

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 18, 2025

CA2025-1254

Kevin Daniel
Owner
Horizon Cable TV, Inc.
520 Mesa Road, CA 94956

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Horizon Cable TV

Mr. Daniel:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Monica Hoskins and Nora Nguyen of ESRB staff conducted a CIP audit of Horizon Cable TV (Horizon) from January 21 through January 24, 2025. During the audit, ESRB staff conducted field inspections of Horizon's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than May 16, 2025, via electronic copy of all corrective actions and preventive measures taken by Horizon to correct the identified violations and prevent the recurrence of such violations and observations.

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 provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Monica Hoskins at monica.hoskins@cpuc.ca.gov or (415) 652-1847.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

California Public Utilities Commission

Enclosure: CPUC Audit Findings of Horizon Cable TV

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Karl Winkvist, Senior Plant Technician, Horizon Cable TV

**HORIZON CABLE TV
COMMUNICATIONS AUDIT FINDINGS
JANUARY 21 – 24, 2025**

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Horizon Cable TV (Horizon):

- Communication Facilities Inspection Procedure (GO 95 & 128), version April 17, 2012
- Facility statistics as of December 2024, including miles of overhead lines, miles of underground lines, number of poles, and number of underground structures.
- Overhead and Underground facility maps as of December 2024.
- Inspection and patrol records with the inspected facility type, facility location, high fire threat district location, inspection date, and resulting inspection findings and repairs from December 2019 through December 2024.
- Safety Hazards Notifications received from third-party utilities from December 2019 through December 2024.
- Pole loading calculations and new construction projects, 2018 through 2022
- Employee statistics and qualifications, December 2019 through December 2024.

II. Records Violations

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

1. General Order (GO) 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property.

- (1) 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.*

Upon completion of the corrective action, the company’s records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.

- (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 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 GO 95.*

- (5) A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at*

least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party.”

GO 95, Rule 18-B(1), 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 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.”*

a. Horizon does not record any third-party issues identified during inspections. *Horizon Cable TV, Inc. Communication Facilities Inspection Procedure* includes the language from GO 95, Rule 18-A, which requires utilities to record and maintain documentation of notifications sent and received for third-party issues for 10 years. Horizon stated that if there is a serious safety hazard they will contact the appropriate utility via phone, but do not maintain records of the calls or the third-party issues identified.

- b. Horizon follows the GO 95 guidelines for priority levels and includes the different priority levels and timeframes in the *Horizon Cable TV, Inc. Communication Facilities Inspection Procedure*. However, Horizon's inspection records provide the completion date but do not specify due dates or timeframes (in months/years) for the required work. The inspection records provide the priority level for each issue identified as follows:

PRIORITY LEVELS

- 1 – Take action immediately
- 2 – Variable (non-immediate)
- 3 – Acceptable safety/reliability

GO 95, Rule 18-B requires utilities to take corrective actions to resolve any non-conformances in set timeframes based on priority levels. Without specifying due dates or timeframes in work orders, Horizon cannot ensure their timely resolution as required by GO 95.

2. GO 95, Rule 80.1-A(4), Record Keeping states:

“Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a).”

