STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

March 30, 2026 CA2026-1438

Saira Pasha
Area Manager - Regulatory
AT&T Services, Inc.
430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Marin, Napa, and Sonoma County Region

Ms. Pasha:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Matthew Yunge and Javier Reyes of ESRB staff conducted a CIP audit of AT&T's Marin, Napa, and Sonoma County region from February 23 to February 27, 2026. During the audit, ESRB staff conducted field inspections of AT&T's 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 April 28, 2026, by electronic copy of all corrective actions and preventive measures taken by AT&T 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 the audit on the CPUC website. If there is any information in your response that you want 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 CIP Audit Report for AT&T Marin, Napa, and Sonoma County Region

Cc: Lee Palmer, Deputy Executive Director, Safety and Enforcement, Safety Policy, and Water Division, CPUC
Chihsien "Eric" Wu, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Program and Project Supervisor, ESRB, SED, CPUC
Yi "Rocky" Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
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Javier Reyes, Utilities Engineer, ESRB, SED, CPUC
Matthew Yunge, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Ross Johnson, Director-Regulatory, AT&T Services, Inc.
Josh Mathisen, Director-Regulatory, AT&T Services, Inc.

CPUC AUDIT FINDINGS OF AT&T

MARIN, NAPA, and SONOMA COUNTIES

FEBRUARY 23 - 27, 2026

I. Records Review

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

- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines Procedure
- AT&T's Facility Statistics of the Marin, Napa, and Sonoma Counties service areas
- AT&T's List of Facility Locations
- General Order (GO) 95 Patrol/Detailed Inspections conducted in the last 5 years (December 1, 2020, through November 30, 2025)
- Work Orders created in the last 5 years (December 1, 2020, through November 30, 2025)
- Pole Loading Calculations conducted in the last 5 years (December 1, 2020, through November 30, 2025)
- Safety Hazard Notifications AT&T received and sent to Third Parties in the last 5 years (December 1, 2020, through November 30, 2025)
- New Construction Projects Completed in the last 12 months (December 1, 2024, through November 30, 2025)

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."*

AT&T's Overhead Lines Maintenance Plan assigns the following work order priority levels:

Table 1. AT&T Priority Level Due Dates

Priority Level	Required Due Date
1	• 72 hours
2	• 36 months
2a	• 12 months
2b	• 12 months if in Fire Map Tier 2 • 6 months if in Fire Map Tier 3 • 36 months if in Fire Map Tier 1
2c	• 12 months if in Fire Map Tier 2 and 1 • 6 months if in Fire Map Tier 3
3	• 60 months

ESRB's review of AT&T's overhead work orders from December 1, 2020 through November 30, 2025 found that 7,941 overhead work orders are late. Late-pending work orders are pending work orders that have not been completed by their required or assigned due date, and late-closed work orders are work orders that were completed past their required or assigned due date. **Table 2** below breaks down the 7,941 late overhead work orders by priority level.

Table 2. Late Overhead Facility Work Orders

Priority Level	Late-Pending Work Orders[1]	Late-Complete Work Orders	Total Late Work Orders
1	19	812	831
2	1582	1760	3342
2a	643	48	691
2b	1026	649	1675
2c	126	58	184
3	1218	0	1218
Total	4614	3327	7941

[1] As of January 30, 2026.

AT&T must provide ESRB with its corrective action plan to complete the 7,941 late-pending overhead work orders and its preventive measures to prevent any work orders from being completed late in the future.

