

PUBLIC UTILITIES COMMISSION

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August 21, 2026

CA2026-1437

David Urbach

Director, Underlying Rights & Government Regulations –North America

Zayo

1401 Wynkoop St.

Denver, CO 80202

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Zayo's East Bay Region

Mr. Urbach:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Charles Mee of ESRB staff conducted a CIP audit of Zayo's East Bay Region from July 6 through July 10, 2026. During the audit, ESRB staff conducted field inspections of Zayo'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 September 21, 2026, via electronic copy of all corrective actions and preventive measures taken by Zayo 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 Emiliano Solorio at (916) 216-0249 or emiliano.solorio@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 Audit Findings of Zayo East Bay Region

Cc: Lee Palmer, Deputy Executive Director, Safety Policy Division, Water Division, CPUC
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Ricky Martin Jr., Director, Regional OSP Operations, Construction, Zayo

ZAYO EAST BAY REGION
COMMUNICATIONS AUDIT FINDINGS
July 6-10, 2026

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Zayo's East Bay Region:

- Facility statistics as of April 2026, including miles of overhead lines, miles of underground lines, number of poles, and number of vaults.
- Overhead and Underground facility maps as of April 2026.
- Current and previous versions of wired and wireless, OH and UG maintenance policies, procedures, and programs, that were effective from February 2021 through January 2026 for compliance with GOs 95 and 128.
- Current inspector training program for compliance with GOs 95 and 128.
- Patrol and detailed inspection records from February 2021 through January 2026.
- Work orders records for wired and wireless, OH and UG facilities containing data for inspected facility type, facility location, repair, and completed date from February 2021 through January 2026.
- Safety Hazards Notifications sent to third-party utilities from February 2021 through January 2026.
- Safety Hazards Notifications received from third-party utilities from February 2021 through January 2026.
- Pole loading calculations from February 2021 through January 2026.
- Intrusive test records from February 2021 through January 2026.
- New construction projects from February 2025 through January 2026.

II. Records Violations

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

1. General Order (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 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 staff reviewed the trouble tickets provided in the East Bay TTN Report¹ provided by Zayo. The trouble tickets were not assigned a priority level based on the safety hazard of the work needed to be completed. Zayo must establish a maintenance program where the trouble tickets are assigned a priority based on the safety hazard.

¹ CONFIDENTIAL Zayo Response to East Bay Region Pre-Audit Data Request, East Bay TTN Report.

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

“In Tiers 2 and 3 of the High Fire-Threat District, inspection intervals for (i) Communication Lines located on Joint Use Poles (see Rule 21.8) that contain Supply Circuits (see Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table.”

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

Based on Zayo’s facility location data, Zayo has communication lines on poles in Tier 2 and Tier 3 High Fire-Threat Districts (HFTD).² ESRB reviewed the pole locations in the All Zayo Pole Testing 2021-2026³ record provided by Zayo in response to providing patrol and detailed inspection records. The pole locations did not include any poles that are located in Tier 2 or Tier 3 HFTD.

Zayo is missing inspections for poles that are located in Tier 2 and Tier 3 HFTD. Zayo is required to conduct patrol inspections every 2 years and detailed inspections every 10 years for overhead facilities on poles in Tier 2 HFTD. Zayo is required to conduct patrol inspections every year and detailed inspections every 5 years for overhead facilities on poles in Tier 3 HFTD.

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

“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...”

The All Zayo Pole Testing 2021-2026⁴ record provided by Zayo in response to providing patrol and detailed inspection records does not identify the date of each inspection of the facility, the results of each inspection, and the personnel involved with the inspection of facilities as required by GO 95, Rule 80.1-A(4). The record only provides results from a pole loading calculation.

Zayo must include information noting the date of each facility inspection, the results of each inspection, and the personnel who performed the inspection.

² CONFIDENTIAL Zayo Response to East Bay Region Pre-Audit Data Request, Zayo East Bay Map KMZ 061926

³ CONFIDENTIAL Zayo Response to East Bay Region Pre-Audit Data Request, All Zayo Pole Testing 2021-2026.

⁴ CONFIDENTIAL Zayo Response to East Bay Region Pre-Audit Data Request, All Zayo Pole Testing 2021-2026.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities listed in Table 1:

Table 1: Locations of East Bay Region Field Inspection

Loc #	Structure Type	City	Lat	Long
1	Vault	Livermore	37.67622	-121.75349
2	Hand Hole	Livermore	37.69427	-121.77052
3	Vault	Livermore	37.69461	-121.76978
4	Pole	Pleasanton	37.65865	-121.88433
5	Pole	Pleasanton	37.65858	-121.88476
6	Pole	Pleasanton	37.65857	-121.88526
7	Pole	Dublin	37.70346	-121.90167
8	Vault	Dublin	37.70699	-121.91505
9	Vault	Discovery Bay	37.88953	-121.62053
10	Vault	Discovery Bay	37.88955	-121.62277
11	Pole	Discovery Bay	37.88963	-121.62294
12	Pole	Discovery Bay	37.88190	-121.63142
13	Pole	Discovery Bay	37.88171	-121.63228
14	Pole	Discovery Bay	37.88186	-121.63052
15	Pole	Discovery Bay	37.87602	-121.69660
16	Pole	Discovery Bay	37.87672	-121.69660
17	Pole	Brentwood	37.90377	-121.70270
18	Pole	Brentwood	37.90367	-121.70182
19	Pole	Brentwood	37.91786	-121.69634
20	Pole	Brentwood	37.91816	-121.69632
21	Pole	Brentwood	37.91829	-121.69632
22	Vault	Brentwood	37.92570	-121.69640
23	Vault	Brentwood	37.92569	-121.69706
24	Pole	Brentwood	37.93396	-121.69939
25	Pole	Brentwood	37.93382	-121.69927
26	Pole	Hayward	37.93301	-121.69616
27	Pole	Hayward	37.93331	-121.69636
28	Vault	Hayward	37.93638	-121.67783
29	Access Hole	Hayward	37.68654	-122.10167
30	Access Hole	Hayward	37.65412	-122.06909
31	Vault	Hayward	37.65398	-122.06929
32	Pole	Hayward	37.64236	-122.06596
33	Pole	Hayward	37.64260	-122.06610
34	Pole	Hayward	37.64294	-122.06630
35	Vault	Hayward	37.64117	-122.06531

Loc #	Structure Type	City	Lat	Long
36	Pole	Hayward	37.63164	-122.09523
37	Pole	Hayward	37.63152	-122.09548
38	Pole	Hayward	37.63142	-122.09565
39	Vault	Hayward	37.63144	-122.09567
40	Access Hole	Fremont	37.47344	-121.92021
41	Pole	Fremont	37.47356	-121.92033
42	Pole	Fremont	37.47402	-121.92062
43	Pole	Fremont	37.50810	-121.94797
44	Pole	Fremont	37.50778	-121.94758
45	Vault	Fremont	37.50784	-121.94737
46	Pole	Fremont	37.50720	-121.92560
47	Pole	Fremont	37.50684	-121.92539
48	Pole	Fremont	37.50747	-121.92587
49	Vault	Fremont	37.50659	-121.92011
50	Pole	Fremont	37.50657	-121.92013
51	Pole	Fremont	37.50659	-121.92051
52	Vault	Fremont	37.53036	-121.92051
53	Pole	Fremont	37.53036	-121.92057
54	Pole	Fremont	37.53063	-121.92060
55	Pole	Fremont	37.53229	-121.92120
56	Pole	Fremont	37.53265	-121.92127
57	Pole	Fremont	37.53294	-121.92135
58	Pole	Alameda	37.77300	-122.26497
59	Pole	Alameda	37.77294	-122.26540
60	Pole	Alameda	37.77292	-122.26576
61	Vault	Alameda	37.77110	-122.25655
62	Pole	Oakland	37.79615	-122.24776
63	Pole	Oakland	37.79590	-122.24819
64	Vault	Oakland	37.79873	-122.24728
65	Vault	Oakland	37.81802	-122.24525
66	Pole	Oakland	37.81803	-122.24528
67	Pole	Oakland	37.81803	-122.24547
68	Pole	Oakland	37.81808	-122.24565
69	Pole	Oakland	37.81863	-122.24914
70	Pole	Oakland	37.81884	-122.24937
71	Pole	Oakland	37.81899	-122.24959
72	Pole	Oakland	37.81907	-122.24945
73	Pole	Berkeley	37.84674	-122.27993
74	Pole	Berkeley	37.84680	-122.27951
75	Pole	Berkeley	37.84740	-122.29376
76	Pole	Berkeley	37.84741	-122.29323

Loc #	Structure Type	City	Lat	Long
77	Access Hole	Berkeley	37.86673	-122.29254
78	Pole	Berkeley	37.86684	-122.28744
79	Pole	Berkeley	37.86690	-122.28706
80	Pole	Berkeley	37.86706	-122.28703
81	Pole	Berkeley	37.87273	-122.27799
82	Pole	Berkeley	37.87281	-122.27764
83	Pole	Berkeley	37.89294	-122.29078
84	Pole	Berkeley	37.89289	-122.29035
85	Pole	Berkeley	37.89290	-122.28995
86	Vault	Berkeley	37.89277	-122.29510
87	Pole	Berkeley	37.89277	-122.29510
88	Pole	Berkeley	37.89272	-122.29545
89	Vault	Concord	37.98509	-122.01701
90	Pole	Concord	37.98371	-122.02001
91	Pole	Concord	37.98411	-122.02030
92	Pole	Concord	37.98445	-122.02061
93	Vault	Martinez	38.01585	-122.13311
94	Pole	Martinez	38.01586	-122.13313
95	Pole	Martinez	38.01607	-122.13211
96	Pole	Martinez	38.01598	-122.13195
97	Pole	Martinez	38.01018	-122.12167
98	Pole	Martinez	38.00984	-122.12212
99	Vault	Martinez	38.00985	-122.08943
100	Pole	Martinez	38.00981	-122.08938
101	Pole	Concord	37.95062	-122.03619

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 2:

Table 2: GO 95, Rule 31.1 Findings

Location	Findings
7	Facility was not found. Incorrect record of facility location.
26	Facility was not found. Incorrect record of facility location.
72	Incomplete pole transfer
73	Incomplete pole transfer
97	Incomplete pole transfer

2. 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).”

