PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 9, 2026

CA2025-1415

Mike Stanley
Manager, Technical Operations
Astound, 200 Paul Avenue Suite 301
San Francisco, CA 94124

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Astound Contra Costa County

Mr. Stanley:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Matthew Yunge and Gordon Szeto of ESRB staff conducted a communication audit of Astound Contra Costa from October 6, 2025 through October 9, 2025. During the audit, ESRB staff conducted field inspections of Astound's communication facilities and equipment 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 February 9, 2026 by electronic copy of all corrective actions and preventive measures taken by Astound 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 Matthew Yunge at (415) 603-9828 or matthew.yunge@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Communication Audit Report for Astound Contra Costa County

Cc:

Lee Palmer, Deputy Executive Director, Safety and Enforcement Division (SED),
Safety Policy Division, Water Division, CPUC
Chihsien "Eric" Wu, Program Manager, ESRB, Safety and Enforcement Division (SED), CPUC
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Matthew Yunge, Senior Utilities Engineer, ESRB, SED, CPUC
Gordon Szeto, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC

ASTOUND CONTRA COSTA COUNTY
COMMUNICATIONS AUDIT FINDINGS
October 6 – October 9, 2025

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Astound's Contra Costa County region:

- Fiber Design & Construction (FDC)-CM10 General Order (GO) Plant Inspections
- SCTE - GO 95 Presentations for Technicians
- An Excel Workbook which included tabs for Contra Costa Plant Inspections and Pole Relocations.
- GO 95 and 128 Infraction Submittal Form
- List of Construction Projects completed from April 1, 2024 to April 1, 2025
- An example of an Intrusive Test Report
- An example of a pole load sheet
- Map of Astound facilities
- GO 95 Job Custom & Repair Process procedure

II. Records Violations

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

1. **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."*

Astound provided no procedures to ensure underground assets are inspected thoroughly and completely as required by GO 128.

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.

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's review of Astound's work orders from April 2020 to April 2025 found that a total of 94 work orders were either completed late or are late and still open. Astound's priority levels (called "Repair Priority") for work orders do not align with the levels defined in GO 95, Rule 18-B. The correction timelines associated with each priority level are as follows:

- Priority 1: 30 days
- Priority 2: 60 days
- Priority 3: 90 days
- Priority 4: 120 days

In response to a CPUC data request, Astound stated that in cases where there is an imminent safety concern, the relevant Repair Priority would be Priority 1, which has a correction date of 30 days. However, it is unclear if there is any additional factor that would indicate whether an Astound Priority 1 work order is of the same nature as a CPUC Priority Level 1 work order. For example, if there is an imminent safety risk, creating a Priority 1 work order and allowing up to 30 days to repair is not adequate and does not meet the Rule 18 requirement to immediately repair or temporary repair and reclassify. Regarding situations that would align with level 2 and level 3 as listed in GO 95, Astound's Repair Priority levels are within the timeframe required by GO 95.

For the purposes of determining if a work order is late, ESRB used the correction timelines listed above. If a work order was resolved after the due date established by the work order's Repair Priority, or if it was still open as of September 5, 2025 and the due date was earlier than September 5 2025, then it was also considered late.

Table 1 breaks down the late work orders for the Contra Costa County

Table 1. Contra Costa County Late Closed Work Orders[1,2,3]

Hazard Level	Complete	Pending	Total
1	9	4	13
2	4	2	6
3	31	27	58
Null	9	8	17
Total	**53**	**41**	**94**

Table 2 lists the latest closed and most past due pending work orders.

Table 2. Contra Costa County Most Past Due Work Orders

Package ID	Hazard Level	Create Date[4]	Due Date	Closed Date	Days Late[5]	Status
6801472	1	2021-06-10	2021-07-10	2024-08-21	1,138	CLOSED
6966395	2	2022-01-20	2022-03-21	NA	1,264	OPEN

[1] A Hazard Level of "Null" indicates that no priority level was assigned to the work order. For this table, "Null" is given the same due date as Priority 1.
[2] This table only includes work orders in which Astound is the entity that was designated as the "Entity of Violation".
[3] Due dates of work orders are calculated by adding Astound's timeframe to the date the work order was created.
[4] Dates are all given in the form YYYY-MM-DD.
[5] For open work orders, the number of days late is counted from the calculated due date to September 5, 2025.

