

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 13, 2025

CA2025-1311

Jane Whang
Government Affairs
Verizon Communications Inc. (Verizon)
360 Spear St.
San Francisco, CA 94105

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Verizon – Sacramento
County Group Service Areas

Ms. Whang:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez, Thomas Roberts, and Rafael Herranz of ESRB conducted a CIP audit of Verizon's Sacramento County Group Service Areas from February 3, 2025 through February 7, 2025. During the audit, ESRB staff conducted field inspections of Verizon's communications facilities and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than **July 15, 2025**, by electronic copy of all corrective actions and preventive measures taken by Verizon to correct the identified violations and prevent the recurrence of 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 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 Brandon Vazquez at (628) 249-2867 or Brandon.Vazquez@cpuc.ca.gov.

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 CIP Audit Report for Verizon – Sacramento County Group Service Areas

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Yi "Rocky" Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC
Thomas Roberts, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Rafael Herranz, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Rex Knowles, Director of Government Affairs, Verizon

CPUC AUDIT FINDINGS
VERIZON – SACRAMENTO COUNTY GROUP SERVICE AREAS
FEBRUARY 3-7, 2025

I. Records Review

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

- Verizon’s facilities statistics.
- Verizon's List of Facility Locations.
- Verizon’s Contractor’s Overhead General Order (GO) 95 Inspection Program and Guidelines
- Overhead GO 95 Patrol and Detailed-Inspection records for the last five years (December 2019 – December 2024).
- Work order records for the last five years (December 2019 – December 2024).
- Third Party Safety Hazard notifications for the last five years (December 2019 – December 2024).
- Pole loading and safety factor calculations completed in the last twelve months (December 2023 – December 2024).

II. Records Violations

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

1. GO 95, Rule 18-B1(a), Maintenance Programs states in part:

“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’s review of Verizon’s work orders from December 2019 through December 2024 found that Verizon had one (1) late-pending work order and one (1) late-completed work order out of 43 total work orders. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-completed work orders are work orders that were completed past their assigned due date based on their hazard level. The sections below provide background on the two (2) late work orders.

Late-Completed Work Order

Work Order # 1181 was identified on 12/14/2021 as a Priority 1c¹ for insufficient clearance between Verizon fiber and power lines in a Tier 2 High Fire-Threat District (HFTD) with a Required Due Date of 1/13/2022. Verizon did not repair the clearance infraction until 11/8/2022, 299 days after the Due Date.

Late-Pending Work Order

Work Order # 1178 was identified on 12/14/2021 as a Priority 2a² for insufficient clearance between Verizon fiber and a third-party comms line in a Tier 2 HFTD with a Required Due Date of 12/14/2022. Verizon has not yet completed repair work for the clearance infraction as of its 1/17/2025 Pre-Audit Data Request Response, 765 days after the Due Date.

2. GO 95, Rule 31.2, Inspection of Lines states:

“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-A(2), Statewide Inspection Requirements states in part:

“Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State.”

In response to the Alameda County Group audit in January 2025³, Verizon stated it

¹ According to Verizon’s procedures, Priority 1c conditions must be repaired within 30 days.

² According to Verizon’s procedures, Priority 2a conditions must be repaired within 12 months or temporarily repaired and reclassified.

³ Verizon’s California Wireline Pole Inspection and Maintenance Program Statement of Work – Provided in Verizon’s response to the CA2025-1265 Alameda County Group audit report.

conducts patrol inspections of overhead fiber lines every 10 years in non-HFTD areas. During the audit of Verizon's Sacramento County Group, Verizon could not provide any overhead patrol inspection records for non-HFTD areas in the last five years from December 2019 through December 2024. Given Verizon has 4,392 poles in Sacramento County, ESRB expects Verizon to inspect around 439 poles annually if it staggers its inspections each year to meet its 10-year cycle. Therefore, ESRB finds that Verizon lacks sufficient evidence to demonstrate it maintains and inspects its overhead fiber facilities in non-HFTD areas in accordance with GO 95, Rules 31.2 and 80.1-A(2).

3. GO 128, Rule 12.2, Maintenance states:

"Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules."

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."

GO 128, Rule 17.2, Inspection states in part:

"Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules."

