



California Public Utilities Commission's  
Electric Safety and Reliability Branch (ESRB)  
Communication Infrastructure Provider Annual Audit  
for  
Sonic Telecom, LLC's East Bay Infrastructure  
Fiscal Year 25-26

*Sonic Response:  
CPUC CIP Audit Findings*

*In compliance with CPUC General Orders 95 & 128*

*January 9, 2026*

*Response Submitted to:  
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# ***Sonic Telecom, LLC***

## Response Information

The ESRB Audit Report is well organized in structure, so Sonic has copied the document in total and submitted answers directly below each section. Some sections may have multiple answers. For ease of reading, Sonic Telecom, LLC's responses have been input using red font color.

**CPUC AUDIT FINDINGS OF  
SONIC COMMUNICATIONS – EAST BAY SERVICE AREA  
AUGUST 18 – 22, 2025**

**I. Records Review**

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- Sonic’s Facility Statistics for its East Bay Service Area as of June 2025, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Sonic’s East Bay Service Area Facility Maps as of June 2025.
- A description of Sonic Communications Overhead and Underground Maintenance Program.
- Sonic’s East Bay Service Area Inspection Data containing data for the inspected facility type, facility location, fire threat district location, and inspection date from June 2020 through June 2025.
- Sonic’s overhead and underground work orders created between June 2020 through June 2025.
- Safety Hazards Notifications Sonic Received from Third Party Utilities from June 2020 through June 2025.
- Safety Hazard Notifications Sonic Sent to Third Party Utilities from June 2020 through June 2025.
- Pole Loading Calculations for ten facilities from June 2020 to June 2025.
- Records of intrusive pole tests conducted from June 2020 to June 2025.
- Sonic’s new construction projects in the East Bay Service Area from June 2020 through June 2025.

## II. Records Violations

ESRB observed the following violations during the record review portion of the audit:

1. **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.”*

### **GO 95, Rule 80.1, Inspection Requirements for Communication Lines** states in part:

*“A. Patrol and Detailed Inspections  
(1) Inspection Requirements for Joint-Use Poles in High Fire-Threat District In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table.*

<i>Inspection</i>	<i>Tier 2</i>	<i>Tier 3</i>
<i>Patrol</i>	<i>2 Years</i>	<i>1 Year</i>
<i>Detailed</i>	<i>10 Years</i>	<i>5 Years</i>

### **ESRB Finding:**

Sonic has overhead facilities in Tier 2 and 3 locations in its East Bay Service Territory. Sonic has in total 57,354 Overhead Poles and 727 Underground Structures. Inspection records for 56 facilities were provided for 2025, with all the inspections performed on 7/9/2025. The inspections for 53 facilities were performed late according to the deadlines provided in the record. No inspection records were provided for inspections from 2020 to 2024.

During the field audit, Sonic personnel stated that the company has operated facilities in Richmond, Berkeley and Oakland for about 7-8 years. However, Sonic has only operated for about 2-3 years in other areas in the East Bay Service Territory.

**SONIC RESPONSE:** *These last facts are incorrect. While we have been operational in Berkeley for 7-8 years, we have been in Oakland for only 3-4 years and in Richmond for 2 years at the time of the audit. This was conveyed at the time of the audit site walks and should be apparent in the documentation provided. However, if further documentation is needed, please let us know so we can officially clarify the record.*

During the field audit, inspections were performed at six locations in Berkeley, sites 70-75 listed in the Field Inspection part of the report, which are all in Tier 3 areas. No records were provided for these sites in the inspection spreadsheet. For Tier 3 locations, 4 patrols and 1 detailed inspection should have been performed between June 2020 and June 2024. For Tier 2 locations, 2 patrols should have been done between 2020 and 2024. Sonic does not comply with the inspection requirements of Rule 80.1 in Richmond, Berkeley and Oakland. Sonic should ensure procedures and processes are in place to perform inspections in Richmond, Berkeley and Oakland at HFTD sites, as these areas have operated through one inspection cycle.

**Sonic Response:** Sonic is unable to locate the requested records for the Tier 2 and Tier 3 areas. Sonic believes that these were done. Out of an abundance of caution, Sonic will reinspect these facilities to be sure that we have the necessary records in the future.

With this being said, we ask that ESRB revisit the Oakland and Richmond area timing with Sonic as Sonic has not been operational in those areas for the amount of time the ESRB report states. We would be happy to discuss this with you further at your convenience.