6801607	3	2021-06-10	2021-09-08	2024-12-17	1,196	CLOSED
6240127	NA	2020-05-22	2020-09-19	NA	1,902	OPEN

Additionally, there were multiple instances in the field in which work orders that Astound had indicated as "resolved" were still unresolved when visited by ESRB. In response to a CPUC data request, Astound mentioned that it conducts quality control ("QC") on 10% of work orders conducted by contractors. If a project fails the QC process check, then the contractor is notified to complete the correction and that project is checked again. If a QC project fails, an additional 10% of work orders is checked. There is no documentation process to verify how the QC process is conducted. There is no process to verify that a project was completed correctly if it is not being checked. These shortcomings amount to a violation of GO 95, Rule 18-B violation for failing to adequately implement its overhead maintenance program. Astound stated that moving forward it will implement the following changes:

- Contractors and in-house staff will be required to send a picture of completed work.
- The Astound coordinator that is assigned to a project must visit the work site prior to assigning the work to a contractor.

III. Field Inspection

During the field audit, ESRB inspected the following facilities:

Table 3. Locations Inspected

Location #	Structure Type	GPS Coordinates (Longitude, Latitude
1	Wood Pole	-121.96688665, 37.95999413
2	Wood Pole	-121.96673928, 37.96017173
3	Wood Pole	-121.96679794, 37.96024724
4	Wood Pole	-121.95624513, 37.95995885
5	Wood Pole	-121.95554178, 37.95963055
6	Wood Pole	-121.95665764, 37.96009193
7	Wood Pole	-121.95652598, 37.96050818
8	Communication Vault	-121.95698535, 37.96027958
9	Communication Vault	-121.95704204, 37.96041783
10	Wood Pole	-121.95171413, 37.94462057
11	Wood Pole	-121.95129131, 37.94399905
12	Wood Pole	-121.95137311, 37.94379236
13	Wood Pole	-121.96787162, 37.94807967
14	Wood Pole	-121.96800884, 37.94833375
15	Wood Pole	-121.96823182, 37.9478433
16	Communication Vault	-121.98312642, 37.9514429
17	Communication Vault	-121.98320612, 37.95108682
18	Communication Vault	-121.98338872, 37.95102411
19	Communication Vault	-121.98332981, 37.95140744
20	Communication Vault	-121.98330476, 37.95169574
21	Communication Vault	-121.98316309, 37.95192241
22	Wood Pole	-122.02508979, 38.00616341
23	Wood Pole	-122.02546861, 38.0063188
24	Wood Pole	-122.02597013, 38.00641994
25	Wood Pole	-122.02635425, 38.00662301
26	Wood Pole	-122.01971687, 37.98334014
27	Wood Pole	-122.02005308, 37.98372846
28	Wood Pole	-122.02030527, 37.98385827
29	Wood Pole	-122.00931739, 37.9884937

Location #	Structure Type	GPS Coordinates (Longitude, Latitude
30	Wood Pole	-122.00930674, 37.98890437
31	Wood Pole	-122.00925605, 37.98927169
32	Wood Pole	-122.00922049, 37.98965089
33	Wood Pole	-122.01890712, 37.96631041
34	Wood Pole	-122.01876347, 37.96666354
35	Wood Pole	-122.01853458, 37.96716732
36	Wood Pole	-122.01911536, 37.96579514
37	Wood Pole	-122.01922314, 37.96559535
38	Wood Pole	-122.04445162, 37.97359115
39	Wood Pole	-122.04425332, 37.9739563
40	Wood Pole	-122.04409263, 37.97432277
41	Wood Pole	-122.04387208, 37.97471704
42	Wood Pole	-122.04771059, 37.9605443
43	Wood Pole	-122.04734953, 37.96086563
44	Wood Pole	-122.04712295, 37.9611513
45	Wood Pole	-122.04664811, 37.96131605
46	Wood Pole	-122.02543556, 37.94807692
47	Wood Pole	-122.025654, 37.94794921
48	Wood Pole	-122.02579148, 37.94722785
49	Wood Pole	-122.02613733, 37.94679174
50	Wood Pole	-122.00623411, 37.93164258
51	Wood Pole	-122.00570643, 37.93183856
52	Wood Pole	-122.00524535, 37.9319273
53	Wood Pole	-122.04725403, 37.92456847
54	Communication Vault	-122.04819077, 37.92428299
55	Communication Vault	-122.04834242, 37.92424167
56	Communication Vault	-122.04867408, 37.92392719
57	Communication Vault	-122.04863591, 37.92395469
58	Communication Vault	-122.04816756, 37.9242787
59	Wood Pole	-122.02289427, 37.91219994
60	Wood Pole	-122.0227912, 37.91255414
61	Wood Pole	-122.02284985, 37.9130842
62	Wood Pole	-122.02279486, 37.91354907
63	Wood Pole	-122.03811694, 37.9149423