- a. GO 95, Rule 80.1(A) requires utilities to maintain the records of inspections for 10 years, including the date and result of the inspections conducted. Horizon stated that they complete drive-by patrols approximately monthly and perform annual inspections of all facilities. However, while Horizon records any issues identified during patrols and inspections on their work order Google Sheet, they do not maintain records of the date of patrols and inspections or any notation of inspected facilities. Horizon needs to maintain a record of the patrols and inspections conducted and the results, including documentation of patrols and inspections that did not generate any corrective actions as required by GO 95, Rule 80.1-A(4).
- b. GO 95, Rule 80.1(A) requires utilities to maintain the records of corrective actions for 10 years. Horizon tracks their work orders and any non-conformances identified during inspections in a Google Sheet, however the records provided to ESRB only listed 22 issues from 2018 to 2023. Horizon stated that they previously deleted completed work from the spreadsheet and the list provided to ESRB did not include all work completed in the last five years. Additionally, *Horizon Cable TV, Inc. Communication Facilities Inspection Procedure* does not include any requirements to maintain records for 10 years. Horizon has updated their practices and now keeps record of all pending and completed work.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Structure Type	Address	City	GPS Coordinates
1	Underground Pedestal	Corner of Toby Street and Mesa Road	Point Reyes Station	38.06872, -122.80528
2	Underground Pedestal	17 Toby Street	Point Reyes Station	38.06911, -122.80487
3	Underground Pedestal	12 Toby Street	Point Reyes Station	38.06898, -122.80485
4	Underground Pedestal	20 Toby Street	Point Reyes Station	38.06926, -122.80397
5	Underground Pedestal	2 Giacomini Road	Point Reyes Station	38.06771, -122.80354
6	Underground Pedestal	9 Giacomini Road	Point Reyes Station	38.06785, -122.802759
7	Underground Pedestal	16 Giacomini Road	Point Reyes Station	38.068012, -122.801818
8	Underground Pedestal	23 Giacomini Road	Point Reyes Station	38.068137, -122.801377
9	Underground Pedestal	31 Giacomini Road	Point Reyes Station	38.068443, -122.800872
10	Pole	Corner of 2nd Street and B Street	Point Reyes Station	38.066931, -122.806288
11	Pole	250 B Street	Point Reyes Station	38.067322, -122.806646
12	Pole	Corner of 3rd Street and B Street	Point Reyes Station	38.067562, -122.806916
13	Pole	160 3rd Street	Point Reyes Station	38.067266, -122.807289
14	Pole	3rd Street and C Street	Point Reyes Station	38.066989, -122.807648
15	Pole	4th Street and C Street	Point Reyes Station	38.067535, -122.808305
16	Pole	4th Street and B Street, Across from West Marin Real Estate	Point Reyes Station	38.068068, -122.807527
17	Pole	Along B Street between 4th and 5th Street	Point Reyes Station	38.068338, -122.807896
18	Pole	Corner of 5th Street and B Street	Point Reyes Station	38.068587, -122.808212
19	Pole	45 5th Street	Point Reyes Station	38.068895, -122.807827
20	Pole	Corner of 5th Street and A Street	Point Reyes Station	38.069196, -122.807508
21	Pole	125 A Street	Point Reyes Station	38.068994, -122.807125
22	Pole	Via de la Vista and Camino Del Mar	Inverness	38.111191, -122.867095
23	Pole	120 Camino Del Mar	Inverness	38.111554, -122.86765
24	Pole	130 Camino Del Mar	Inverness	38.111724, -122.868245
25	Pole	150 Camino Del Mar	Inverness	38.111763, -122.8689
26	Pole	172 Camino Del Mar	Inverness	38.112137, -122.869619