The most overdue work orders are listed in Table 3 below:

Table 3. Most Overdue Overhead Facility Work Orders

Work Order Package ID	Priority	Creation Date	Due Date	Number of Days Late[2]
833539	1	2021-05-20	2021-05-23	270
813409	2	2020-12-01	2023-12-01	791
813410	2	2020-12-01	2023-12-01	791
813411	2	2020-12-01	2023-12-01	791
813498	2	2020-12-01	2023-12-01	791
813557	2	2020-12-01	2023-12-01	791
813592	2	2020-12-01	2023-12-01	791
813660	2	2020-12-01	2023-12-01	791
837277	2	2020-12-01	2023-12-01	791
837285	2	2020-12-01	2023-12-01	791
837341	2	2020-12-01	2023-12-01	791
837483	2	2020-12-01	2023-12-01	791
837892	2	2020-12-01	2023-12-01	791
813413	2a	2020-12-02	2021-12-02	1520
829410	2b	2020-12-01	2021-06-01	1704
837612	2c	2020-12-02	2021-06-02	1703
747457	3	2020-09-24	2025-09-24	128
747469	3	2020-09-24	2025-09-24	128
747470	3	2020-09-24	2025-09-24	128
747472	3	2020-09-24	2025-09-24	128
747474	3	2020-09-24	2025-09-24	128

2. **GO 128, Rule 17.1, Design, Construction and Maintenance** states:

> *"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,*

[2] For open work orders, the number of days counted are based on January 30, 2026.

construction, or maintenance of [the] communication or supply lines and equipment."

ESRB's review of AT&T's underground work orders from December 1, 2020 through November 30, 2025 found that 25 underground work orders were completed past their assigned due date. Table 4 below breaks down the 25 late underground work orders.

Table 4. Late Underground Facility Work Orders

	Late-Pending Work Orders	Late-Complete Work Orders
Total	0	25

3. **GO 95, Rule 80.1.A(1) Inspection Requirements for Communication Lines: Patrol and Detailed Inspections, Inspection Requirements for Joint-Use Poles in High Fire-Treat District** states in part:

"In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines … 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

…the term "year" is defined as 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months, not to exceed the end of the calendar year in which the next inspection is due."

ESRB's review of AT&T's Inspection History from December 1, 2020 through November 30, 2025 found that 137 Distribution Area (DA) inspections were completed past their required reinspection date. Table 5 below breaks down the 137 late inspections by HFTD Tier.

Table 5. Late Distribution Area (DA) Inspections by HFTD Tier

HFTD	Late DA Inspections
Tier 2	55
Tier 3	82
Total	**137**

AT&T must implement practices to ensure that patrol inspections in HFTD areas are conducted at the proper intervals.

III. Field Inspection

During the field inspection from February 23-27, 2026, ESRB staff inspected AT&T's communication facilities in the locations listed in Table 6.

Table 6. Field Inspection Locations

Location #	Structure Type	Longitude, Latitude
1	Wood Pole	-122.68210737, 38.47165868
2	Wood Pole	-122.68313852, 38.47175666
3	Wood Pole	-122.68317354, 38.47119427
4	Wood Pole	-122.68338061, 38.47068891
5	Wood Pole	-122.68332655, 38.47015543
6	Wood Pole	-122.67888643, 38.44454214
7	Wood Pole	-122.67827997, 38.44456784
8	Wood Pole	-122.6779203, 38.44471358
9	Wood Pole	-122.67748589, 38.44477573
10	Wood Pole	-122.67706902, 38.44481699
11	Wood Pole	-122.67671621, 38.44492158
12	Wood Pole	-122.67671621, 38.44492158
13	Wood Pole	-122.67722154, 38.4455061
14	Wood Pole	-122.71710659, 38.42948008
15	Wood Pole	-122.71650623, 38.42946508
16	Wood Pole	-122.71588999, 38.42959471