Location #	Structure Type	GPS Coordinates (Longitude, Latitude
64	Wood Pole	-122.03857569, 37.9147903
65	Wood Pole	-122.03905919, 37.91462415
66	Wood Pole	-122.05045212, 37.90269855
67	Wood Pole	-122.05092054, 37.90252365
68	Wood Pole	-122.05133617, 37.90241455
69	Wood Pole	-122.03476656, 37.88404976
70	Wood Pole	-122.03499463, 37.8845076
71	Wood Pole	-122.0352436, 37.88492466
72	Wood Pole	-122.06511655, 37.87789303
73	Wood Pole	-122.06509867, 37.87825263
74	Wood Pole	-122.06516907, 37.87766564
75	Wood Pole	-122.06526117, 37.87798218
76	Wood Pole	-122.06275678, 37.88823026
77	Wood Pole	-122.06285775, 37.88775072
78	Wood Pole	-122.06249133, 37.88818906
79	Wood Pole	-122.06181177, 37.88819339
80	Wood Pole	-122.0661368, 37.89971283
81	Wood Pole	-122.06649082, 37.89962457
82	Wood Pole	-122.07777708, 37.91949979
83	Wood Pole	-122.07740013, 37.91953247
84	Communication Vault	-122.07708745, 37.91945058
85	Communication Pedestal	-122.07713628, 37.91920761
86	Communication Vault	-122.07710132, 37.91852662
87	Communication Vault	-122.07647025, 37.9186854
88	Communication Vault	-122.07676605, 37.9187174
89	Wood Pole	-122.0849293, 37.93759045
90	Wood Pole	-122.08473198, 37.93796025
91	Wood Pole	-122.08468061, 37.93839087
92	Wood Pole	-122.08477506, 37.93888885
93	Wood Pole	-122.08481532, 37.93976782
94	Wood Pole	-122.08906508, 37.94305521
95	Wood Pole	-122.08936783, 37.94329289
96	Wood Pole	-122.0894071, 37.94363083
97	Wood Pole	-122.08939872, 37.94384095

Location #	Structure Type	GPS Coordinates (Longitude, Latitude
98	Wood Pole	-122.0710336, 37.93544907
99	Wood Pole	-122.07125788, 37.93547906
100	Wood Pole	-122.071649, 37.93566005
101	Wood Pole	-122.0704995, 37.935281
102	Wood Pole	-122.06851096, 37.94591152
103	Wood Pole	-122.06878024, 37.94572975
104	Wood Pole	-122.06935719, 37.94573278
105	Wood Pole	-122.0947018, 37.98996537
106	Wood Pole	-122.09480573, 37.98922131
107	Wood Pole	-122.09471371, 37.98912023
108	Wood Pole	-122.094699, 37.9885924
109	Wood Pole	-122.11566122, 38.00756094
110	Wood Pole	-122.11573894, 38.00726723
111	Wood Pole	-122.11588919, 38.00721515
112	Wood Pole	-122.11651724, 38.00712518
113	Wood Pole	-122.12523044, 38.00438689
114	Wood Pole	-122.12441391, 38.00458747
115	Wood Pole	-122.12540983, 38.00518535
116	Wood Pole	-122.12561, 38.00544917
117	Wood Pole	-122.13310804, 37.99498073
118	Wood Pole	-122.13296878, 37.99464122
119	Wood Pole	-122.13287362, 37.99391481
120	Wood Pole	-122.12797918, 37.99299571
121	Wood Pole	-122.12842886, 37.99279196

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 4:

Table 4: GO 95, Rule 31.1 Findings

Location	Findings
1	Loose lashing on span.
7	Ground wire not attached to pole.
31	Astound drop attached to power supply weather head.
63	Pole transfer not completed.
70	Buried down guy anchor.
95	Resolved ticket says astound transferred but that is wrong.
95	Pole transfer not completed.
98	Pole transfer not completed.
105	Pole transfer not completed.
109	Existing tag says work was done, but work was not completed.
112	Loose splice case at midspan.
121	Pole transfer not completed.

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 findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 31.6 Findings

Location	Findings
64	Abandoned service drop.
109	Abandoned service drop.