In response to the Alameda County Group audit in January 2025, Verizon stated that it inspects its underground equipment during its course of normal business operations.⁴ ESRB finds that this practice is not documented anywhere in Verizon's procedures. Additionally, during the audit of Verizon's Sacramento County Group, Verizon could not provide any underground inspection records in the last five years from December 2019 through December 2024. ESRB asserts that having a documented inspection procedure and retaining inspection records is accepted good practice. Therefore, ESRB finds that Verizon lacks sufficient evidence to demonstrate it maintains and inspects its underground equipment in accordance with GO 128, Rules 12.2, 17.1 and 17.2.

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

⁴ Verizon CA2025-1265 Alameda County Group Post-Audit Data Request #1 – Response to Question #2, February 8, 2025, and Audit Report Response Follow-up Data Request #1 – Response to Question #1, May 30, 2025.

“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).”

The location information for Verizon’s facilities is inaccurate. During the audit, ESRB attempted to inspect several overhead (OH) facilities based on the addresses and Global Positioning System (GPS) coordinates provided in Verizon’s records. For example, ESRB attempted to visit facilities indicated as OH fiber in Verizon’s OH Pole KMZ Map, listed in Table 1 below. Verizon’s records indicated these locations as existing OH fiber facilities per its January 31, 2025 Pre-Audit Data Request Response. However, ESRB could not locate these facilities during the field audit.

Table 1: Incorrect OH Map Locations

| Location | GPS Coordinates | Description | Field-Verified Date |
|----------|------------------------|--|---------------------|
| 35 | 38.409632, -121.362246 | Verizon OH fiber is listed in records; however, only underground vault found in field. | None |
| 71 | 38.649518, -121.308192 | Verizon OH fiber not on comms-only pole even though it is listed in records. | 10/26/2020 |

Additionally, ESRB found that several of Verizon’s patrol and detailed inspection records note “No VzB at Pole,” meaning there are no Verizon facilities on the poles. Despite this, Verizon continues to inspect these poles every year or every other year depending on the HFTD requirements. Verizon must verify its facility records to ensure the accuracy of its facility locations and eliminate inefficiencies with its inspection program.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

| Location | Structure ID | Structure Type | GPS Coordinates |
|----------|--------------|---------------------------|------------------------|
| 1 | 192849 | Joint Wood Pole - Antenna | 38.627063, -121.539757 |
| 2 | | Vault | 38.627075, -121.539729 |
| 3 | 190628 | Joint Wood Pole - Antenna | 38.650775, -121.457031 |
| 4 | | Vault | 38.65072, -121.456959 |
| 5 | 193120 | Joint Wood Pole - Antenna | 38.658537, -121.44818 |
| 6 | 123280 | Joint Wood Pole - Antenna | 38.643504, -121.447858 |
| 7 | 155944 | Joint Wood Pole | 38.643034, -121.447841 |
| 8 | 123278 | Joint Wood Pole | 38.642818, -121.447866 |
| 9 | 186680 | Joint Wood Pole | 38.642666, -121.447862 |
| 10 | 192746 | Joint Wood Pole - Antenna | 38.630357, -121.429216 |
| 11 | 123320 | Joint Wood Pole | 38.630088, -121.429203 |
| 12 | 188990 | Joint Wood Pole - Antenna | 38.61708, -121.448877 |
| 13 | 194580 | Joint Wood Pole - Antenna | 38.606744, -121.442797 |
| 14 | 188739 | Joint Wood Pole - Antenna | 38.602148, -121.424658 |
| 15 | 195176 | Joint Wood Pole - Antenna | 38.584695, -121.4849 |
| 16 | | Comms-Only Wood Pole | 38.584478, -121.484031 |
| 17 | 192900 | Joint Wood Pole - Antenna | 38.580266, -121.485789 |
| 18 | 191106 | Joint Wood Pole - Antenna | 38.581476, -121.474968 |
| 19 | 191114 | Joint Wood Pole - Antenna | 38.564234, -121.453958 |
| 20 | 190309 | Joint Wood Pole - Antenna | 38.561948, -121.44601 |
| 21 | 018711 | Joint Wood Pole | 38.561931, -121.445903 |
| 22 | 018719 | Joint Wood Pole | 38.562391, -121.445709 |
| 23 | 191510 | Joint Wood Pole | 38.562705, -121.445628 |
| 24 | 018721 | Joint Wood Pole | 38.563137, -121.445371 |
| 25 | 191182 | Joint Wood Pole - Antenna | 38.54224, -121.423194 |
| 26 | 192287 | Joint Wood Pole - Antenna | 38.525723, -121.522253 |
| 27 | 080824 | Joint Wood Pole - | 38.484102, -121.505263 |