2. **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.*

*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. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165. 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.*

*(1) 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 subject to the exception specified below.”

### **ESRB Finding:**

Sonic provided work order records from June 2020 to June 2025. Sonic does not have a written procedure to assign work order priority levels and corrective action deadlines in accordance with Rule 18B. The 56 inspection records provided for 2025 do not have priority levels or the timeline of repair for the identified issues.

**SONIC RESPONSE:** Sonic believes that the call out of *RULE 18B* may be incorrect as the passage cited is actually *RULE 18A*. Sonic is currently working toward the creation of a sustainable audit and reporting program. After the 2024 audit report was finalized, we began negotiations with a particular vendor to support this program. Unfortunately, after the vendor experienced a change in organizational structure and personnel late into our talks, the negotiations fell apart. Since then, we have begun working with a new vendor, but the negotiations were unable to be completed in time for the 2025 audit. We fully expect to have a program in place by the 2026 audit, depending on how early in 2026 that an audit is ordered.

### III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Site #	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
1	• UG Vault	37.9252, -121.725048	Balfour Rd/Fairview Ave	Brentwood
2	• UG Vault	37.9252, -121.727471	Balfour Rd/Fairview Ave	Brentwood
3	• UG Vault	37.9249, -121.728552	Balfour Rd/Fairview Ave	Brentwood
4	• Splicing Cabinet	37.9238, -121.728541	120 Summerset Drive	Brentwood
5	• UG Vault	37.9209, -121.741098	308 Foothill Drive	Brentwood
6	• UG Vault	37.9225, -121.741151	2304 Flora Court	Brentwood
7	• UG Vault	37.9235, -121.741777	2398 Fernwood Lane	Brentwood
8	• UG Vault	37.9348, -121.750175	2694 Presidio Drive	Brentwood
9	• UG Vault	37.9399, -121.742659	822 Altessa Drive	Brentwood
10	• UG Vault	37.9505, -121.727055	1869 La Fonte Court	Brentwood
11	• UG Vault	37.9500, -121.724349	1709 La Pergola Drive	Brentwood
12	• UG Vault	37.9523, -121.722633	1629 Dawnview Drive	Brentwood
13	• UG Vault	37.9570, -121.725964	1637 Lillian Street	Brentwood
14	• UG Vault	37.9569, -121.716603	2104 Gold Poppy St	Brentwood
15	• Pole	38.0058, -122.033534	3705 Montreal Circle	Concord
16	• Pole	37.9952, -122.029548	2524 E Olivera Rd	Concord
17	• Pole	37.9933, -122.037806	2218 Krueger Dr	Concord
18	• Pole	37.9887, -122.036472	2394 Hemlock Ave	Concord
19	• Pole	37.9619, -122.001597	4087 Kensington Drive	Concord
20	• Pole	37.97357, -122.0156	1679 Richardson Court	Concord
21	• Pole	37.97364, -122.0156		Concord
22	• Pole	37.97406, -122.0156		Concord
23	• Pole	37.97441, -122.0153	1696 Richardson Court	Concord
24	• Pole	37.97444, -122.0156		Concord
25	• Pole	37.97465, -122.0157	3349 Walnut Ave	Concord
Site #	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
26	• Pole	37.97502, -122.0156	3349 Walnut Ave	Concord
27	• Pole	37.97466, -122.0155		Concord
28	• Pole	37.97465, -122.0151		Concord
29	• Pole	38.00632, -122.3146	2298 Meadowlark St	San Pablo
30	• Pole	38.00663, -122.3145	2320 Meadowlark St	San Pablo
31	• Pole	38.00714, -122.3143	one span next to site 30	San Pablo
32	• Pole	38.00745, -122.3144	2336 Meadowlark St	San Pablo