27	Pole	180 Camino Del Mar	Inverness	38.11241, -122.869861
28	Pole	105 Kehoe Way	Inverness	38.10702, -122.86642
29	Pole	One pole past Kehoe Way and Woodhaven	Inverness	38.107354, -122.865872
30	Pole	Kehoe Way and Woodhaven	Inverness	38.107657, -122.866031
31	Pole	60 Woodhaven	Inverness	38.107705, -122.865696
32	Pole	Madrone Avenue and Vision Road	Inverness	38.100954, -122.863631
33	Pole	175 Madrone Avenue	Inverness	38.101014, -122.863222
34	Pole	5 Madrone Avenue	Inverness	38.100745, -122.864085
35	Pole	Madrone Avenue and Vision Road	Inverness	38.100627, -122.864787
36	Pole	25 Inverness Way South	Inverness	38.096782, -122.853559
37	Pole	27 Inverness Way South	Inverness	38.096547, -122.853982
38	Pole	40 Inverness Way North	Inverness	38.096979, -122.854111
39	Pole	Corner of Hawthornden Way and Inverness Way North	Inverness	38.097107, -122.854523
40	Pole	192 Hawthornden Way	Inverness	38.097137, -122.855159
41	Pole	1 W. Robert Drive	Inverness	38.078079, -122.839713
42	Pole	Corner of E. Robert Drive and W. Robert Drive	Inverness	38.078315, -122.840189
43	Pole	W. Robert Drive and Drakes View Drive	Inverness	38.077458, -122.839839
44	Pole	Along Drakes View Drive	Inverness	38.076769, -122.840013
45	Pole	End of Elizabeth Place	Inverness	38.071787, -122.849141
46	Pole	25 Elizabeth Place	Inverness	38.071842, -122.848953
47	Pole	Third pole from end of Elizabeth Place, Casa de Dragones	Inverness	38.07245, -122.849137
48	Pole	15 Elizabeth Place	Inverness	38.073042, -122.849711
49	Pole	20 Elizabeth Place	Inverness	38.073493, -122.849718
50	Pole	155 Vallejo Avenue	Inverness	38.068903, -122.828785
51	Pole	160 Vallejo Avenue	Inverness	38.068894, -122.829394
52	Pole	Vallejo Avenue and Portola Avenue	Inverness	38.068848, -122.828061
53	Pole	Along Vallejo Avenue, one pole past intersection with Portola Avenue	Inverness	38.069147, -122.827421
54	Pole	87 Vallejo Avenue	Inverness	38.069371, -122.826864
55	Fiber Cabinet (FTTH)	Corner of Park Avenue and Brighton Avenue	Bolinas	37.907455, -122.686846
56	Pole	Elm Road and Kale Road	Bolinas	37.899631, -122.702725
57	Pole	210 Kale Road	Bolinas	37.899895, -122.703007
58	Pole	250 Kale Road	Bolinas	37.900321, -122.703399
59	Pole	283 Kale Road	Bolinas	37.900644, -122.703684
60	Pole	240 Elm Road	Bolinas	37.899743, -122.702383
61	Pole	Juniper Road and Elm Road	Bolinas	37.900032, -122.70206

62	Pole	Opal Road, near corner of Opal Road and Kale Road (one pole past)	Bolinas	37.901012, -122.705148
63	Pole	2 Opal Road, Quail Refuge	Bolinas	37.900967, -122.705617
64	Pole	4 Opal Road	Bolinas	37.901106, -122.706235
65	Pole	262 Larch Road	Bolinas	37.901715, -122.706821
66	Pole	435 Locust Road	Bolinas	37.902198, -122.707182
67	Pole	22 Crescent Avenue	Bolinas	37.908478, -122.683916
68	Pole	Corner of Altura Avenue and Crescent Avenue	Bolinas	37.908774, -122.6834
69	Pole	66 Crescent Avenue	Bolinas	37.908287, -122.683004
70	Pole	59 Altura Avenue	Bolinas	37.908876, -122.683319
71	Pole	Corner of Shoreline Highway and Calle Del Mar, across from Stinson Beach Market	Stinson Beach	37.898587, -122.639738
72	Pole	Corner of Shoreline Highway and Calle Del Mar	Stinson Beach	37.898439, -122.639767
73	Pole	Along Village Green Park	Stinson Beach	37.898153, -122.639845
74	Pole	Parkside Café	Stinson Beach	37.897793, -122.63992
75	Pole	Parkside Marketplace, along Arenal Avenue	Stinson Beach	37.897754, -122.639419
76	Pole	85 Laurel Avenue	Stinson Beach	37.900808, -122.638306
77	Pole	70 Laurel Avenue	Stinson Beach	37.900543, -122.63831
78	Pole	50 Laurel Avenue	Stinson Beach	37.900226, -122.638306
79	Pole	Calle Del Embarcadero and Calle Del Arroyo	Stinson Beach	37.900995, -122.64615
80	Pole	9 Calle Del Embarcadero	Stinson Beach	37.900666, -122.646392
81	Pole	24 Calle Del Embarcadero	Stinson Beach	37.900293, -122.646682
82	Pole	Stinson Beach Fire Protection Department	Stinson Beach	37.901323, -122.646632
83	Pole	7 Calle Del Occidente	Stinson Beach	37.901167, -122.6468
84	Pole	19 Calle Del Occidente	Stinson Beach	37.900896, -122.647045
85	Pole	Across from 187 Calle Del Arroyo	Stinson Beach	37.903872, -122.651996
86	Pole	Sonoma Patio and Calle Del Arroyo	Stinson Beach	37.903778, -122.651796
87	Underground Pedestal	104 Seadrift Road	Stinson Beach	37.903926, -122.653212
88	Underground Vault	110 Seadrift Road	Stinson Beach	37.903772, -122.653622
89	Underground Vault	116 Seadrift Road	Stinson Beach	37.90397, -122.654124
90	Underground Vault	121 Seadrift Road	Stinson Beach	37.9043, -122.65459
91	Underground Vault	130 Seadrift Road	Stinson Beach	37.90463, -122.655554
92	Underground Vault	140 Seadrift Road	Stinson Beach	37.904888, -122.656294

