the 86 work orders identified as past due to determine whether any work order should be cancelled or invalidated, or whether any of the alleged non-conformances have been remedied and documented as such.

Table 2 below lists the latest work orders at a hazard level.

Hazard Level	Work Order #	Days Late
1	1571000	102
2b	774653	1,332
3	n/a	n/a

**AT&T Response:** Without admitting that AT&T violated GO 95:

- The required work associated with Ticket 1571000 was completed on 2/3/2025.
- Ticket 774653 was closed on 10/28/25, with no trouble at the pole being found.

**Alleged Records Violation #2:** ESRB's review of AT&T's underground (UG) work orders from May 2020 through May 2025 found that AT&T had one (1) late-closed work order out of 13 total work orders (8% late). There were no late-open or late-canceled work orders. See Table 3 below for additional information on the late-closed work order.

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

**Table 3: Late UG Work Order**

PACKAGE ID	Identification Date	DUE DATE	COMP DATE	DAYS LATE	SERVICE PRIORITY	DESCRIPTION	LAT_LONG	Priority Level
704890	10/5/2020	10/6/2021	1/3/2022	89	Service Affecting - POTS	MARKIT Rebuild and recast underground cable splice. 100 pr and terminal tail	40.934236, -124.103996	na

**AT&T Response:** Without admitting that AT&T violated GO128:

- AT&T investigated the ticket on 4/18/2021 and determined that no customers were affected by the described issue. The ticket was eventually closed on 1/3/2022.

**Alleged Records Violation #3:** During the field audit, ESRB inspected 45 non-HFTD locations with AT&T's overhead facilities. Of these 45 locations, 14 had associated GO 95 violations (31%). AT&T's *Visual Inspections of Overhead Lines* procedure requires patrols for all OH communication lines in Northern California every 20 years. However, GO 95, Rule 31.2 requires the **frequent** and **thorough** inspection of OH communication lines to ensure they are in good condition [*emphasis added*]. Additionally, patrols by definition do not constitute a thorough inspection.<sup>3</sup> ESRB's finding rate of 31% in non-HFTD areas where AT&T patrols every 20 years indicates that AT&T's current inspection program for its non-HFTD areas is insufficient for complying with GO 95, Rules 31.2 and 80.1-A(2).

**AT&T Response:** AT&T respectfully disagrees with the above conclusions. Of the 14 non-HFTD locations identified in the audit as having GO 95 violations, 7 of those alleged violations were already made the subject of tickets for pending remediation. This reduces the rate of alleged non-HFTD GO 95 non-conformances found in this audit to 15.5% (7 were already being scheduled for remediation). Rule 18 also allows communications providers to set reasonable due dates for the repair of observed non-conformances. Additionally, Rule 80.1 expressly approves patrol inspections as appropriate in certain situations, including in HFTD locations. Finally, AT&T employs an active inspection program, in addition to the specific intervals prescribed in GO 95, whereby technicians in the field are charged with examining any network equipment near the site of any service visit and then noting and documenting any observed non-conformance for eventual repair.

**Alleged Records Violation #4:** ESRB noted that AT&T could not provide any UG patrol or inspection records in the last five years (May 2020 through May 2025). In response to the San Joaquin, Stanislaus, and Calaveras County Group audit in March 2025, AT&T stated that "employees regularly inspect underground systems and facilities during work to ensure they are well- maintained and meet GO 128 standards."<sup>4</sup> ESRB disagrees that only conducting inspections of facilities that undergo construction/maintenance work constitutes a frequent and thorough inspection program. ESRB asserts that having a documented inspection procedure, defined inspection intervals, and retaining inspection records is acceptable good practice. AT&T lacks sufficient evidence to demonstrate it maintains and inspects its UG equipment in accordance with GO 128, Rules 12.2, 17.1, and 17.2.

**AT&T Response:** To the extent the ESRB requires a written maintenance program or procedural manual for such inspections, GO 128 does not require that of the communications systems owner. AT&T

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

employees regularly inspect underground systems and facilities during work to ensure they are well-maintained and meet GO 128 standards.

**Alleged Field Violations #1: GO 95, Rule 31.1, Design, Construction and Maintenance**

Location	Violation Description
2	AT&T needs to attach to new pole.
7	Tree causing strain to down guy.
8	AT&T line attached to pole with tape/string.
8	Broken lashing wire.
10	Damaged high-vis strip.
17	Damaged/loose high-vis strips.
18	Broken lashing wire. AT&T has an open work order # 1337683 to repair the lashing wire.
19	String-by service line loose/slacked needs to be lashed.
33	Missing high-vis strips.
37	Buddy pole.
41	Missing high-vis strips.
46	Broken lashing wire. AT&T has an open work order # 1347739 to repair the lashing wire.
47	Missing high-vis strips.
49	Missing high-vis strips.
50	Broken lashing wire. AT&T has an open work order # 991932 to repair the lashing wire.
51	Pole leaning about 7-8% and needs a guy wire.
61	Missing high-vis strips.
64	Missing high-vis strips.
68	Buddy pole. AT&T has an open work order # 775513 to transfer its facilities.