Location #	Structure Type	Longitude, Latitude
17	Wood Pole	-122.71583339, 38.42923803
18	Wood Pole	-122.71572052, 38.42872921
19	Wood Pole	-122.71581084, 38.42875019
20	Communication Vault	-122.69795914, 38.3518068
21	Communication Vault	-122.69838686, 38.35184072
22	Communication Vault	-122.69901665, 38.35189708
23	Communication Vault	-122.69923965, 38.35191824
24	Communication Vault	-122.69999992, 38.35204574
25	Communication Vault	-122.70019858, 38.35185221
26	Wood Pole	-123.02136426, 38.84509963
27	Wood Pole	-123.02260713, 38.84514377
28	Wood Pole	-123.02008771, 38.84537562
29	Wood Pole	-123.01968897, 38.80754193
30	Wood Pole	-123.01922285, 38.80774653
31	Wood Pole	-123.01853897, 38.80805335
32	Wood Pole	-123.01841643, 38.80801734
33	Wood Pole	-123.01822446, 38.80811658
34	Wood Pole	-123.01802692, 38.80821734
35	Wood Pole	-122.85900294, 38.61867028
36	Wood Pole	-122.85903058, 38.61916218
37	Wood Pole	-122.85911534, 38.61970013
38	Wood Pole	-122.85916367, 38.62006456

Location #	Structure Type	Longitude, Latitude
39	Wood Pole	-122.85900552, 38.61835206
40	Wood Pole	-122.85887327, 38.61815689
41	Wood Pole	-122.85935867, 38.61805203
42	Wood Pole	-123.05873616, 38.32708821
43	Wood Pole	-123.05828646, 38.32666879
44	Wood Pole	-123.05766871, 38.32631134
45	Wood Pole	-123.05910671, 38.32753246
46	Wood Pole	-123.05937937, 38.3278876
47	Wood Pole	-123.05979612, 38.32847425
48	Wood Pole	-123.07475913, 38.3736558
49	Wood Pole	-123.07506429, 38.37403641
50	Wood Pole	-123.0753687, 38.37444349
51	Wood Pole	-123.07574479, 38.37495765
52	Wood Pole	-123.07600429, 38.37540834
53	Wood Pole	-123.0745648, 38.37343137
54	Wood Pole	-123.000394, 38.50261665
55	Wood Pole	-123.00046412, 38.50272008
56	Wood Pole	-123.00047371, 38.50314985
57	Wood Pole	-122.99996033, 38.50309872
58	Wood Pole	-122.99953104, 38.50310045
59	Wood Pole	-122.99929555, 38.50314184
60	Wood Pole	-122.89476141, 38.47973833

Location #	Structure Type	Longitude, Latitude
61	Wood Pole	-122.89477081, 38.47923143
62	Wood Pole	-122.89477522, 38.47890918
63	Wood Pole	-122.89472535, 38.47870499
64	Wood Pole	-122.8948332, 38.47999016
65	Wood Pole	-122.37581867, 38.69997802
66	Wood Pole	-122.37572272, 38.69946424
67	Wood Pole	-122.37584669, 38.69899821
68	Wood Pole	-122.37574431, 38.6985587
69	Wood Pole	-122.37579586, 38.69826086
70	Wood Pole	-122.37566577, 38.69779335
71	Wood Pole	-122.37492506, 38.69884239
72	Wood Pole	-122.4530149, 38.57700942
73	Wood Pole	-122.45349296, 38.57720094
74	Wood Pole	-122.45402727, 38.57735064
75	Wood Pole	-122.45443244, 38.57749988
76	Wood Pole	-122.45210932, 38.57669103
77	Wood Pole	-122.45214201, 38.5769683
78	Wood Pole	-122.59826115, 38.59488149
79	Wood Pole	-122.59837783, 38.59489807
80	Wood Pole	-122.59796198, 38.59454536
81	Wood Pole	-122.597448, 38.59409169
82	Wood Pole	-122.59732328, 38.59399364