| | | Antenna | |
|----|------------|----------------------|------------------------|
| 28 | | Vault | 38.394336, -121.418022 |
| 29 | | Vault | 38.394499, -121.418009 |
| 30 | | Vault | 38.394861, -121.417995 |
| 31 | FTR 702359 | Comms-Only Wood Pole | 38.394944, -121.417977 |
| 32 | FTR 702358 | Comms-Only Wood Pole | 38.395402, -121.417941 |
| 33 | FTR 702357 | Comms-Only Wood Pole | 38.395584, -121.41795 |
| 34 | | Comms-Only Wood Pole | 38.395915, -121.417927 |
| 35 | | Vault | 38.409632, -121.362246 |
| 36 | | Vault | 38.409614, -121.362866 |
| 37 | | Vault | 38.40958, -121.363335 |
| 38 | 168210 | Joint Wood Pole | 38.526806, -121.390629 |
| 39 | 169569 | Joint Wood Pole | 38.527541, -121.390594 |
| 40 | 111732 | Joint Wood Pole | 38.528272, -121.390603 |
| 41 | 185102 | Joint Wood Pole | 38.528833, -121.390608 |
| 42 | 084025 | Joint Wood Pole | 38.554784, -121.335448 |
| 43 | 084024 | Joint Wood Pole | 38.554777, -121.334444 |
| 44 | 54441 | Joint Wood Pole | 38.554875, -121.333436 |
| 45 | 54442 | Joint Wood Pole | 38.554777, -121.333461 |
| 46 | 54444 | Joint Wood Pole | 38.555085, -121.332578 |
| 47 | 184524 | Steel Pole | 38.595969, -121.304752 |
| 48 | 41605 | Joint Wood Pole | 38.596382, -121.304719 |
| 49 | 180263 | Joint Wood Pole | 38.596829, -121.304401 |
| 50 | 041692 | Joint Wood Pole | 38.596941, -121.304552 |
| 51 | | Comms-Only Wood Pole | 38.596672, -121.304785 |
| 52 | 48375 | Joint Wood Pole | 38.618475, -121.266311 |
| 53 | 181052 | Joint Wood Pole | 38.61862, -121.265489 |
| 54 | 48373 | Joint Wood Pole | 38.618801, -121.264616 |
| 55 | 87760 | Joint Wood Pole | 38.654402, -121.181186 |
| 56 | 87761 | Joint Wood Pole | 38.654021, -121.181085 |
| 57 | 6606 | Joint Wood Pole | 38.656509, -121.170078 |
| 58 | 6605 | Joint Wood Pole | 38.656587, -121.16897 |
| 59 | 6614 | Joint Wood Pole | 38.656207, -121.168817 |
| 60 | 86045 | Joint Wood Pole | 38.711069, -121.225504 |
| 61 | | Comms-Only Wood Pole | 38.711349, -121.225248 |
| 62 | 86020 | Joint Wood Pole | 38.711303, -121.224885 |
| 63 | 181593 | Joint Wood Pole | 38.71127, -121.224215 |
| 64 | | Comms-Only Wood Pole | 38.711283, -121.224166 |
| 65 | 86018 | Joint Wood Pole | 38.711274, -121.223565 |
| 66 | 170979 | Joint Wood Pole | 38.68741, -121.239703 |
| 67 | 50309 | Joint Wood Pole | 38.686827, -121.239721 |
| 68 | 50307 | Joint Wood Pole | 38.686322, -121.239771 |
| 69 | 95622 | Joint Wood Pole | 38.652516, -121.264461 |
| 70 | 95619 | Joint Wood Pole | 38.652095, -121.264338 |