33	• Pole	38.00778, -122.3143		San Pablo
34	• Pole	38.00811, -122.3143		San Pablo
35	• Pole	38.00891, -122.3142		San Pablo
36	• Pole	38.00916, -122.3143		San Pablo
37	• Pole	38.00926, -122.3148		San Pablo
38	• Pole	38.00966, -122.3153	2365 Cypress Ave	San Pablo
39	• Pole	38.00952, -122.3155	2359 Cypress Ave	San Pablo
40	• Pole	38.00901, -122.3160	2353 Cypress Ave	San Pablo
41	• Pole	38.00904, -122.3160	2335 Cypress Ave	San Pablo
42	• Pole	38.00885, -122.3163	2329 Cypress Ave	San Pablo
43	• Pole	38.00874, -122.3169	2311 Cypress Ave	San Pablo
44	• Pole	38.00849, -122.3171	2299 Cypress Ave	San Pablo
45	• Pole	38.00863, -122.3174	2293 Cypress Ave	San Pablo
46	• Pole	37.95074, -122.3183	5927 McBryde Ave	Richmond
47	• Pole	37.95067, -122.3179		Richmond
48	• Pole	37.95057, -122.3174		Richmond
49	• Pole	37.95048, -122.3169		Richmond
50	• Pole	37.95039, -122.3165		Richmond
51	• Pole	37.94956, -122.3171	6015 Dimm Way	Richmond
52	• Pole	37.94924, -122.3168		Richmond
53	• Pole	37.94889, -122.3165		Richmond
54	• Pole	37.94848, -122.3161		Richmond
55	• Pole	37.91800, -122.3022	7330 Schmidt Lane	El Cerrito
56	• Pole	37.91771, -122.30254	7250 Schmidt Lane	El Cerrito
57	• Pole	37.91683, -122.30030		El Cerrito
58	• Pole	37.91638, -122.30002		El Cerrito
59	• Pole	37.91615, -122.29986		El Cerrito
60	• Pole	37.91587, -122.29964		El Cerrito
61	• Pole	37.91626, -122.29956		El Cerrito
62	• Pole	37.91646, -122.29910		El Cerrito
63	• Pole	37.91665, -122.29867		El Cerrito
64	• Pole	37.91684, -122.29823		El Cerrito
<b>Site #</b>	<b>Equipment Type(s)</b>	<b>Approximate Latitude / Longitude</b>	<b>Approximate Address</b>	<b>City</b>
65	• Pole	37.90070, -122.28930		Albany
66	• Pole	37.90039, -122.28921		Albany
67	• Pole	37.90002, -122.28914		Albany
68	• Pole	37.89969, -122.28909		Albany
69	• Pole	37.89934, -122.28906		Albany
70	• Pole	37.86896, -122.24713		Berkeley
71	• Pole	37.86923, -122.24726		Berkeley
72	• Pole	37.86955, -122.24733		Berkeley

73	• Pole	37.86992, -122.24706		Berkeley
74	• Pole	37.86994, -122.24662		Berkeley
75	• Pole	37.86997, -122.24651		Berkeley
76	• Pole	37.83315, -122.25069		Oakland
77	• Pole	37.83297, -122.25079		Oakland
78	• Pole	37.83277, -122.25091		Oakland
79	• Pole	37.83257, -122.25102		Oakland
80	• Pole	37.83217, -122.25124		Oakland
81	• Pole	37.83203, -122.25135		Oakland
82	• Pole	37.83176, -122.25156		Oakland
83	• Pole	37.83145, -122.25181		Oakland
84	• Pole	37.83112, -122.25178	243 John St	Oakland
85	• Pole	37.83083, -122.25142		Oakland
86	• Pole	37.83063, -122.25118		Oakland
87	• Pole	37.83041, -122.25092		Oakland
88	• Pole	37.85235, -122.24166	270 Hillcrest Rd	Berkeley
89	• Pole	37.85230, -122.24161	274 Hillcrest Rd	Berkeley
90	• Pole	37.85225, -122.24154	278 Hillcrest Rd	Berkeley

**SONIC RESPONSE:** *Unfortunately, the site numbering that is used in this final report does not align with the numbering of the original planned sites, which were communicated in the original documents sent to the ESRB team pre-audit. During the audit site walks, sites were skipped and others were added but not in keeping with the documentation Sonic provided. Instead, it appears that ESRB has renumbered everything in just a sequential order. This has created a situation where it is difficult to identify the sites in our system. Making it even more difficult, the lat/long column in this final report has locations that do not match up with pre-audit materials. Sonic is working on trying to identify the poles that are actually being called out in this report. If the ESRB team would like to possibly do a Teams or Zoom meeting to review the entire list and match up the sites, Sonic would welcome this option.*

#### IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

- 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.”*

ESRB’s findings related to above Rule are listed in Table 1 Table 1: GO 95, Rule 31.1 Findings

Site #	Findings
15	Sonic lashing on cable and strand is loose.