Location #	Structure Type	Longitude, Latitude
83	Wood Pole	-122.43675315, 38.48702496
84	Wood Pole	-122.43724477, 38.48669206
85	Wood Pole	-122.43769524, 38.48633163
86	Wood Pole	-122.4379227, 38.48615393
87	Wood Pole	-122.43833117, 38.48583935
88	Wood Pole	-122.43876856, 38.48555383
89	Wood Pole	-122.43881694, 38.48557883
90	Wood Pole	-122.29417931, 38.31723942
91	Wood Pole	-122.29409619, 38.31693011
92	Wood Pole	-122.29402252, 38.31661931
93	Wood Pole	-122.29437791, 38.31778934
94	Wood Pole	-122.29454093, 38.31834623
95	Wood Pole	-122.29479324, 38.31840341
96	Wood Pole	-122.29391447, 38.31732301
97	Wood Pole	-122.29351549, 38.31736458
98	Wood Pole	-122.44938578, 38.24501724
99	Wood Pole	-122.44933281, 38.24521714
100	Wood Pole	-122.44941132, 38.24536224
101	Wood Pole	-122.44933373, 38.24600167
102	Wood Pole	-122.45654888, 38.3260844
103	Wood Pole	-122.45587143, 38.32625992
104	Wood Pole	-122.45736351, 38.32576769

Location #	Structure Type	Longitude, Latitude
105	Wood Pole	-122.45796366, 38.3258428
106	Wood Pole	-122.45893998, 38.32600256
107	Wood Pole	-122.45682786, 38.32555506
108	Wood Pole	-122.46839779, 38.29128396
109	Wood Pole	-122.46827776, 38.29187559
110	Wood Pole	-122.46833502, 38.29212732
111	Wood Pole	-122.68645545, 38.24160982
112	Wood Pole	-122.68726371, 38.24162237
113	Wood Pole	-122.68795101, 38.24162078
114	Wood Pole	-122.68857144, 38.24170902
115	Wood Pole	-122.68924677, 38.24174435
116	Wood Pole	-122.64102824, 38.22590255
117	Wood Pole	-122.64120729, 38.22558985
118	Wood Pole	-122.64148568, 38.22520541
119	Wood Pole	-122.64165111, 38.22486883
120	Wood Pole	-122.64202195, 38.22458056
121	Wood Pole	-122.64211766, 38.22416722
122	Wood Pole	-122.64087154, 38.22643426
123	Wood Pole	-122.64054791, 38.22670135
124	Wood Pole	-122.64047197, 38.22690239
125	Wood Pole	-122.63315511, 38.24906632
126	Wood Pole	-122.63351933, 38.24931642

Location #	Structure Type	Longitude, Latitude
127	Wood Pole	-122.63400047, 38.24936866
128	Wood Pole	-122.63423297, 38.24959452
129	Wood Pole	-122.63275517, 38.24895292
130	Wood Pole	-122.63247161, 38.24871701
131	Wood Pole	-122.56216246, 38.06769347
132	Wood Pole	-122.56281674, 38.06786994
133	Wood Pole	-122.56350506, 38.06786408
134	Wood Pole	-122.56423251, 38.06770245
135	Wood Pole	-122.56496589, 38.06781183
136	Wood Pole	-122.86415176, 38.10001305
137	Wood Pole	-122.86359756, 38.10011152
138	Wood Pole	-122.86334094, 38.10019544
139	Wood Pole	-122.86279106, 38.1005382
140	Wood Pole	-122.86219725, 38.10059491
141	Wood Pole	-122.69057681, 38.01369012
142	Wood Pole	-122.69106958, 38.01366221
143	Wood Pole	-122.6914286, 38.01364753
144	Wood Pole	-122.6904375, 38.01331005
145	Wood Pole	-122.69040095, 38.01394221
146	Wood Pole	-122.57764462, 37.97804203
147	Wood Pole	-122.57709461, 37.97808661
148	Wood Pole	-122.57672444, 37.97818345