93	Underground Vault	101 Seadrift Road	Stinson Beach	37.904242, -122.652953
94	Underground Pedestal	8 Dipsea Road	Stinson Beach	37.905152, -122.6527
95	Underground Vault	9 Dipsea Road	Stinson Beach	37.905188, -122.652823
96	Underground Vault	17 Dipsea Road	Stinson Beach	37.905714, -122.652853
97	Underground Pedestal	31 Dipsea Road	Stinson Beach	37.906308, -122.654262
98	Underground Vault	35 Dipsea Road	Stinson Beach	37.906381, -122.654551
99	Underground Pedestal	39 Dipsea Road	Stinson Beach	37.906497, -122.65483
100	Underground Pedestal	41 Dipsea Road	Stinson Beach	37.906649, -122.655448
101	Underground Pedestal	47 Dipsea Road	Stinson Beach	37.906831, -122.656003
102	Underground Pedestal	53 Dipsea Road	Stinson Beach	37.906987, -122.656492
103	Underground Vault	65 Dipsea Road	Stinson Beach	37.907375, -122.657746
104	Pole	108 South Dream Farm Road	Inverness	38.087343, -122.844421
105	Pole	One pole past 100 South Dream Fram Road	Inverness	38.086804, -122.844308
106	Pole	One pole down driveway to 118 and 128 South Dream Farm Road	Inverness	38.087046, -122.845003
107	Pole	Two poles down driveway to 118 and 128 South Dream Farm Road	Inverness	38.08721, -122.845351
108	Pole	118 South Dream Farm Road	Inverness	38.087166, -122.845753
109	Pole	9 Vallejo Avenue	Inverness	38.069169, -122.825049
110	Pole	Sir Francis Drake Boulevard and Vallejo Avenue	Inverness	38.069489, -122.824658
111	Pole	Along Sir Francis Drake Boulevard, across from IP Market	Inverness	38.069777, -122.824903
112	Pole	Along Sir Francis Drake Boulevard, across from Cadiz Vacation Rental	Inverness	38.064275, -122.821852
113	Pole	14 Portola Avenue	Inverness	38.063788, -122.821868
114	Pole	2 Portola Avenue	Inverness	38.0635, -122.822022
115	Pole	Balboa Avenue and Portola Avenue	Inverness	38.063753, -122.822465
116	Pole	24 Balboa Avenue	Point Reyes Station	38.062591, -122.813853
117	Pole	Along Sir Francis Drake Boulevard	Point Reyes Station	38.062154, -122.815247
118	Pole	Along Sir Francis Drake Boulevard	Point Reyes Station	38.061785, -122.816561

119	Pole	Along Sir Francis Drake Boulevard	Point Reyes Station	38.064512, -122.808156
120	Pole	Along Sir Francis Drake Boulevard, across from Dixie Rose Ranch	Point Reyes Station	38.064427, -122.807374
121	Pole	11191 Sir Francis Drake Boulevard	Point Reyes Station	38.064361, -122.806633
122	Pole	Across from 11180 Sir Francis Drake Boulevard	Point Reyes Station	38.064317, -122.805849
123	Pole	Across from 11160 Sir Francis Drake Boulevard	Point Reyes Station	38.064327, -122.805877
124	Pole	11160 Sir Francis Drake Boulevard	Point Reyes Station	38.06872, -122.80528

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

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

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

ESRB’s findings related to the above rule are listed in Table 1:

Table 1: GO 95, Rule 31.1 Findings

Location	Findings
22	The pole is missing an anchor. Horizon has an existing work order for this issue.
34	The lashing wire is loose between Location 34 and Location 35.
35	The pole has an incomplete facilities transfer. Horizon has an existing work order for this issue.
36	The pole has an incomplete facilities transfer. Horizon has an existing work order for this issue.
50	The pole has a broken lashing wire.
53	The pole has a broken lashing wire.
62	The pole has a broken lashing wire.
66	The pole has an incomplete facilities transfer.