25	Sonic strand is not properly attached to pole (tied with mule tape to streetlight fixture).
26	Vegetation is contacting Sonic down guy above insulator bob creating a ground path.
35	Sonic down guy is contacting tree and vegetation is contacting down guy above insulator bob creating a ground path.
60	Sonic strand is attached to Comcast cable.
65	Sonic cable is contacting Comcast cable near home.
75	Sonic needs to transfer its facilities to new pole.
85	Sonic needs to transfer its facilities to new pole.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged these infractions and has begun working on resolution to the best of our current ability. If all sites can be correctly identified, Sonic will commit to having these sites completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**2. GO 95, Rule 34, Foreign Attachments** states in part:

*“Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

*Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner’s or owners’ consent.”*

ESRB’s findings related to the above rule are listed in Table 2:

**Table 2: GO 95, Rule 34 Findings**

Site #	Findings
26	Unauthorized attachment (speed limit sign)
35	Unauthorized attachment to pole (rope and advertisement sign)

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. In the case of these two sites, Sonic believes they know which sites these are, despite the numbering, and have logged these sites and will send out Third-Party Notices for remediation by the appropriate attacher. We do still request clarification on site number, just to be sure.*

**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.”*

ESRB’s finding related to above Rule is listed in Table 3:

**Table 3: GO 95, Rule 35 Finding**

Site #	Finding
16	Sonic cable is under strain contacting large tree branch.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged this infraction and has begun working on resolution to the best of our current ability. If this site can be correctly identified, Sonic will commit to having it completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**4. GO 95, Rule 38, Minimum Clearance of Wires from Other Wires** states in part:

*“The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the*

crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.

*Table 2, Case 3C: The clearance between wires, cables and conductors not supported on the same poles, vertically at crossings in spans and radially where colinear or approaching crossings for communication conductors (including open wire, cables and service drops) must be at least 24 inches.*

*Table 2, Case 8C: Vertical separation between conductors and/or cables, on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole and in adjoining midspans for communication conductors (including open wire, cables and service drops) must be at least 12 inches.*

*Table 2, Case 19C, Radial separation between guys and conductors approximately parallel on the same pole must be at least 3 inches.*

*EXCEPTION: Can be less than 12” for strand mounted terminals, splice cases and other equipment located 8” or more from the centerline of the pole, but not less than 1” with mutual agreement between affected owners.”*

ESRB’s findings related to above Rule are listed in Table 4:

**Table 4: GO 95, Rule 38 Finding**

Site #	Findings
16	Sonic down guy contacting ATT service drop and Comcast down guy.
18	Sonic loop does not have adequate clearance to CATV2 cable.
19	Sonic loop does not have adequate clearance to CATV2 cable.
20	Sonic has preform at midspan causing cable to contact CATV2 cable.
21	Sonic has preform at midspan causing cable to contact CATV2 cable.
22	Sonic has preform at midspan causing cable to contact CATV2 cable.
23	Sonic has preform at midspan causing cable to contact CATV2 cable.
26	Sonic and CATV2 cables are contacting.

33	Sonic splice case is contacting Comcast CATV cable.
34	Sonic contacting Comcast cable.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged these infractions and has begun working on resolution to the best of our current ability. If these sites can be correctly identified, Sonic will commit to having these sites completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**5. GO 95, Rule 83.4 Bonding** states in part:

*“When separate communication messengers, or guys, or both, of the same or different ownership, are attached to the same pole, and they are in proximity to electric supply circuits (see Rule 21.5- D), ... such messengers, or guys, or both, shall be bonded together at frequent intervals (see Rule 83.4-A). For purposes of this rule, communication messengers and guys are those which support Class C Circuits (see Rule 20.6) and those Class C Circuits which are used for television transmission.”*

ESRB’s finding related to the above rule is listed in Table 5:

**Table 5: GO 95, Rule 83.4 Finding**

Site #	Finding
15	Sonic is not bonded to other CIP messengers.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged this infraction and has begun working on resolution to the best of our current ability. If this site can be correctly identified, Sonic will commit to having it completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**6. GO 95, Rule 84.4-A(6), Clearances, Across or along Public Thoroughfares** states:

*“Communication conductors over or across public thoroughfares shall have a*

*clearance of 18 feet above ground (Table 1, Case 3, Column B). A reduced clearance to 16 feet is permitted for the portions of communication conductors where no part of the line overhangs any part of the thoroughfare which is ordinarily traveled, or where the line is behind an established curb, ditch or berm that serves to protect such communication conductors from encroachment by vehicular traffic.”*

ESRB’s finding related to above Rule is listed in Table 6:

**Table 6: GO 95, Rule 84.4-A(6) Finding**

Site #	Finding
36	Sonic has low service drop clearance at curb <16 ft.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged this infraction and has begun working on resolution to the best of our current ability. If this site can be correctly identified, Sonic will commit to having it completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**7. 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 above Rule are listed in Table 7:

**Table 7: GO 95, Rule 84.6-B Findings**

Site#	Findings
25	Sonic ground molding is damaged and not attached to pole.