3. **GO 95, Rule 37, Minimum Clearance of Wires above Railroads, Thoroughfares, Buildings, Etc.** states in part:

> *"Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.*
> *The clearances specified in Table 1, Case 1, Columns A, B, D, E and F, shall in no case be reduced more than 5% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions. The clearances specified in Table 1, Cases 2 to 6 inclusive, shall in no case be reduced more than 10% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions. The clearance specified in Table 1, Case 1, Column C (22.5 feet), shall in no case be reduced below the tabular value because of temperature and loading as specified in Rule 43. The clearances specified in Table 1, Cases 11, 12 and 13, shall in no case be reduced below the tabular values because of temperatures and loading as specified in Rule 43. Where supply conductors are supported by suspension insulators at crossings over railroads which transport freight cars, the initial clearances shall be sufficient to prevent reduction to clearances less than 95% of the clearances specified in Table 1, Case 1, through the breaking of a conductor in either of the adjoining spans. Where conductors, dead ends, and metal pins are concerned in any clearance specified in these rules, all clearances of less than 5 inches shall be applicable from surface of conductors (not including tie wires), dead ends, and metal pins, except clearances between surface of crossarm and conductors supported on pins and insulators (referred to in Table 1, Case 9) in which case the minimum clearance specified shall apply between center line of conductor and surface of crossarm or other line structure on which the conductor is supported. All clearances of 5 inches or more shall be applicable from the center lines of conductors concerned. When measuring the minimum allowable vertical conductor clearances in a span, the minimum clearance applies to the specific location under the span being measured and not for the entire span"*

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

Table 6: GO 95, Rule 37 Findings

Location	Findings
47	Low ground clearance.
100	Low ground clearance for service drops.

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.

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 7:

Table 7: GO 95, Rule 38 Findings

Location	Findings
2	Astound and Comcast lines contacting.
3	Comcast and Astound lines are in close proximity. Less than 3 inches.

Location	Findings
6	Comcast and Astound lines are contacting.
13	Astound line contacting phone line.
14	Comcast and Astound lines are contacting.
15	Astound and Comcast lines have low wire-to-wire clearance.
28	Astound service contacting AT&T line.
31	Astound drop contacting Comcast drop.
33	Astound service contacting AT&T service.
43	Astound service drop contacting other services.
43	Astound drop contacting Comcast drop.
46	Astound and AT&T service drops contacting.
61	Astound service drop contacting AT&T service drop.
95	Astound service drops contact with PG&E overhead guy.
98	Astound service drop contacting Comcast service drop.
99	Astound service drop clipped to Comcast line.
100	Astound line contacting Comcast line.
105	Astound line contacting Comcast line.
108	Astound service drop contacting AT&T service drop.
117	Astound loop is contacting Comcast line
120	Astound and Comcast lines contacting.

5. **GO 95, Rule 44.3, Replacement** states in part:

"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."

ESRB's findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 44.3 Findings

Location	Findings
4	Loose lashing.
4	Astound service drop sagging into Comcast level. Also contacting AT&T service drop.
50	Broken lashing wire.

6. **GO 95, Rule 84.6-B, Ground Wires** states in part:

"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 the above rule are listed in Table 9:

Table 9: GO 95, Rule 84.6-B Findings

Location	Findings
40	Exposed ground wire.
42	Exposed ground wire.
71	Exposed ground wire
72	Exposed ground wire
113	Exposed ground wire.

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 10:

Table 10: GO 95, Rule 86.2 Findings

Location	Findings
66	Astound and AT&T down guys are slack.
75	Slack down guy.
101	Slack down guy.

8. **GO 95, Rule 86.7.B, Anchor Guys** states in part:

"An insulator shall be installed in each anchor guy which is required to be sectionalized by Rule 86.6–B2, so that such insulator is located not less than 8 feet above the ground and either 8 feet below the level of the lowest supply conductor or not less than 6 feet from surface of pole and not less than one foot below the level of the lowest supply conductor. These sectionalizing requirements for anchor guys can normally be met by insulation at one location; however, short guys or other conditions may require insulation at two locations, one location being not less than 8 feet above the ground and the other location either not less than 8 feet below the lowest supply conductors, or not less than 6 feet horizontally from pole and not less than one foot below the level of the lowest supply conductor. 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.

Anchor guys which pass through the level of supply conductors at positions other than between pole pin positions or outside of the outer pin positions, shall be

sectionalized by means of an insulator placed below the supply conductors in accordance with the foregoing provisions of this rule, and in addition thereto an insulator shall be placed not less than 2 feet above the supply conductor level.