**AT&T Response:**

- Location #2: Ticket 1768904 was created for the alleged finding with a due date of 10/19/2030.
- Location #7: Corrective action for ticket 984781 is scheduled to be completed by 9/29/2026.
- Location #8: Ticket 1768910 was created for the alleged finding with a due date of 4/19/2026.

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

- Location #10: Ticket 1768919 was created for the alleged finding with a due date of 4/19/2026.
- Location #17: Ticket 1769464 was created for the alleged finding with a due date of 10/20/2026.
- Location #18: Corrective action for ticket 1337683 is scheduled to be completed by 12/31/2025.
- Location #19: Ticket 1768905 was created for the alleged finding with a due date of 12/31/2025.
- Location #33: Ticket 1768920 was created for the alleged finding with a due date of 10/19/2026.
- Location #37: Ticket 1714615 was created for the alleged finding with a due date of 6/18/2030.
- Location #41: Ticket 1768128 was created for the alleged finding with a due date of 10/16/2026.
- Location #46: Corrective action for ticket 1347739 is scheduled to be completed by 7/25/2028.
- Location #47: Ticket 1769013 was created for the alleged finding with a due date of 4/19/2026.
- Location #49: Ticket 1769009 was created for the alleged finding with a due date of 10/19/2028.
- Location #50: Corrective action for ticket 991932 is scheduled to be completed by 12/31/2025.
- Location #51: Ticket 1769001 was created for the alleged finding with a due date of 10/19/2028.
- Location #61: Ticket 1768922 was created for the alleged finding with a due date of 10/19/2028.
- Location #64: Ticket 1769014 was created for the alleged finding with a due date of 4/19/2026.
- Location #68: Ticket 775513 has been cancelled, and TPN 1769385 has been initiated for PGE to replace the pole because of deterioration at its top section.

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

**Alleged Field Inspection Violations #2:** Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 4 Column B

Location	Violation Description
6	Low AT&T line along rural road, approximately 7-8 feet groundline clearance.
45	Downed AT&T line along rural road.

**AT&T Response:**

- Location #6: Corrective action for ticket 984780 is scheduled to be completed by 9/29/2026.
- Location #45: Corrective action for ticket 1714896 is scheduled to be completed by 6/18/2028.

**Alleged Field Inspection Violations #3:** GO 95, Rule 86.2, Guys

Location	Violation Description
6	Broken down guy.
35	Slack down guy.
45	Slack down guy.
53	Broken down guy. AT&T has an open work order # 1541409 to replace the guy.

**AT&T Response:**

- Location #6: Ticket 1768911 was created for the alleged finding with a due date of 4/19/2026.
- Location #35: Ticket 1768903 was created for the alleged finding with a due date of 10/19/2030.
- Location #45: Corrective action for ticket 1714896 is scheduled to be completed by 6/18/2028.
- Location #53: Corrective action for ticket 1541409 is scheduled to be completed by 12/31/2025.

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

**Alleged Field Inspection Violations #4: GO 95, Rule 35, Vegetation**

Location	Violation Description
23	Fallen tree limb on AT&T line. AT&T has an open work order # 1337657 to trim the limb.
41	AT&T line has vegetation strain/abrasion.
73	AT&T line has vegetation strain/abrasion.

**AT&T Response:**

- Location #23: Corrective action for ticket 1337657 is scheduled to be completed by 7/31/2026.
- Location #41: Ticket 1723028 was created for the alleged finding with a due date of 1/15/2026.
- Location #73: Ticket 1768913 was created for the alleged finding with a due date of 4/19/2026.

**Alleged Field Inspection Violations #5: GO 95, Rule 44.3, Replacement**

Location	Violation Description
10	Pole missing large chunk of wood at high-vis strip.
47	Pole missing chunk of wood near base.
50	Crossarm split in half.
52	Pole damaged and split at base due to car collision.
64	Pole has woodpecker hole and deterioration at the top. AT&T needs to assess the pole.

**AT&T Response:**

- Location #10: Ticket 1768919 was created for the alleged finding with a due date of 4/19/2026.
- Location #47: Ticket 1769013 was created for the alleged finding with a due date of 4/19/2026.
- Location #50: Ticket 1769010 was created for the alleged finding with a due date of 10/19/2026.
- Location #52: Ticket 1769012 was created for the alleged finding with a due date of 4/19/2026.
- Location #64: Ticket 1769014 was created for the alleged finding with a due date of 4/19/2026.

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

**Alleged Field Inspection Violations #6:** GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet Above the Ground

Location	Violation Description
20	String-by service drop runs down pole without riser cover.
30	Service riser not properly secured and missing cover.
61	Riser not covered up to 8 feet.