77	Sonic ground molding is damaged.
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**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged these infractions and has begun working on resolution to the best of our current ability. If these sites can be correctly identified, Sonic will commit to having them completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**8. GO 95, Rule 84.8-C(3)(b), Service Drops, Clearances above Ground and Buildings, Above Ground in Areas Accessible to Pedestrians** states in part:

*“Residential Premises: Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet.*

*EXCEPTION: If the building served does not permit an attachment which will provide this 10 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches.”*

ESRB’s findings related to above Rule are listed in Table 8:

**Table 8: GO 95, Rule 84.8-C(3)(b) Findings**

Site #	Findings
39	Sonic has low service drop attachment to home (~ 7 ft 8 inches).
40	Sonic has low service drop attachment to home (~ 8 ft 6 inches).
46	Sonic has low service drop attachment to home (~ 7 ft 6 inches).
65	Sonic has low service drop attachment to home (~ 7ft 11 inches).

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. Sonic does have a question about the site number 40 listed above. The section cited calls out 8 feet 6 inches as acceptable, yet this site is still listed as a violation.*

*That being said, Sonic has logged these infractions and has begun working on resolution to the best of our current ability. If these sites can be correctly identified, Sonic will commit to having them completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**9. GO 95, Rule 87.4-C(3), Clearances, Between Conductors and Cables, Attached to Poles** states in part:

*“Cables or messengers where attached to the surface of poles which support supply conductors, shall not be less than 6 feet vertically below the level of supply conductors.*

*EXCEPTION: This minimum clearance of 6 feet may be reduced to not less than 4 feet below supply conductors of 0 - 750 volts provided a guard arm is placed above the messenger and cable (or self-supporting cable) in accordance with the provision of Rule 87.7-B (see Rule 21.0-D for guard arm definition). No cable or messenger shall be attached to the surface of such a pole less than 2 feet below the lowest level of communication conductors on crossarms unless a minimum horizontal separation of 30 inches is maintained between the messenger or cable and the communication conductors on the opposite side of pole.”*

ESRB’s finding related to above Rule is listed in Table 9:

**Table 9: GO 95, Rule 87.4-C(3) Finding**

Site #	Finding
21	Sonic cable does not have 6 feet separation from the PG&E secondary conductors so guard arm is needed.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged this infraction and has begun working on resolution to the best of our current ability. If this site can be correctly identified, Sonic will commit to having it completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**10. GO 95, Rule 92.4 Grounding** states in part:

*“A. General: The following rules cover the grounding or isolating of communication cable systems, as defined herein. Systems include cables, messengers, and guys, or a combination of these facilities at the supply or communication level.*

*C. Material and Size:*

*(1) Grounding Conductors: The grounding conductors of the communication messenger system shall conform to each of the following requirements:*

*(a) The grounding conductor from each ground rod (ground electrode) to the base of the pole shall not be less than 1 foot below the surface of the ground.*

*(b) The conductor from each ground rod (ground electrode) to the base*

of the pole shall not have less ampacity and mechanical strength than the grounding conductor from the base of the pole to the messenger.

(c) The grounding conductor from the ground rod (ground electrode) to the messenger shall be continuous, unless suitable electrical compression connections are used.

(d) The grounding conductor shall have a minimum ampacity equivalent to No. 6 AWG copper.

(2) Ground Rods (Ground Electrodes): Ground rods on the communication messenger system(s) shall conform to each of the following requirements.

(a) Ground rods shall be corrosion-resisting metal rods or pipes (or equivalent in electrical properties)

(b) Ground rods shall not be less than 5/8-inch in diameter by 8 feet (total) in length; this may include two (2) four-foot joined sections.

(c) Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground.

(d) Pole-butt plates or wrappings shall not be used either in lieu of the aforesaid ground rods or pipes, or as electrodes supplementary thereto.