| | | | |
|----|--------|------------------------------|------------------------|
| 71 | | Comms-Only Wood Pole | 38.649518, -121.308192 |
| 72 | 178718 | Joint Wood Pole | 38.613367, -121.326378 |
| 73 | 73454 | Joint Wood Pole | 38.613352, -121.326643 |
| 74 | 73453 | Joint Wood Pole | 38.613356, -121.327195 |
| 75 | 1648 | Comms-Only Wood Pole | 38.595266, -121.364448 |
| 76 | 1634 | Comms-Only Wood Pole | 38.594877, -121.364411 |
| 77 | 118815 | Joint Wood Pole | 38.59447, -121.364412 |
| 78 | | Comms-Only Wood Pole | 38.594074, -121.364392 |
| 79 | | Joint Wood Pole - Antenna | 38.438228, -121.405815 |
| 80 | | Vault | 38.43818, -121.405713 |
| 81 | | Vault | 38.438162, -121.405811 |
| 82 | 190632 | Joint Wood Pole - Antenna | 38.474238, -121.415639 |
| 83 | 193973 | Joint Wood Pole - Antenna | 38.476015, -121.410653 |
| 84 | 150983 | Joint Wood Pole | 38.4959, -121.418738 |
| 85 | 148250 | Joint Wood Pole | 38.496139, -121.418284 |
| 86 | 148231 | Joint Wood Pole - Antenna | 38.496121, -121.417822 |
| 87 | 150996 | Joint Wood Pole - Antenna | 38.496106, -121.424236 |
| 88 | | Comms-Only Wood Pole | 38.496116, -121.423895 |
| 89 | 48656 | Joint Wood Pole - Antenna | 38.51047, -121.476299 |
| 90 | 99031 | Joint Wood Pole - Antenna | 38.522026, -121.477329 |

IV. Field Inspection Violations

ESRB observed 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.”

| Location | Violation Description |
|----------|---|
| 3 | Conduit for breaker box loose. |
| 5 | Antenna crossarm crooked and hardware backing off slightly. |
| 9 | Verizon tracer bundled and left at bottom of pole. |
| 15 | Gap on conduit below disconnect box. |
| 17 | Disconnect box damaged/crooked. Verizon has an open work order 580001 to repair the disconnect box. |
| 25 | Loose fitting on conduit of disconnect box. |
| 64 | Verizon buddy pole. |
| 66 | Dead-end fiber riser cut and bundled on pole. |

2. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 8 Column C states:

“The basic minimum allowable 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 is 12 inches.”

| Location | Violation Description |
|----------|--|
| 6 | Verizon drip loop has low clearance to Comcast line. |
| 10 | Verizon drip loop touching Comcast messenger. |
| 21 | Verizon drip loop touching Comcast line. |
| 23 | Verizon fiber contacting Consolidated fiber. |
| 31 | Verizon fiber lashed to Frontier line. |
| 73 | Verizon snowshoe touching Consolidated fiber. |
| 82 | Verizon drip loop less than 12 inches from Comcast. |
| 86 | Verizon drip loop contacting Comcast line. |

3. GO 95, Rule 35, Vegetation Management states in part:

“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.”

| Location | Violation Description |
|----------|--|
| 7 | Verizon line has vegetation strain/abrasion. |
| 42 | Verizon line has vegetation strain/abrasion. |
| 43 | Verizon line has vegetation strain/abrasion. |
| 50 | Verizon line has vegetation strain/abrasion. |
| 51 | Verizon line has vegetation strain/abrasion. |
| 62 | Verizon line has vegetation strain/abrasion. |
| 88 | Verizon line has vegetation strain/abrasion. |

4. 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).”

| Location | Violation Description |
|----------|--|
| 11 | Exposed ground wire and broken molding. |
| 20 | Disconnect box ground molding damaged and ground wire exposed. |

| | |
|----|---|
| 38 | Exposed ground wire. |
| 51 | Exposed ground wire and broken molding. |

5. 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.”

| Location | Violation Description |
|----------|--|
| 14 | Riser cover loose at bottom of pole and riser exposed. |
| 31 | Riser cover loose at bottom of pole and riser exposed. |

6. 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.”

| Location | Violation Description |
|----------|------------------------------|
| 20 | Shoes hanging on fiber line. |

7. GO 95, Rule 92.4-C(1), Grounding, Grounding Conductors states in part:

“The grounding conductors of the communication messenger system shall conform to each of the following requirements [...]:

(c) The grounding conductor from the ground rod (ground electrode) to the

messenger shall be continuous, unless suitable electrical compression connections are used.”

| Location | Violation Description |
|----------|--------------------------|
| 31 | Verizon cut ground wire. |

8. 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.”

| Location | Violation Description |
|----------|--|
| 51 | Down guy marker loose and missing high-vis strips. |

9. GO 95, Rule 92.4-D(1), Exposed Cables and Messengers states:

“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).”

| Location | Violation Description |
|----------|---|
| 66 | Dead-end fiber line with messenger missing ground wire. |

10. GO 95, Rule 94.4, Antennas, Clearances states in part:

“A. Antennas and support elements below supply lines shall maintain a vertical clearance of 6 feet from Supply Conductors operating at 0 – 50kV. (See Figure 94-1)

B. Antennas and support elements below communication lines shall maintain a 2 ft. vertical separation from communication conductors and equipment. (See Figure 94-1)

C. Antennas, associated equipment (e.g. terminations, enclosures) and support elements installed above supply lines and/or communication lines of different ownership attached to the same structure shall maintain the vertical clearances specified in Rule 38, Table 2, Case 21, Columns A - H.

D. Antennas, associated equipment (e.g. terminations, enclosures) and support elements, installed above supply lines and/or communication lines of different ownership, shall maintain the radial clearances from unattached supply and

communication lines specified in Rule 38, Table 2, Case 3.”

| Location | Violation Description |
|----------|--|
| 79 | Verizon antenna riser cables less than two feet from AT&T fiber. |

V. Field Observations

ESRB staff observed the following third-party potential safety concerns during the field inspection. Verizon must issue third-party notifications to the respective utilities for these findings.

GO 95, Rule 18, Maintenance Programs and 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...”

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 GO95.

Note: Each pole owner must be able to determine all other pole owners on poles it owns. Each pole owner must be able to determine all authorized entities that attach equipment on its portion of a pole.”

| Location | Violation Description |
|----------|---|
| 1 | SMUD down guy is loose. |
| 3 | Comcast line touching streetlight. |
| 5 | Comcast idle cut lines. |
| 5 | AT&T idle line hanging down pole. |
| 6 | SMUD missing high voltage signage. |
| 6 | SMUD dead-end insulators are corroded and appear flashed over. |
| 7 | Comcast line has vegetation strain/abrasion. |
| 7 | AT&T line has vegetation strain/abrasion. |
| 7 | Two low AT&T service drops. |
| 7 | Comcast service drop pushed down by vegetation. |
| 8 | Comcast slack long cable span. |
| 8 | AT&T has two slack long conductor spans. |
| 9 | AT&T ground rod exposed. |
| 15 | Exposed SMUD ground wire due to pole fire. |
| 15 | Tree growing into AT&T lines and SMUD secondary conductors. |
| 16 | AT&T pole is unstable, swaying with the wind, and tied to tree with rope. |
| 19 | AT&T line has vegetation strain/abrasion. |
| 19 | Comcast line has vegetation strain/abrasion. |
| 19 | Consolidated line has vegetation strain/abrasion. |
| 21 | Comcast and AT&T rats nest of intertwined service drops. |
| 22 | Comcast drops touching AT&T line. |
| 23 | AT&T open terminal #1417. |
| 24 | Pole step low under 8 feet. |
| 24 | SMUD ground wire exposed. |
| 31 | Frontier line has vegetation strain. |
| 32 | Frontier dead-end pole missing ground wire. |
| 32 | Tree growing into Frontier pole. |
| 33 | SMUD 115 kV transmission line low clearance to top of Frontier pole and Verizon fiber. SMUD transmission pole across the street is missing a down guy causing the pole to lean and reduce the 115 kV line clearance to the Frontier pole and Verizon fiber. |
| 34 | Frontier high vis strip loose. |
| 34 | Frontier line has vegetation strain/abrasion. |
| 38 | Wave riser cover loose and riser exposed. |
| 39 | Idle AT&T line hanging down pole. |