Location #	Structure Type	Longitude, Latitude
149	Wood Pole	-122.57647679, 37.9781523
150	Wood Pole	-122.51324155, 38.01571365
151	Wood Pole	-122.51296283, 38.01603982
152	Wood Pole	-122.51267008, 38.01634123
153	Wood Pole	-122.51257564, 38.01661124
154	Wood Pole	-122.63484092, 37.89920795
155	Wood Pole	-122.63462082, 37.8984757
156	Wood Pole	-122.63429473, 37.89793056
157	Wood Pole	-122.63477057, 37.89752837
158	Wood Pole	-122.54171629, 37.89588558
159	Wood Pole	-122.54229943, 37.8960045
160	Wood Pole	-122.54261303, 37.89608474
161	Wood Pole	-122.5428919, 37.89608792
162	Wood Pole	-122.54180306, 37.89554263
163	Wood Pole	-122.45495011, 37.87520588
164	Wood Pole	-122.45494377, 37.87548327
165	Wood Pole	-122.45498456, 37.87589704
166	Wood Pole	-122.4551255, 37.87615416
167	Wood Pole	-122.45533644, 37.87630887

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 7:

Table 7: GO 95, Rule 31.1 Findings

Location	Findings
13	AT&T case is open.
14	Open terminal case.
15	Open AT&T case.
27	Open AT&T case.
54	AT&T case is open.
59	Incomplete pole transfer.
64	Incomplete pole transfer.
67	Loose ground wire.
74	Incomplete pole transfer.
76	Incomplete pole transfer.
77	Incomplete pole transfer.
88	Hanging cable cover.
101	Rope tied around pole.
108	Screw for riser attachment is loose.
110	Damaged riser.
134	Down guy anchor buried.
135	Incomplete pole transfer.
139	Open terminal case.
144	Buried down guy anchor.

Location	Findings
155	Anchor buried under vegetation debris.
164	Incomplete pole transfer.
165	Down guy wire coiled on down guy.

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 8:

Table 8: GO 95, Rule 31.6 Findings

Location	Findings
1	Abandoned service drops.
4	Abandoned service drop.
42	Abandoned service drop on buddy pole.
46	Messenger wire abandoned and hanging low.
78	Abandoned service drop.
88	Abandoned service drop.
98	Abandoned service drop.
128	Abandoned line.
135	Abandoned line and down guy.
161	Abandoned service drop.

3. **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."

ESRB's findings related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 34 Findings

Location	Findings
130	Unauthorized attachment.
161	Fence tied to down guy.

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

"Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies.

When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that dead, rotten or diseased trees or dead, rotten or diseased portions of otherwise healthy trees overhang or lean toward and may fall into a span of supply or communication lines, said trees or portions thereof should be removed. Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. 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."

ESRB's findings related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 35 Findings

Location	Findings
123	Contact and deflection by vegetation.
149	AT&T line deflected by vegetation.
161	Line strained due to vegetation.

5. **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."*

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

Table 11: GO 95, Rule 37 Findings

Location	Findings
6	Low service drops. Clearance is 15 feet at curb and 7.5 feet at pedestrian-only location.
52	Service drops are attached to exterior wall of house.
60	Sagging drops at mid span.
61	Sagging drops mid span.
75	Service drop along road is low.
145	Service drop laying on a roof.
165	Service drop too low to ground.

6. **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 findings related to the above rule are listed in Table 12:

Table 12: GO 95, Rule 38 Findings

Location	Findings
9	Service drops in contact with other utility drops.
14	AT&T fiber contacting Comcast line.
37	AT&T service drop attached to other utility line.
40	AT&T service drop contacting other utility service drop.
58	AT&T contacting Comcast service drop.
72	Service drop contacting other utility service drop.
75	AT&T drop contacting other utility line.
75	AT&T drop contacting down guy.
91	Service drops contacting other utility service drops.
92	AT&T service drops touching other utility lines.
114	AT&T line contacting other utility line.
123	Comcast service drops touching AT&T service drops.
123	AT&T line contacting Comcast line. Comcast line might be abandoned.
128	AT&T service drop on Comcast drop.
135	AT&T contacting other utility service drop.
136	AT&T attached to Comcast level and touching Comcast line.
147	Span guy touching AT&T service drops.
149	Comcast line wrapped around AT&T line.
156	AT&T hanging on Comcast line.
158	Comcast line and service drop contacting AT&T line.