(e) The driven ground rod(s), pipe(s), or equivalent shall be located 24 inches or more from the surface of the pole.”

ESRB’s findings related to above Rule are listed in Table 10:

**Table 10: GO 95, 92.4-C(1) and (2) Findings**

Site #	Findings
76	Sonic exposed ground rod was not 1 foot below ground surface and was not located 24 inches from the surface of the pole.
78	Sonic exposed ground rod was not 1 foot below ground surface and was not located 24 inches from the surface of the pole.

**SONIC RESPONSE:** Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged these infractions and has begun working on resolution to the best of our current ability. If these sites can be correctly identified, Sonic will commit to having them completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.

#### 11. GO 95, Rule 92.4-D(1), Location of Grounds on Exposed Cables with

**Metallic Shields, Sheaths, or Messengers; and on Exposed Guys** states in part:

*“Exposed Cables and Messengers: The exposed communication cables and messengers shall be grounded: At all deadend poles and at intervals not greater than every one–quarter of a mile (1320 feet).”*

ESRB’s findings related to above Rule are listed in Table 11:

**Table 11: GO 95, 92.4-D(1) Findings**

Site #	Findings
60	Sonic cable deadends at pole and needs to be grounded.
90	Sonic cable deadends at pole and needs to be grounded.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged these infractions and has begun working on resolution to the best of our current ability. If these sites can be correctly identified, Sonic will commit to having them completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

12. **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.”*

ESRB’s finding related to above Rule is listed in Table 12:

**Table 12: GO 128, Rule 17.1 Finding**

Site #	Finding
13	The Sonic Multiport Service Terminal was laying in dirt and should be mounted on a bracket on upper part of vault.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged this infraction and has begun working on resolution to the best of our current ability. If this site can be correctly identified, Sonic will commit to having it completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**13. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures** states:

*“Manholes, handholes, subsurface and self-contained surface mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.”*

ESRB’s finding related to above Rule is listed in Table 13:

**Table 13: GO 128, Rule 17.8 Finding**

Site #	Finding
4	The surface-mounted splicing cabinet is not marked with any ownership identification.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we remediate is the correct site. That being said, Sonic has logged this infraction and has begun working on resolution to the best of our current ability. If this site can be correctly identified, Sonic will commit to having it completed by December 31, 2026. It is worth noting that this is significantly sooner than is required under the current right-of-way rules.*

**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 14 includes all non-Sonic (third-party) findings that ESRB observed during the audit:

**Table 14: Observations**

<b>Site #</b>	<b>Observations</b>
5, 8, 9, 12, 13	City of Brentwood owns UG vault fiber box and needs City of Brentwood ID on vault cover.
15	PG&E pole has split at the top and loose guy/not taut.
15	AT&T service drop has low clearance at road centerline.
15	Comcast service drop has low clearance at road centerline.
15	CATV2 service drop has low clearance at road centerline.
16	Comcast service drop contacting PG&E down guy.
16	CATV2 lashing is loose and wood block on strand is contacting Sonic cable. Also, CATV2 cable is under strain contacting large left tree branch.
16	Comcast cable is under strain contacting large left tree branch and has low service drop clearance over road centerline (~ 17 ft).

16	AT&T cable is under strain contacting large left tree branch.
17	Comcast ground wire is exposed and service drop has low clearance over road centerline.

Site #	Observations
17	CATV2 cable is contacting Sonic guy wire and service drop has low clearance over road centerline.
17	AT&T has low clearance over road centerline.
18	PG&E large woodpecker hole next to streetlight fixture.
19	AT&T transfer facilities to new pole.
19	CATV2 down guy is loose/not taut and service drop does not have 3 inch clearance to down guy.
20	Comcast and CATV2 cables are contacting.
20	CATV2 has low service drop attachment to home (~ 7 ft 2 inches).
20	AT&T splice case is open.
21	AT&T service drops have low clearance (~ 16 ft) at road centerline.
21	CATV2 has low clearance (~ 16 ft) at road centerline.
22	Comcast has missing riser guard and unsecured vertical run for underground service.
24	AT&T splice enclosure is contacting Sonic and comcast down guys and has two service drops in strain contacting tree branches.
26	Comcast down guy above insulator bob is contacting vegetation, creating a ground path.
26	CATV2 down guy above insulator bob is contacting vegetation, creating a ground path.
26	AT&T down guy above insulator bob is contacting vegetation, creating a ground path, and AT&T splice case is contacting Sonic and CATV2 down guys.
27	AT&T has exposed riser at pole base.
27	Comcast has exposed riser at pole base.
27	PG&E upper riser attachment is coming loose.
28	AT&T is missing riser guard for underground service cable.
29	AT&T has damaged ground molding.
32	AT&T lashing is loose and has low service drop clearance at curb.