**AT&T Response:**

- Location #20: Ticket 1768901 was created for the alleged finding with a due date of 12/31/2025.
- Location #30: Ticket 1768131 was created for the alleged finding with a due date of 10/16/2028.
- Location #61: Corrective action for ticket 1345649 is scheduled to be completed by 7/27/2026.

**Alleged Field Inspection Violations #7:** GO 95, Rule 31.6, Abandoned

Location	Violation Description
27	AT&T idle line wrapped around pole and another idle service hanging low at midspan. AT&T has an open work order # 1637198 to remove the lines.

**AT&T Response:**

- Location #27: Corrective action for ticket 1637198 is scheduled to be completed by 3/6/2028.

**Alleged Field Inspection Violations #8:** GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 5 Column B

Location	Violation Description
27	AT&T low service drop in front yard, approximately 6.5 feet groundline clearance.

**AT&T Response:**

- Location #27: Corrective action for ticket 1637198 is scheduled to be completed by 3/6/2028.

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

**Alleged Field Inspection Violations #9: GO 95, Rule 86.9, Guy Marker (Guy Guard)**

Location	Violation Description
46	Damaged guy guard. AT&T has an open work order # 1348020 to replace the guy guard.
59	Down guy missing guy guard.

**AT&T Response:**

- Location #46: Corrective action for ticket 1348020 is scheduled to be completed by 7/25/2028.
- Location #59: Ticket 1768906 was created for the alleged finding with a due date of 10/19/2030.

**Alleged Field Inspection Violations #10: GO 95, Rule 86.6-B(2), Sectionalized Because of Exposure or Proximity to Supply Conductors, Guys in Proximity**

Location	Violation Description
59	Down guy less than 4 feet from secondary conductors is missing a guy bob.

**AT&T Response:**

- Location #59: Ticket 1768906 was created for the alleged finding with a due date of 10/19/2030.

**Alleged Field Inspection Violations #11: GO 95, Rule 91.3-C, Stepping**

Location	Violation Description
61	Low pole step.

**AT&T Response:**

- Location #61: Ticket 1768922 was created for the alleged finding with a due date of 10/19/2028



AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

**Alleged Field Inspection Violations #12:** GO 95, Rule 84.6-B, Ground Wires

Location	Violation Description
63	Ground wire exposed and missing ground molding. AT&T has an open work order # 991601 to install ground molding.
69	Ground wire exposed.

**AT&T Response:**

- Location #63: Corrected action for ticket 991601 is scheduled to be completed by 12/31/2025.
- Location #61: Ticket 1768923 was created for the alleged finding with a due date of 10/19/2028

**Alleged Field Inspection Violations #13:** GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 8 Column C

Location	Violation Description
77	Low clearance between AT&T and Cable TV service drops. AT&T has an open work order # 1337756 to address the clearance infraction.

**AT&T Response:**

- Location #77: Corrective action ticket 1337756 is scheduled to be completed by 5/31/2026.

**Alleged Field Inspection Violations #14:** GO 95, Rule 92.4-C2(c), Ground Rods (Ground Electrodes)

Location	Violation Description
77	Exposed and abandoned ground rod.

**AT&T Response:**

- Location #77: Ticket 1768924 was created for the alleged finding with a due date of 10/19/2028

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

**Alleged Field Inspection Violations #15:** GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self- contained Surface-mounted Equipment Enclosures

Location	Violation Description
84	Pedestal missing ownership sign. AT&T added new signage during the audit.

**AT&T Response:**

- Location #84: Resolved in the field 7/18/2025

**Alleged Field Inspection Violations #16:** Rule 18, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards

Location	Violation Description
2	Cable TV needs to attach to new pole.
3	PG&E span guy contacting metal crossarm brace/bracket.
5	Cable TV amplifier box is open.
5	Cable TV line contacting AT&T line due to Cable TV slack.
21	Cable TV idle line wrapped around pole.
27	Multiple idle Cable TV lines hanging down pole and one attached to primary guy.
55	PG&E down guy slack.
56	PG&E pole leaning over 10%.
57	Dirty/corroded PG&E primary insulators.
58	Cable TV line contacting PG&E secondary guy.
62	PG&E pole has 3 large woodpecker holes and a split near the comms level.
63	PG&E pole has significant amount of termite holes and deterioration.
63	PG&E ground wire exposed.
63	Abandoned PG&E anchor point needs to be removed.
66	PG&E pole has 2 woodpecker holes that need assessment.
75	PG&E pole has 2 woodpecker holes, needs assessment.
78	PG&E pole is deteriorated and has large vertical cracks. AT&T has an open third-party notification # 1337677 for PG&E to inspect the pole.
86	Cable TV riser missing cover.

AT&T'S RESPONSE TO AUDIT RELATED TO  
HUMBOLDT COUNTY CONDUCTED  
JULY 14 – JULY 18, 2025

88	Broken PG&E guy hanging down pole.
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**AT&T Response:** Notifications have been sent to the relevant utilities regarding the reported observations.