2. 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.”

ESRB’s finding related to the above rule is listed in Table 2:

Table 2: GO 95, Rule 31.6 Finding

Location	Finding
116	The pole has two abandoned drops wrapped around a guy wire and the pole.

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. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule.”

ESRB’s findings related to the above rule are listed in Table 3:

Table 3: GO 95, Rule 35 Findings

Location	Findings
25	Vegetation is causing strain and abrasion on the communication lines, and a tree branch is splitting the conductor.
36	Vegetation is causing strain and abrasion on the communication lines. Horizon has an existing work order to transfer the facilities on this pole.
70	Vegetation is causing strain and abrasion on the communication lines.

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 s 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 18C: The radial separation between guys and span wires passing communication conductors (including open wire, cables, and service drops) supported on the same poles must be at least 3 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.

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 the above rule are listed in Table 4:

Table 4: GO 95, Rule 38 Findings

Location	Findings
16	The conductors are in contact with AT&T facilities in two locations. Horizon fixed this issue in the field.
20	The conductor has Phone facilities attached and an unsecured drop. Horizon fixed this issue in the field.
27	The service drop to 180 Camino Del Mar is in contact with the Horizon anchor down guy and needs repair.
36	The conductors are in contact with AT&T facilities. Horizon has an existing work order to transfer the facilities on this pole.
42	The unsecured drop is in contact with other facilities.
77	The service drop to 70 Laurel Avenue is in contact with AT&T facilities.
79	The conductor is in contact with PG&E primary anchor down guy.
111	The drop is in contact with AT&T facilities.
113	The service drop to 6 Portola Avenue is attached to the AT&T drop.

5. 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 finding related to the above rule is listed in Table 5:

Table 5: GO 95, Rule 84.6-B Finding

Location	Finding
122	The vertical ground wire is exposed, and the protective moulding cover is missing.

6. GO 95, Rule 84.8-C, Service Drops, Clearances above Ground and Buildings states:

“(1) Above Public Thoroughfares: Vertical clearance shall not be less than 18 feet.

EXCEPTION: Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line. In no case shall the clearance at the center line be less than 18 feet. Where there are no curbs, the foregoing provisions shall apply using the outer limits of normal longitudinal vehicular movement in lieu of a curb line.

(1) Above Private Thoroughfares or Private property:

(a) Industrial and Commercial Premises: Over private driveways, lanes or property accessible to vehicles, service drops shall not be less than 16 feet.

(b) Residential Premises: Over residential driveways, lanes or over property accessible to vehicles, service drops shall not be less than 12 feet.

EXCEPTION: If the building served does not permit an attachment which will provide this 12 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 10 feet.”

ESRB’s findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 84.8-C Findings

Location	Findings
36	The service drop to 25 Inverness Way South is approximately 9ft above a residential driveway and does not meet the minimum clearance requirement. Horizon has an existing work order to transfer the facilities on this pole.
51	The conductor between Location 50 and Location 51 is sagging below AT&T facilities and does not meet the minimum clearance requirements.

7. GO 95, Rule 86.2, Guys, Use states in part:

“Where mechanical loads imposed on poles, towers or structures are greater than can be supported with the safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.

Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire stress, the pole below the point of guy attachment acting merely as a strut.

Guys shall be attached to structures as nearly as practicable at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.”

ESRB’s findings related to the above rule are listed in Table 7:

Table 7: GO 95, Rule 86.2 Findings

Location	Findings
47	The anchor down guy is slack. Horizon fixed this issue in the field.
53	The anchor down guy is slack.
74	The anchor down guy is slack.
124	The anchor down guy is slack.

8. **GO 95, Rule 86.7-B, Location of Sectionalizing Insulators, Anchor Guys** states in part:

“In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule 86.7–B.”