An insulator or insulators shall be located in "sidewalk" guys so that no grounded horizontal brace is less than 8 feet below the lowest supply conductor."

ESRB's findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 86.7.B Findings

Location	Findings
48	Vegetation touching down guy above insulator.
94	Vegetation touching down guy above insulator.

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 12:

Table 12: GO 95, Rule 86.9 Findings

Location	Findings
65	Down guy missing marker.

10. **GO 95, Rule 92.1.F.5, Street Lighting Equipment** states:

"All parts of street light drop wires, street lamps, and their supporting fixtures (including rods, braces and guys) shall be not less than 1 foot above or 2 feet below the level of messengers or conductors supported by messengers."

ESRB's findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 92.1.F.5 Findings

Location	Findings
89	Low clearance from light fixture.

11. GO 95, Rule 92.4.C.2, Ground Rods (Ground Electrodes) states in part:

"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."

ESRB's findings related to the above rule are listed in Table 14:

Table 14: GO 95, Rule 92.4.C.2 Findings

Location	Findings
7	Exposed ground rod and wire at base of pole.

12. GO 95, Rule 93, Climbing Space states in part:

"*Climbing space shall be provided on all jointly used poles in accordance with the provisions of Rules 54.7, 54.9, 54.10, 54.11, 54.12, and 84.7.*
Climbing space on jointly used poles shall be maintained so that its position in relation to the pole is not changed by more than 90 degrees in a vertical distance of less than 8 feet.
Climbing space shall be maintained from the ground level."

ESRB's findings related to the above rule are listed in Table 15:

Table 15: GO 95, Rule 93 Findings

Location	Findings
6	Tree is obstructing climbing space.

13. **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 findings related to the above rule are listed in Table 16:

Table 16: GO 128, Rule 17.1 Findings

Location	Findings
17	Broken lid.
19	Loose ground wire.
87	Broken lid
87	No ground at end of line.

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

> "*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 17:

Table 17: GO 128, Rule 17.8 Findings

Location	Findings
18	No ownership identifier.
19	No ownership identifier.

Location	Findings
20	No ownership identifier.

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 noted the third-party safety concerns listed in Table 18.

Table 18: Third-Party Observations

Location	Third-Party	Observations
1	AT&T	AT&T line contacting Astound line.
1	AT&T	Abandoned AT&T line.
1	Comcast	Abandoned Comcast service drop.

Location	Third-Party	Observations
2	Pacific Gas and Electric	PG&E service drop is low at road edge at midspan. It is also contacting the Astound line.
3	AT&T	AT&T Service line contacting multiple down guys.
3	AT&T	Vegetation above AT&T down guy insulator.
4	Pacific Gas and Electric	PG&E service contacting comms lines.
5	Comcast	Comcast service line on AT&T line.
5	Unknown	No ground wire at dead end pole.
7	AT&T	Open AT&T splice case.
10	Comcast	Comcast contacting AT&T lines.
11	AT&T	Loose AT&T wire on pole.
11	Comcast	AT&T and Comcast lines contacting.
13	Comcast	Comcast contacting AT&T line.
13	Comcast	Comcast line on AT&T splice case.
14	AT&T	AT&T contacting Comcast and Astound line.
22	Comcast	Comcast drop on AT&T drop.
22	AT&T	Comcast and AT&T service drops are low.
23	Unknown	Exposed and detached ground wire.
24	Comcast	Comcast service contacting Astound and AT&T service drops
25	AT&T	AT&T service drop low ground clearance.
25	Comcast	Exposed ground and broken cover.
25	Comcast	Comcast contact with AT&T line midspan.
26	AT&T	Abandoned AT&T phone line.
26	Comcast	AT&T and Comcast service drops contacting.
27	Comcast	Comcast service drop contacting AT&T service drop.
28	Comcast	Comcast service drop contacting AT&T service drop.
27	Pacific Gas and Electric	Low clearance service drop in front of 1943 North 6th Street.

