



September 21, 2026

Via Electronic Mail

Rickey Tse, P.E.
Program and Project Supervisor – Electric Safety and Reliability Branch
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California Public Utilities Commission
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RE: Response to CPUC East Bay CIP Audit Report - East Bay Region
Audit No. CA2026-1437

Dear Mr. Solorio:

Zayo Group, LLC ("Zayo") submits this response to the California Public Utilities Commission Safety and Enforcement Division, Electric Safety and Reliability Branch, in connection with the Communications Infrastructure Provider audit of Zayo's East Bay region, Audit No. CA2026-1437.

Zayo appreciates the opportunity to respond to the August 21, 2026 audit report. Zayo takes the findings seriously and has completed or initiated the corrective actions described in the enclosed detailed response. Zayo has also identified preventive measures intended to address the records and process findings and prevent recurrence.

The enclosed response is organized to correspond to Sections I through V of the audit report. For the field inspection violations and observations, the response identifies each location by the location number used in the report and states the corrective action, work status, or third-party notification reflected in Zayo's corrective-action records. Zayo will continue to track open items to completion and maintain the associated records. Thank you for your time and assistance with this audit response. Of course, if you have any questions or need additional information, please feel free to contact either by email at ricky.martin.jr@zayo.com or by phone at 408-350-6603.

Sincerely,

David Urbach
Director of Underlying Rights and Government Relations
Zayo Group, LLC

Enclosure: Zayo's Detailed Response to Audit Report CA2026-1437

ZAYO'S RESPONSES TO THE AUDIT REPORT
CIP AUDIT CA2026-1437 - ZAYO EAST BAY REGION
JULY 6-10, 2026

I. Records Review

Zayo acknowledges ESRB's description of the records reviewed. Section I identifies no separate violation or corrective action requiring a substantive response.

II. Records Violations

1. GO 95, Rule 18-B - Maintenance Programs

Response: Moving forward, Zayo will require each trouble ticket involving a potential GO 95 violation or safety hazard to be assigned the appropriate priority level at the time of identification by a qualified company representative. The priority will be based on the nature of the condition and its potential impact on safety or reliability, documented in Zayo's auditable maintenance records, and used to establish and track the applicable corrective-action deadline under Rule 18-B.

2. GO 95, Rule 80.1-A(1) - Inspection Requirements for Joint-Use Poles in High Fire-Threat Districts

Response: Zayo will address the applicable East Bay poles located in Tier 2 and Tier 3 High Fire-Threat Districts by confirming that they are included in Zayo's inspection inventory, performing the applicable inspections, and maintaining the poles on the recurring schedules required by Rule 80.1-A(1). Zayo will conduct patrol and detailed inspections at the required intervals: Tier 2 patrol inspections every two years and detailed inspections every ten years; and Tier 3 patrol inspections annually and detailed inspections every five years.

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

Response: Moving forward, Zayo will record the date of each facility inspection and maintain the complete inspection record required by Rule 80.1-A(4), including the facility location, inspection date, inspection results, personnel who performed the inspection, date and description of each corrective action, and personnel who performed the corrective action. Zayo will retain these records for at least ten years.

III. Field Inspection

Zayo acknowledges the field inspection locations identified in Section III. Zayo's location-specific responses to the resulting violations and observations are provided in Sections IV and V below.

IV. Field Inspection Violations

The table below responds to each field inspection violation by the location number used in the audit report. Status terms reflect the corrective-action information provided by Zayo: "Completed" identifies corrective work reported complete; "Initiated" and "Dispatched" identify actions underway.

Location #	City	Structure Type	Audit Finding	Corrective / Preventive Action
2	Livermore	Hand Hole	GO 128, Rule 17.1: Facility was not found; the facility-location record was incorrect.	Initiated - Zayo initiated an audit for correction of the facility-location record.
3	Livermore	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.
7	Dublin	Pole	GO 95, Rule 31.1: Facility was not found; the facility-location record was incorrect.	Initiated - Zayo initiated an audit for correction of the facility-location record.
8	Dublin	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.

