



1401 Wynkoop Street
Denver, CO 80202
USA

www.zayo.com
@ZayoGroup

September 21, 2026

VIA ELECTRONIC MAIL

Majed Ibrahim, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

**Re: CA2026-1407 - Audit of Crown Castle San Diego County South
Zayo Response to Field Inspection Findings**

Dear Mr. Ibrahim:

Zayo Group, LLC ("Zayo") submits this response to the field inspection findings in the California Public Utilities Commission's ("Commission") August 20, 2026 audit report, CA2026-1407, concerning Crown Castle San Diego County South and the audit conducted June 15-19, 2026.

The Crown Castle entity identified in the audit subsequently became Arium Networks ("Arium"). After Crown Castle sold the subject network assets to Zayo, Zayo became the operator and effective owner of those assets. Zayo, not Arium, now operates the audited network. Zayo therefore is responding to the field inspection findings and the corrective actions associated with the subject facilities.

Arium is separately responding to the records-review portion of this audit. As the successor to the Crown Castle entity that was responsible for the historical records during the period reviewed, Arium will address the records request and related records-review findings in a separate letter. Going forward, for periods following Zayo's acquisition and operation of the subject network assets, Zayo will be responsible for maintaining the applicable records and for responding to the Commission's records requests and related audit inquiries concerning those assets. Consistent with that allocation of responsibility, this letter and Exhibit A are limited to the field inspection portion of this audit and do not address the historical records request.

Zayo has completed the corrective actions within its control for all six field conditions. As detailed in Exhibit A, Zayo issued the applicable third-party notifications to Cox Communications, addressed the third-party service-drop condition, corrected the grounding condition at Pole P198526S, and installed the missing risers at Poles P737971 and P930287. Zayo is also using these findings to reinforce with its regional operations personnel the requirements for prompt third-party notification and for verification of grounding and riser protection during field work.

Zayo appreciates the opportunity to respond to the Commission's field inspection findings. Please contact me at Alfredo.Arzubiaga@zayo.com or 818-939-5579 with any questions regarding Zayo's response.

Sincerely,

Alfredo Arzubiaga
Head of Regional Operations - West
Zayo Group, LLC

Enclosure: Exhibit A - Zayo's Responses to the Audit Report's Field Inspection Findings

cc: Koko Tomassian, Director, Safety and Enforcement Division, CPUC; Eric Wu, Program Manager, Electric Safety and Reliability Branch, SED, CPUC; Kyle King, Utilities Engineer, Electric Safety and Reliability Branch, SED, CPUC

**ZAYO'S RESPONSES TO THE
AUDIT REPORT'S FIELD INSPECTION FINDINGS**

Location #	Structure ID	Location	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
17	Z730051	San Diego	Pole	GO 95, Rule 18-A3: Zayo did not notify the third-party responsible regarding Cox communications attached to Zayo communication conductor.	<u>9/3/26</u>	Zayo resolved the issue by sending 3 rd Party Notification to Cox Communications.
18	Z2057273106	San Diego	Pole	GO 95, Rule 18-A3: Zayo did not notify the third-party responsible regarding Cox communications attached to Zayo communication conductor.	<u>9/3/26</u>	Zayo resolved the issue by sending 3 rd Party Notification to Cox Communications.
23	P252753	San Diego	Pole	GO 95, Rule 38, Table 2, Case 8, Column C: Cox communications service drop and Zayo communications conductor were touching.	<u>9/14/26</u>	Zayo resolved the issue by sending 3 rd Party Notification to Cox Communications. Zayo determined that Cox needs to remove their drop.
30	P198526S	San Diego	Pole	GO 95, Rule 54.6-B: Ground molding supported on the pole was damaged.	<u>8/28/26</u>	Zayo resolved the issue by bonding the ground wire to the ground rod.
31	P737971	San Diego	Pole	GO 95, Rule 87.7-D1: Pole did not have a riser.	<u>8/28/26</u>	Zayo resolved the issue by installation of riser.
42	P930287	San Diego	Pole	GO 95, Rule 87.7-D1: Pole did not have a riser.	<u>9/16/26</u>	Zayo resolved the issue by installation of riser.