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

Table 3: GO 95, Rule 35 Findings

Location	Findings
12	Vegetation strain on cable
13	Vegetation strain on cable

Location	Findings
81	Vegetation strain on cable

3. 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.”

ESRB’s finding related to the above rule is listed in Table 4:

Table 4: GO 95, Rule 38 Finding

Location	Finding
18	Zayo cable in contact with telco

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).”

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

Table 5: GO 95, Rule 84.6-B Findings

Location	Findings
25	Exposed ground wire

Location	Findings
94	Exposed ground wire

5. GO 95, Rule 84.6-D, Vertical Runs states in part:

“...Runs of bridled conductors, attached to surface of pole, need not be covered provided such runs are below and on the same side of pole with a cable arm and are not in climbing space, or are connected to service drops which are placed in accordance with the provisions of Rule 84.8-B2b. Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches...”

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

Table 6: GO 95, Rule 84.6-D Findings

Location	Findings
11	Riser cable unattached to pole
21	Riser cable unattached to pole
25	Riser cable unattached to pole
75	Riser cable unattached to pole
100	Riser cable unattached to pole

6. GO 95, Rule 84.7-A, Climbing Space and Working Space states in part:

“Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4-C1c, 84.4-D1 and 87.4-C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4-C1c...”

...The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7-A5.”

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

Table 7: GO 95, Rule 84.7-A Findings

Location	Findings
13	Vegetation impeding climbing space
46	Vegetation impeding climbing space
51	Vegetation impeding climbing space
85	Vegetation impeding climbing space

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

“...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 finding related to the above rule is listed in Table 8:

Table 8: GO 95, Rule 86.2 Finding

Location	Finding
38	Guy wire is slacked

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.”

ESRB’s finding related to the above rule is listed in Table 9:

Table 9: GO 95, Rule 86.9 Finding

Location	Finding
11	Guy wire guard broken

9. GO 95, Rule 87.7-D (1), Covering or Guarding, 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.”

GO 95, Rule 22.8 A Protective Covering, Suitable, Ground Wire, Bond Wire, and Communication Conductor, states in part:

“(2) Flexible and Rigid Conduit, and Rigid U-Shaped Moulding of plastic or other material, as tested according to National Electrical Manufacturers Association (NEMA) Standards TC 2-1998 (for Plastic Conduit) and TC 19-2001 (for Plastic U-Shaped Moulding), shall:

(a) Have a normal temperature minimum impact strength equal to one-half nominal EPC-40-PVC conduit (50 ft.-lbs) using the test method specified in NEMA TC 2-1998, and a low temperature minimum impact strength equal to 12.5ft.-lbs using the test method specified in TC 19-2001; and

(b) Have a minimum insulating efficiency of 12 kV/in. dry;

(c) Meet the minimum sunlight resistance of 100,000 Langleys, or equivalent laboratory ultra violet test, of TC 19-2001.

(3) Plastic or Other Non-Conductive Material meeting the requirements of 22.8-A(2).”

ESRB’s finding related to the above rules is listed in Table 10:

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

Location	Finding
36	Riser cover found less than 8 feet

10. 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 11:

Table 11: GO 128, Rule 17.1 Findings

Location	Findings
2	Facility was not found. Incorrect record of facility location.
22	Facility was not found. Incorrect record of facility location.
28	Facility was not found. Incorrect record of facility location.
64	Facility was not found. Incorrect record of facility location.
77	Facility was not found. Incorrect record of facility location.
93	Facility was not found. Incorrect record of facility location.

11. 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
3	Missing Ownership Mark

Location	Findings
8	Missing Ownership Mark
9	Missing Ownership Mark
10	Missing Ownership Mark
23	Missing Ownership Mark
35	Missing Ownership Mark
39	Missing Ownership Mark
49	Missing Ownership Mark
65	Missing Ownership Mark
89	Missing Ownership Mark

V. Observations

1. 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 GO 95.”*

During the field inspection, ESRB noted the third-party safety concerns listed in Table 13. Third-party notifications must be sent to the respective utilities for the items below:

Table 13: Third-Party Observations

Location	Observations
6	Telco terminal box not attached to pole
14	Pole has significant lean
21	Telco has abandoned service drop
27	Damaged cable riser
27	Low hanging telco conductor
29	Tripping hazard from city sign post near manhole
36	Telco riser cover less than 8 feet

Location	Observations
42	Electrical neutral in contact with street light
48	Pole has significant lean
57	Telco facilities contacting light pole
59	Cable TV has abandoned service drop
63	Old pole needs removal. All facilities have been transferred.
63	Telco terminal box not attached to pole
67	Telco has abandoned service drop
72	Incomplete transfer of telco facilities
75	Pole has significant lean
82	Telco riser cover less than 8 feet
97	Incomplete transfer of telco facilities
98	Cable TV has abandoned service drop
101	Exposed electrical ground wire