Location #	City	Structure Type	Audit Finding	Corrective / Preventive Action
9	Discovery Bay	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.
10	Discovery Bay	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.
11	Discovery Bay	Pole	GO 95, Rule 84.6-D: Riser cable was unattached to the pole. GO 95, Rule 86.9: Guy wire guard was broken.	Completed - Zayo corrected the riser attachment. Completed - Zayo completed the corrective work to the guy wire guard.
12	Discovery Bay	Pole	GO 95, Rule 35: Vegetation was placing strain on the cable.	Completed - Zayo completed vegetation reduction to relieve the cable strain.
13	Discovery Bay	Pole	GO 95, Rule 35: Vegetation was placing strain on the cable. GO 95, Rule 84.7-A: Vegetation was impeding climbing space.	Completed - Zayo completed vegetation reduction to relieve the cable strain and clear the climbing space.
18	Brentwood	Pole	GO 95, Rule 38: Zayo cable was in contact with a telecommunications facility.	Completed - Zayo corrected the condition to restore appropriate separation.
21	Brentwood	Pole	GO 95, Rule 84.6-D: Riser cable was unattached to the pole.	Completed - Zayo corrected the riser attachment.
22	Brentwood	Vault	GO 128, Rule 17.1: Facility was not found; the facility-location record was incorrect.	Initiated - Zayo initiated an audit for correction of the facility-location record.
23	Brentwood	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.
25	Brentwood	Pole	GO 95, Rule 84.6-B: Ground wire was exposed. GO 95, Rule 84.6-D: Riser cable was unattached to the pole.	Completed - Zayo corrected the ground-wire exposure. Completed - Zayo corrected the riser attachment.
26	Hayward	Pole	GO 95, Rule 31.1: Facility was not found; the facility-location record was incorrect.	Initiated - Zayo initiated an audit for correction of the facility-location record.
28	Hayward	Vault	GO 128, Rule 17.1: Facility was not found; the facility-location record was incorrect.	Initiated - Zayo initiated an audit for correction of the facility-location record.
35	Hayward	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.
36	Hayward	Pole	GO 95, Rules 87.7-D(1)(b) and 22.8-A: Riser cover was less than 8 feet above ground.	Completed - Zayo corrected the riser-cover length.
38	Hayward	Pole	GO 95, Rule 86.2: Guy wire was slack.	Completed - Zayo tightened the guy wire.
39	Hayward	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.
46	Fremont	Pole	GO 95, Rule 84.7-A: Vegetation was impeding climbing space.	Completed - Zayo completed vegetation reduction to clear the climbing space.
49	Fremont	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.
51	Fremont	Pole	GO 95, Rule 84.7-A: Vegetation was impeding climbing space.	Completed - Zayo completed vegetation reduction to clear the climbing space.
64	Oakland	Vault	GO 128, Rule 17.1: Facility was not found; the facility-location record was incorrect.	Initiated - Zayo initiated an audit for correction of the facility-location record.

Location #	City	Structure Type	Audit Finding	Corrective / Preventive Action
65	Oakland	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.
72	Oakland	Pole	GO 95, Rule 31.1: Pole transfer was incomplete.	Dispatched - Zayo dispatched the location for completion of the pole transfer.
73	Berkeley	Pole	GO 95, Rule 31.1: Pole transfer was incomplete.	Dispatched - Zayo dispatched the location for completion of the pole transfer.
75	Berkeley	Pole	GO 95, Rule 84.6-D: Riser cable was unattached to the pole.	Completed - Zayo corrected the riser attachment.
77	Berkeley	Access Hole	GO 128, Rule 17.1: Facility was not found; the facility-location record was incorrect.	Initiated - Zayo initiated an audit for correction of the facility-location record.
81	Berkeley	Pole	GO 95, Rule 35: Vegetation was placing strain on the cable.	Completed - Zayo completed vegetation reduction to relieve the cable strain.
85	Berkeley	Pole	GO 95, Rule 84.7-A: Vegetation was impeding climbing space.	Completed - Zayo completed vegetation reduction to clear the climbing space.
89	Concord	Vault	GO 128, Rule 17.8: Ownership mark was missing.	Completed - Zayo installed new ownership markings.
93	Martinez	Vault	GO 128, Rule 17.1: Facility was not found; the facility-location record was incorrect.	Initiated - Zayo initiated an audit for correction of the facility-location record.
94	Martinez	Pole	GO 95, Rule 84.6-B: Ground wire was exposed.	Completed - Zayo corrected the ground-wire exposure.
97	Martinez	Pole	GO 95, Rule 31.1: Pole transfer was incomplete.	Dispatched - Zayo dispatched the location for completion of the pole transfer.
100	Martinez	Pole	GO 95, Rule 84.6-D: Riser cable was unattached to the pole.	Completed - Zayo corrected the riser attachment.