Location	Third-Party	Observations
29	Sonic	Sonic contacting Astound line.
30	AT&T	Abandoned AT&T drop.
32	AT&T	AT&T service drop contacting Comcast service drop.
32	AT&T	AT&T on power weatherhead
33	Pacific Gas and Electric	Exposed PG&E ground wire.
33	AT&T	AT&T line has low ground clearance.
34	Sonic	Exposed Sonic ground wire.
36	AT&T	AT&T low ground clearance service drop.
40	AT&T	Uncovered AT&T riser.
42	AT&T	Abandoned AT&T service drop.
42	AT&T	AT&T service drop contacting Comcast service drop.
44	Comcast	Ground moulding missing at the bottom 8 feet of pole.
46	AT&T	AT&T service drop contacting Astound down guy.
47	Comcast	Comcast and AT&T both have low ground clearance.
48	Pacific Gas and Electric	Vegetation contacting PG&E down guy above insulator.
48	Comcast	Vegetation contacting Comcast down guy above insulator.
48	AT&T	Exposed AT&T ground wire.
49	Comcast	Comcast service contacting AT&T services.
52	AT&T	Exposed AT&T riser
53	AT&T	AT&T pole transfer not completed.
53	AT&T	AT&T riser is loose.
59	Comcast	Comcast pole transfer not completed.
59	AT&T	AT&T service on old pole wrapping on new pole.
62	Comcast	Comcast pole transfer not completed.

Location	Third-Party	Observations
62	Comcast	At two points Comcast service drop touches AT&T service drops.
62	Comcast	Comcast low ground clearance service drop.
63	AT&T	Low AT&T pole step on old pole.
63	AT&T	AT&T stored loop on tree.
63	AT&T	AT&T service drop contacting Comcast service drop.
63	AT&T	Loose AT&T wire hanging on Astound and Comcast.
64	Pacific Gas and Electric	Broken pole top.
65	AT&T	AT&T low ground clearance for service drop.
65	Pacific Gas and Electric	PG&E down guy missing marker.
65	AT&T	AT&T service drops low wire-to-wire clearance.
66	Pacific Gas and Electric	Vegetation contacting PG&E down guy above insulator.
67	Pacific Gas and Electric	Low pole step.
68	Pacific Gas and Electric	Vegetation contacting PG&E down guy above insulator.
68	AT&T	AT&T service drop contacting down guy.
69	Sonic	Cracked Sonic molding. Exposed ground wire.
69	Sonic	Sonic pole transfer not completed.
71	AT&T	AT&T service drop contacting down guys.
72	Comcast	Exposed Comcast ground wire.
74	Pacific Gas and Electric	Climbing space obstruction.
75	Comcast	Slack Comcast down guy.
76	Comcast	Comcast pole transfer not completed.
79	Pacific Gas and Electric	Deteriorating PG&E cross arm.
81	Pacific Gas and Electric	PG&E cross arm has hole in it.
82	Sonic	Sonic line contacting down guy.
82	AT&T	AT&T pole transfer not completed.

Location	Third-Party	Observations
82	AT&T	AT&T down guy on old pole missing marker.
90	Pacific Gas and Electric	Low pole step.
91	AT&T	Exposed AT&T ground wire.
92	Pacific Gas and Electric	Climbing space obstruction.
92	Pacific Gas and Electric	Vegetation contacting PG&E down guy above insulator.
94	Pacific Gas and Electric	Vegetation contacting PG&E down guy above insulator.
94	Comcast	Vegetation contacting PG&E down guy above insulator.
94	Pacific Gas and Electric	Two large holes at top of pole.
95	Comcast	Comcast service drop contacting AT&T line.
95	AT&T	AT&T line contacting overhead guy.
96	AT&T	AT&T service drop contacting Comcast drop.
98	Comcast	Comcast pole transfer not completed.
98	Comcast	No Comcast riser cover.
98	AT&T	Abandoned AT&T drop.
98	Comcast	Low Comcast service drop.
99	AT&T	Exposed AT&T riser.
100	Pacific Gas and Electric	Low PG&E service drops.
100	Comcast	Low PG&E service drops.
101	Pacific Gas and Electric	Slack PG&E down guy.
101	Comcast	Slack PG&E down guy.
105	Comcast	Comcast pole transfer not completed.
106	AT&T	Low AT&T service drop.
106	Comcast	Comcast line strained by tree.
106	AT&T	AT&T service drop strained by tree.
109	AT&T	Abandoned AT&T drop.

Location	Third-Party	Observations
110	AT&T	AT&T drop holding up palm fronds.
112	Pacific Gas and Electric	Sheathe deteriorating on PG&E primary lines.
114	Pacific Gas and Electric	Deteriorated high voltage sign.
115	Pacific Gas and Electric	Low PG&E service drop.
119	AT&T	Open AT&T splice case.
120	Comcast	Comcast pole transfer not completed.
120	AT&T	Exposed AT&T riser.
120	Comcast	Comcast line on AT&T service drop.
121	Pacific Gas and Electric	Vegetation contacting down guys above PG&E insulators.
121	Comcast	Comcast pole transfer not completed.