33	AT&T lashing is loose.
34	Comcast service drop has low clearance at curb.
34	AT&T preform is attached to Comcast cable and preform is contacting Sonic cable.

Site #	Observations
35	Comcast down guy contacting tree and vegetation is contacting down guy above insulator bob creating a ground path.
35	AT&T down guy contacting tree and vegetation is contacting down guy above insulator bob creating a ground path.
35	PG&E down guy contacting tree and one down guy is loose/not taut, and vegetation is contacting down guy above insulator bob creating a ground path.
36	AT&T low service drop clearance at road centerline and at curb.
36	Comcast low service drop clearance at curb.
36	PG&E low service drop clearance at curb.
37	Comcast contacting AT&T line.
37	AT&T low service drop clearance at curb.
37	PG&E has exposed ground.
37	Comcast and PG&E down guys are contacting.
38	PG&E has damaged ground molding.
38	Comcast and AT&T cables contacting over road centerline.
40	AT&T low service drop attachment to home 5ft 6 inches, two service drops with low clearance at road centerline (~ 16 ft) and at curb.
40	Comcast low service drop attachment to home 7ft 11 inches, Comcast service drop contacting Sonic service drop, Comcast cable contacting AT&T cable midspan.
41	Comcast cable is contacting down guy, Comcast service drop is attached to AT&T cable, and Comcast service drop has low clearance road centerline (~ 17 ft 9 inches).
42	Comcast service drop has low clearance at curb (~ 15 ft 6 inches).
42	AT&T service drop has low clearance at curb (~ 13 ft).
42	PG&E service drop has low clearance at curb (< 16 ft).

43	Comcast service drop has low clearance at curb (< 16 ft).
44	Comcast service drop has low clearance at road centerline (<18 ft) and at curb (< 16 ft), and Comcast cable is wrapped around AT&T cable.
44	PG&E ground molding is missing at communications level.
45	Comcast has two service drops with low clearance at curb (< 16 ft).
45	AT&T has two service drops with low clearance at curb (< 16 ft).

Site #	Observations
46	AT&T low service drop attachment to home 7ft 6 inches, service drop line has strain from contact with tree branch and has a dangling line at pole.
46	Comcast low service drop attachment to home 7ft 6 inches.
48	AT&T has damaged lashing and loose dangling cable,
48	Comcast has broken cable and has cable contacting AT&T cable, has strain on service drops at tree branch, and low clearance at road centerline < 18 ft and at curb < 16 ft.
49	AT&T low clearance at road centerline <18 ft and at curb <16 ft, need to transfer service drop to new pole.
49	Comcast line is taped to AT&T line, has low clearance at road centerline <18 ft and at curb <16 ft, need to transfer service drop to new pole.
50	AT&T needs to transfer facilities to new pole, line has low clearance at midspan over road centerline < 18 ft.
50	Comcast needs to transfer facilities to new pole, line has low clearance at midspan over road centerline < 18 ft.
50	PG&E service drop has strain on tree branch.
51	Comcast ground wire is exposed and not covered with molding.
51	AT&T ground wire is exposed and not covered with molding.
52	Comcast has unsecured vertical run to riser.
52	AT&T has low service drop at curb <16 ft.
53	PG&E low service drop clearance at curb < 16 ft.
53	Comcast low service drop clearance at curb < 16 ft.
53	AT&T low service drop clearance at curb < 16 ft, and midspan has low cable clearance ~ 10 ft at curb.

54	AT&T does not have riser for underground cable and has unsecured vertical run.
54	Comcast needs riser for underground cable.
55	AT&T service drop has low clearance at road centerline (~ 17 ft).
56	AT&T riser cables are exposed.
58	AT&T ground wire exposed/molding damaged and service drop has low clearance over road centerline (~ 16 ft).
60	AT&T riser cable exposed at pole base and riser cable has unsupported vertical run, AT&T silver terminal box is taped to splice box and not properly secured, and has no ground at dead end pole. PG&E installed new pole and apparently did pole transfer for communications facilities and did transfer incorrectly.