V. Observations

For the third-party conditions identified in Section V, Zayo sent notifications to the responsible utility or entity as reflected below.

Location #	City	Structure Type	Audit Finding	Corrective / Preventive Action
6	Pleasanton	Pole	GO 95, Rule 18-A: Third-party telecommunications terminal box was not attached to the pole.	Notification sent - Zayo sent a third-party notification to the responsible utility.
14	Discovery Bay	Pole	GO 95, Rule 18-A: Pole had a significant lean.	Notification sent - Zayo sent a third-party notification to the responsible utility.
21	Brentwood	Pole	GO 95, Rule 18-A: Third-party telecommunications service drop appeared abandoned.	Notification sent - Zayo sent a third-party notification to the responsible utility.
27	Hayward	Pole	GO 95, Rule 18-A: Third-party cable riser was damaged. GO 95, Rule 18-A: Third-party telecommunications conductor was low-hanging.	Notification sent - Zayo sent third-party notifications concerning both observed conditions.
29	Hayward	Access Hole	GO 95, Rule 18-A: City sign post created a tripping hazard near the manhole.	Notification sent - Zayo sent a third-party notification to the responsible entity.
36	Hayward	Pole	GO 95, Rule 18-A: Third-party telecommunications riser cover was less than 8 feet above ground.	Notification sent - Zayo sent a third-party notification to the responsible utility.

Location #	City	Structure Type	Audit Finding	Corrective / Preventive Action
42	Fremont	Pole	GO 95, Rule 18-A: Electrical neutral was in contact with the street light.	Notification sent - Zayo sent a third-party notification to the responsible utility.
48	Fremont	Pole	GO 95, Rule 18-A: Pole had a significant lean.	Notification sent - Zayo sent a third-party notification to the responsible utility.
57	Fremont	Pole	GO 95, Rule 18-A: Third-party telecommunications facilities were contacting a light pole.	Notification sent - Zayo sent a third-party notification to the responsible utility.
59	Alameda	Pole	GO 95, Rule 18-A: Cable television service drop appeared abandoned.	Notification sent - Zayo sent a third-party notification to the responsible utility.
63	Oakland	Pole	GO 95, Rule 18-A: Old pole required removal after all facilities had been transferred. GO 95, Rule 18-A: Third-party telecommunications terminal box was not attached to the pole.	Notification sent - Zayo sent third-party notifications concerning both observed conditions.
67	Oakland	Pole	GO 95, Rule 18-A: Third-party telecommunications service drop appeared abandoned.	Notification sent - Zayo sent a third-party notification to the responsible utility.
72	Oakland	Pole	GO 95, Rule 18-A: Transfer of third-party telecommunications facilities was incomplete.	Notification sent - Zayo sent a third-party notification to the responsible utility.
75	Berkeley	Pole	GO 95, Rule 18-A: Pole had a significant lean.	Notification sent - Zayo sent a third-party notification to the responsible utility.
82	Berkeley	Pole	GO 95, Rule 18-A: Third-party telecommunications riser cover was less than 8 feet above ground.	Notification sent - Zayo sent a third-party notification to the responsible utility.
97	Martinez	Pole	GO 95, Rule 18-A: Transfer of third-party telecommunications facilities was incomplete.	Notification sent - Zayo sent a third-party notification to the responsible utility.
98	Martinez	Pole	GO 95, Rule 18-A: Cable television service drop appeared abandoned.	Notification sent - Zayo sent a third-party notification to the responsible utility.
101	Concord	Pole	GO 95, Rule 18-A: Electrical ground wire was exposed.	Notification sent - Zayo sent a third-party notification to the responsible utility.