| | |
|----|---|
| 41 | Comcast line extender touching Verizon fiber. |
| 42 | Wave line has vegetation strain/abrasion. |
| 42 | Comcast line has vegetation strain/abrasion. |
| 43 | Consolidated line has vegetation strain/abrasion. |
| 43 | Consolidated fiber line attached to Verizon fiber. |
| 44 | Consolidated middle span guy slacked. |
| 44 | Consolidated line has vegetation strain/abrasion. |
| 44 | Wave line has vegetation strain/abrasion. |
| 46 | SMUD transmission down guy contacting vegetation. |
| 47 | Comcast riser cable not covered. |
| 47 | AT&T line has vegetation strain/abrasion. |
| 47 | Comcast line has vegetation strain/abrasion. |
| 48 | AT&T overhead span guy slacked. |
| 48 | Comcast overhead span guy slacked. |
| 49 | SMUD underground work left metal plate over sidewalk causing trip hazard. |
| 50 | SMUD down guy broken. |
| 50 | Comcast overhead span guy slacked. |
| 50 | AT&T line has vegetation strain/abrasion. |
| 50 | SMUD 2025 intrusive inspection failed indicated by two red tags. |
| 52 | AT&T loose riser cover. |
| 52 | AT&T line contacting down guy. |
| 52 | Zayo line contacting span guy. |
| 53 | AT&T risers not covered at base of pole. |
| 53 | SMUD secondary risers not properly secured to pole. |
| 53 | Loose AT&T down guy and anchor. |
| 54 | SMUD missing high voltage signage. |
| 55 | Communication line less than 4 feet from secondary SMUD line. |
| 56 | Comcast broken lashing wire. |
| 57 | SMUD ground wire exposed. |
| 57 | Comcast line has vegetation strain. |
| 58 | SMUD meter box has exposed ground wire. |
| 58 | Comcast down guy slack. |
| 58 | Comcast down guy marker broken. |
| 58 | Comcast line and two fiber lines contacting streetlight. |
| 59 | AT&T riser cable not covered. |

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| 59 | SMUD pole has double red tags due to a failed intrusive test. |
| 60 | AT&T down guy loose. |
| 60 | SMUD missing high voltage signs. |
| 60 | SMUD ground wire exposed. |
| 60 | SMUD riser brace broken and damaged at bottom of pole. |
| 62 | SMUD exposed ground wire. |
| 65 | Comcast riser not covered at bottom of pole and riser cover loose. |
| 67 | SMUD ground molding damaged and ground wire exposed. |
| 67 | SMUD primary crossarm damaged/decayed. |
| 68 | AT&T cross connect box supported by husky straps (appears to be a temporary fix). |
| 68 | SMUD span guy pushed down by tree. |
| 68 | AT&T low service drop over driveway and along road approximately 9 feet high. |
| 69 | AT&T idle drop. |
| 69 | SMUD lateral and vertical hardware for fuses are not attached to the pole. |
| 70 | AT&T down guy broken. |
| 70 | AT&T down guy marker missing. |
| 72 | Consolidated riser exposed and riser cover damaged. |
| 73 | Comcast riser not covered. |
| 73 | Comcast line touching streetlight. |
| 74 | SMUD missing high voltage signage. |
| 74 | AT&T missing guy marker. |
| 74 | Comcast ground wire cut and damaged. |
| 74 | AT&T line has vegetation strain/abrasion. |
| 76 | AT&T missing guy marker. |
| 76 | AT&T idle drop touching down guy. |
| 79 | AT&T cut ground wire. |
| 79 | AT&T ground rod exposed and touching pole. |
| 79 | AT&T idle lines wrapped around pole. |
| 79 | SMUD missing high voltage sign on bottom crossarm. |
| 82 | Comcast risers not covered. |
| 84 | SMUD cut ground wire. |
| 84 | Consolidated buddy pole. |
| 84 | SMUD 60 kV insulators leaning. |
| 84 | SMUD damaged/deteriorated pole. |

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| 85 | Comcast ground wire cut at bottom of pole. |
| 85 | SMUD disconnect box fitting is loose. |
| 85 | SMUD idle crossarm touching secondary insulator. |
| 86 | SMUD ground wire exposed. |
| 89 | AT&T slack down guy. |
| 89 | SMUD service drop contacting streetlight. |
| 90 | SMUD missing high voltage sign. |
| 90 | SMUD crossarm splitting at insulator through bolt. |
| 90 | AT&T line contacting Comcast line. |