

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 11, 2025

CA2025-1202

Ross Johnson
AT&T Director of Regulatory Relations
430 Bush Street, 5th Floor
San Francisco, CA 94108

SUBJECT: Audit of AT&T LA Construction Region

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Sultan Tipu of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T LA Construction Region from February 24, 2025, to February 28, 2025. The audit included a review of AT&T's LA Construction Region inspection and maintenance records and a field inspection of AT&T's LA Construction Region facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). An itemized copy of the audit findings violations identified by Staff is enclosed along with this letter. Please advise me no later than May 12, 2025, by electronic or hard copy, of all corrective measures taken by AT&T to remediate and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, please contact Sultan Tipu at (213) 660-5524 or Sultan.Tipu@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Sultan Tipu, Utilities Engineer, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- AT&T's Intrusive Inspection of Wood Poles
- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 95, Rule 31.1, 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 communication or supply lines and equipment.

GO 95 Rule 18, Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

AT&T's records indicated that from 2018 to 2024, AT&T completed 5 overhead work orders past AT&T's scheduled due date for corrective action.

III. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID	Type of Structure	Location
1	4659466E	Pole	Avalon
2	504459H	Pole	Avalon
3	4659465E	Pole	Avalon
4	1492874E	Pole	Avalon
5	39670	Pole	Avalon
6	39669	Pole	Avalon
7	4926589E	Pole	Avalon
8	1492878E	Pole	Avalon
9	2365060E	Pole	Avalon
10	2365061	Pole	Avalon
11	2365062E	Pole	Avalon
12	2365063E	Pole	Avalon
13	2365064E	Pole	Avalon
14	2365065E	Pole	Avalon
15	2365066E	Pole	Avalon
16	4944845E	Pole	Avalon
17	X1041E	Pole	Avalon
18	2365067E	Pole	Avalon
19	1492837E	Pole	Avalon
20	1492838E	Pole	Avalon
21	1492839E	Pole	Avalon
22	1492840E	Pole	Avalon
23	2006380E	Pole	Avalon
24	1491783E	Pole	Avalon
25	4926588E	Pole	Avalon
26	1491732E	Pole	Avalon
27	1491729E	Pole	Avalon
28	1491731E	Pole	Avalon
29	4807604E	Pole	Avalon
30	X10119E	Pole	Avalon
31	433600H	Pole	Avalon
32	439074H	Pole	Avalon
33	1491755E	Pole	Avalon
34	2381836E	Pole	Avalon
35	2381631E	Pole	Avalon
36	1491742E	Pole	Avalon
37	2381633E	Pole	Avalon
38	2381629E	Pole	Avalon
39	2381630E	Pole	Avalon

40	1492458E	Pole	Avalon
41	304 Clemente Ave.	Handhole	Avalon
42	312 Clemente Ave.	Handhole	Avalon
43	316 Clemente Ave.	Handhole	Avalon
44	Avalon Canyon Road, Unit 3	Pedestal	Avalon
45	Avalon Canyon Road, Unit 39	Pedestal	Avalon
46	Avalon Canyon Road, Unit 16	Pedestal	Avalon
47	2167576E	Pole	Avalon
48	2127575E	Pole	Avalon
49	1491909E	Pole	Avalon
50	1492395E	Pole	Avalon
51	1491799E	Pole	Avalon
52	2283517	Pole	Avalon
53	X10136E	Pole	Avalon
54	1492846E	Pole	Avalon
55	X8634E	Pole	Avalon
56	1492847E	Pole	Avalon
57	1492848E	Pole	Avalon
58	1492849E	Pole	Avalon
59	X10113E	Pole	Avalon
60	X8608E	Pole	Avalon
61	4879502E	Pole	El Segundo
62	P7NTP	Pole	El Segundo
63	603453H	Pole	El Segundo
64	4891473E	Pole	El Segundo
65	603454H	Pole	El Segundo
66	679297H	Pole	El Segundo
67	1325 Franklin Ave.	Pole	El Segundo
68	744157H	Pole	El Segundo
69	4702300E	Pole	El Segundo
70	1158880E	Pole	El Segundo
71	1158881E	Pole	El Segundo
72	4706515E	Pole	El Segundo
73	1158882E	Pole	El Segundo
74	4470036E	Pole	El Segundo
75	4894846E	Pole	Hawthorne
76	4892509E	Pole	Hawthorne
77	1674038E	Pole	Hawthorne
78	1264583E	Pole	Hawthorne
79	4829070E	Pole	Hawthorne
80	608920H	Pole	Hawthorne
81	4852663E	Pole	Hawthorne
82	608918H	Pole	Hawthorne
83	608917H	Pole	Hawthorne
84	608916H	Pole	Hawthorne

85	4179092E	Pole	Hawthorne
86	15102 Dotty Ave.	B-Box	Lawndale
87	1691 Bruins Street	Handhole	W. Athens
88	1677 Bruins Street	Handhole	W. Athens
89	1655 Bruins Street	Handhole	W. Athens
90	1625 Bruins Street	Handhole	W. Athens
91	1608 Bruins Street	Handhole	W. Athens
92	20116 Tajauta Ave.	Handhole	Carson
93	20128 Tajauta Ave.	Handhole	Carson
94	20112 Tajauta Ave.	Handhole	Carson
95	19822 Tajauta Ave.	Handhole	Carson
96	19806 Tajauta Ave.	B-Box	Carson
97	1461 Abottson Street	Handhole	Carson
98	1451 Abottson Street	Handhole	Carson
99	20014 Hillford Ave.	Handhole	Carson
100	20015 Hillford Ave.	Handhole	Carson

IV. **Field Inspection – Violations List**

My staff observed the following violations during the field inspections:

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.

AT&T's facilities on the following poles required maintenance:

- Pole 1491729E – the AT&T splice box fastener rings were abandoned.
- Pole 608916H - the “eye” of the AT&T down guy anchor attached the pole was buried.
- 4852663E – service drop is loose and not properly secured to pole.
- 1491732E – service drop not properly secured to the pole.

Missing or damaged pole tags were observed on each of the following poles:

- 4944845E
- P7NTP
- 1325 Franklin
- 4702300E
- 1491709E
- 679297H
- 744157H

Missing or damaged visibility strips were observed on each of the following poles:

- 2006380E
- 4800760E

GO 95, Rule 31.6, Abandoned Lines, states:

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. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.

Permanently abandoned service drops on or near the following poles should be removed:

- 3960
- 2365063E
- 4926588E
- 1492395E
- 2365061E
- 1492838E
- 1491732E
- 1158882E
- 2365062E
- 1492839E
- 2167576E

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8, requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

The following AT&T facilities had less than 12 inches of vertical clearance from third-party communications conductors:

- Pole 1492846E: an AT&T conductor was in contact with a third-party communications conductor.
- Pole X8634E: an AT&T conductor was contacting a third-party communications conductor.
- Pole 1158881E: an AT&T conductor was in contact with a “terminal box” on a third-party communications conductor.
- Pole 608917H: an AT&T conductor was in contact with a third-party communications conductor.

Pole 492658E and 2365076E: AT&T conductors had less than 12 inches of vertical clearance from a third-party communications conductor.

GO 95, Rule 86.9 - Guy Marker (Guy Guard), states in part:

A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.

The marker (guard) on the down guy wire supporting pole number 149783E was missing.

GO 128, Rule 42.7, Covers, states in part:

Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal.

The handhole cover located at 1608 Bruins Street, W. Athens, LA, was not secured.

General Order 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.

The handhole at 1655 Bruins Street, W. Athens, LA was not sealed to mitigate water intrusion.