ESRB’s finding related to the above rule is listed in Table 8:

Table 8: GO 95, Rule 86.7-B Finding

Location	Finding
29	Vegetation above the down guy insulator is contacting and grounding the anchor guy.

9. **GO 95, Rule 86.9, Guy Marker (Guy Guard)** states:

“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.”

ESRB’s findings related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 86.9 Findings

Location	Findings
15	The anchor down guy has a missing guy guard.
124	The anchor down guy has a missing guy guard.

10. **GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground** states:

“Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8”

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

Table 10: GO 95, Rule 87.7-D(1) Findings

Location	Findings
86	The riser guard is missing and exposing the underground service drops, which are unattached to the pole.
108	The riser guard is missing and exposing the service drops.

11. 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.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.”

ESRB’s finding related to the above rule is listed in Table 11:

Table 11: GO 128, Rule 17.1 Finding

Location	Finding
1	The pedestal enclosure is damaged and needs replacement. Horizon has an existing work order for this issue.

12. 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 findings related to the above rule are listed in Table 12:

Table 12: GO 128, Rule 17.8 Findings

Location	Findings
1	The pedestal is missing an ownership marking.
2	The pedestal is missing an ownership marking.
3	The pedestal is missing an ownership marking.
4	The pedestal is missing an ownership marking.
5	The pedestal is missing an ownership marking.
6	The pedestal is missing an ownership marking.
7	The pedestal is missing an ownership marking.
8	The pedestal is missing an ownership marking.
9	The pedestal is missing an ownership marking.
55	The cabinet is missing an ownership marking.
87	The pedestal is missing an ownership marking.
88	The vault is missing an ownership marking.
89	The vault is missing an ownership marking.
90	The vault is missing an ownership marking.
91	The vault is missing an ownership marking.
92	The vault is missing an ownership marking.
93	The vault is missing an ownership marking.
94	The pedestal is missing an ownership marking.
95	The vault is missing an ownership marking.

Location	Findings
96	The vault is missing an ownership marking.
97	The pedestal is missing an ownership marking.
98	The vault is missing an ownership marking.
99	The pedestal is missing an ownership marking.
100	The pedestal is missing an ownership marking.
101	The pedestal is missing an ownership marking.
102	The pedestal is missing an ownership marking.
103	The vault is missing an ownership marking.

V. Observations

1. GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities states in part:

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property...”

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

- “(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 GO 95.”*

During the field inspection, ESRB observed the third-party safety concerns listed in Table 13:

Table 13: Third-Party Observations

Location	Observations
11	PG&E has a third-party attachment on the pole.
12	AT&T has an incomplete facilities transfer on the pole.
19	PG&E has an exposed ground wire. AT&T has an abandoned drop.
26	AT&T has vegetation causing strain and abrasion on service drops.
27	AT&T has a drop in contact with a Horizon guy wire.
28	AT&T has a riser guard below 8ft.
31	AT&T has unsecured service drops and missing a riser guard.

Location	Observations
34	AT&T has an abandoned drop.
36	AT&T has a low hanging service drop to 25 South Inverness Way with approximately 7.5ft clearance.
37	AT&T has an abandoned drop and service drops in contact with PG&E guy above the insulator bob.
39	AT&T has low hanging service drop attached to a tree.
48	AT&T has a loose lashing wire and unsecured equipment and drops.
50	AT&T has service drops wrapped around and in contact with Horizon lines.
53	AT&T has a slack anchor down guy.
58	AT&T has a low hanging drop.
60	AT&T has an abandoned drop.
62	AT&T has a loose lashing wire.
63	AT&T has a slack anchor down guy.
66	AT&T has an incomplete facilities transfer on the pole.
73	AT&T has a broken lashing wire.
75	PG&E has a potentially leaning pole.
85	AT&T has unsecured facilities and a missing riser guard.
86	AT&T has a slack anchor down guy and low hanging conductors approximately 11ft clearance.
113	AT&T has a service drop to 6 Portola Avenue attached to Horizon facilities.
114	AT&T has an abandoned drop.
115	AT&T has an abandoned drop.
116	AT&T has two abandoned drops.
124	AT&T has a loose lashing wire.