<b>Site #</b>	<b>Observations</b>
60	Comcast riser cable exposed at pole base and riser cable has unsupported vertical run, Comcast cable bundle is attached to Sonic strand, and has no ground at dead end pole. PG&E installed new pole and apparently did pole transfer for communications facilities and did transfer incorrectly.
61	PG&E guy is contacting Sonic and Comcast cables, PG&E has exposed ground, PG&E service drop has low clearance at curb (~13 ft).
61	AT&T service drop has low clearance at road centerline (~ 17 ft).
62	AT&T has abandoned service drop on the ground, vertical cable run not attached to pole, low service drop clearance at pole (~ 15 ft 11 inch).
62	Comcast has two low service drops at curb <16 ft.
62	PG&E secondary service drop is contacting AT&T service drop and PG&E secondary service drop has low clearance at sidewalk across the street from pole.
63	AT&T needs to transfer its facilities to new pole and has service drop with low clearance at curb <16 ft.
63	Comcast is contacting AT&T cable over road and has service drop with low clearance at curb (~ 14 ft).
64	AT&T has service drop with low clearance at curb <16 ft.
64	Comcast has service drop with low clearance at curb <16 ft.
65	PG&E has pole top split.
65	AT&T has low service drop attachment to home.
65	Comcast has low service drop attachment to home.

66	Comcast has abandoned service drop.
66	PG&E has pole top split starting in upper pole.
67	Comcast cable contacting AT&T cable midspan.
67	Comcast and AT&T loops/amplifier lack adequate clearance near pole.
68	PG&E has pole top split/decay.
69	PG&E has pole top split/decay and low pole step (~ 7ft 2 inches).
69	AT&T has three service drops with low clearance at road centerline <18 ft and at curb <16 ft.
70	Comcast has low cable clearance at curb <16 ft.
70	AT&T has low cable clearance at curb <16 ft.
71	AT&T has abandoned service drop and terminal equipment at pole.

Site #	Observations
71	Comcast has unsupported service drop which is tangled with strand, and had cable contacting AT&T service drops.
72	PG&E has damaged/abandoned guy wire and insulator bob at pole.
72	Comcast cable contacting AT&T cable midspan and low clearance over road centerline (~ 15 ft).
73	PG&E guy wire is wrapped around Sonic, Comcast and AT&T cables.
73	Comcast does not have 12-inch clearance with AT&T cable at midspan.
74	AT&T low clearance at road centerline (~ 17 ft).
75	AT&T needs to transfer its facilities to new pole.
80	AT&T guy wire has vegetation contacting above insulator bob, has exposed riser guard and has low service drop at road centerline <18 ft.
81	Comcast has exposed ground.
82	AT&T service drop has low clearance at road centerline (~ 15ft).
82	Comcast service drop has low clearance at road centerline (~ 15ft), has cable wrapped around AT&T cable at road centerline, has cable contacting AT&T splice box,
83	Comcast has two service drops low clearance at road centerline (~17 ft).
83	AT&T has service drop with low clearance at road centerline (~17 ft).
84	Comcast cable does not have 12-inch clearance to Sonic cable.
85	AT&T needs to transfer facilities to new pole.
85	Comcast needs to transfer facilities to new pole.
85	PG&E secondary service drop does not have 3-ft clearance to street light.
86	AT&T Silver Network Interface Device is not securely attached (taped to cable), and midspan service drop has low clearance at road centerline <18 ft and at curb <16 ft.
86	Comcast does not have adequate clearance to AT&T cable, Comcast has an abandoned drop.
87	Comcast does not have adequate clearance to Sonic backbone cable at midspan.
87	PG&E two secondary service drops do not have 3-ft clearance to street light.
89	AT&T service drop has low clearance at curb <16 ft and has midspan guy wire not properly tensioned.

Site #	Observations
90	Comcast service drop has low clearance at curb <16 ft, has cable with low clearance at pedestrian access path (~ 8 ft 6 inches) and does not have ground installed at dead end pole.
90	AT&T service drop has low clearance at curb <16 ft and does not have ground installed at dead end pole.

**SONIC RESPONSE:** *Sonic again requests clarification on the site numbers, given the previously discussed discrepancy in the site numbering. Without additional identifying information it will be extremely difficult to ensure the site we send out a Third-Party Notice for is the correct site. That being said, Sonic has logged these infractions and has begun working on resolution to the best of our current ability. If these sites can be correctly identified, Sonic will commit to having the notices completed by December 31, 2026.*