7. **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 13:

Table 13: GO 95, Rule 44.3 Findings

Location	Findings
27	About a dozen woodpecker holes throughout pole affecting structural integrity.
66	Several medium-sized woodpecker holes.
112	Broken lashing wire.

8. **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 14:

Table 14: GO 95, Rule 84.6-B Findings

Location	Findings
17	Exposed ground wire.

Location	Findings
71	Exposed ground wire.
74	Exposed ground wire.
99	Exposed ground wire.
128	Exposed ground wire.
158	Exposed ground wire.
162	Exposed ground wire.

9. **GO 95, Rule 84.6-D, Vertical Runs** states:

"Vertical runs of communication wires or cables supported on the surface of wood poles or structures, shall be covered by a suitable protective covering (see Rule 22.8) where within a vertical distance of 3 feet above or 6 feet below unprotected supply conductors supported on the same pole or structure. Vertical runs of communication wires or cables on the surface of a wood pole shall be covered by a suitable protective covering where within a 6 foot radius of any other pole supporting supply conductors except that those portions of such runs which are more than 3 feet above or 6 feet below the level of unprotected supply conductors need not be covered. Cable and drop wire runs to or from terminal boxes are exempted from these requirements for covering, under the following conditions:

Where guard arms are installed above messengers or longitudinal cables which are less than 6 feet below but not less than 4 feet below unprotected supply conductors of 0 - 750 volts, or where cables are supported on crossarms at not less than 15 inches from center line of pole, in which cases any portion of metal sheathed cable runs on the surface of pole below the guard arm and in the same quadrant as the longitudinal cable (see Appendix G, Figure 87), or below and on the same side of the pole with a crossarm which supports a longitudinal cable, need not be covered.

Runs of bridled conductors, attached to surface of pole, need not be covered provided such runs are below the guard arm and in the same quadrant as the longitudinal cable, or where such runs are below and on the same side of pole with a cable arm and are not in the 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.

Vertical runs shall be treated as risers (see Rule 87.7–D) where within a distance of 8 feet from the ground line.
Runs which terminate in the top of enclosures which afford ample mechanical protection to the runs may extend within 8 feet of the ground but not less than 6 feet of the ground without being treated as risers."

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

Table 15: GO 95, Rule 84.6-D Findings

Location	Findings
36	AT&T riser not adequately attached to pole.
133	Riser not attached to pole appropriately.
149	Riser not attached to pole.

10. 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 16:

Table 16: GO 95, Rule 86.2 Findings

Location	Findings
53	Slack down guy.
77	Slack down guy.
153	AT&T and Comcast down guys are slack.

Location	Findings
154	Slack down guy.

11. 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."

ESRB's findings related to the above rule are listed in Table 17:

Table 17: GO 95, Rule 86.7.B Findings

Location	Findings
139	Vegetation touching down guy above insulator.
153	Vegetation touching down guy above insulator.

12. 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 18:

Table 18: GO 95, Rule 86.9 Findings

Location	Findings
63	Missing down guy marker.
92	Damaged anchor guy marker.

13. GO 95, Rule 87.7-D.1, Covered from Ground Level to 8 Feet above the Ground states in part:

"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."

ESRB's findings related to the above rule are listed in Table 19:

Table 19: GO 95, Rule 87.7-D.1 Findings

Location	Findings
15	Exposed service drop.
31	Loose riser cover.
33	Exposed riser.
38	Exposed riser.
39	Exposed riser held together with zip ties.
46	Exposed riser to equipment box near bottom of pole and riser cover not up to 8 feet.
47	Exposed risers.
48	Risers sticking out of cover.
54	Exposed riser.
62	Riser that is attached to equipment box near bottom of pole is exposed at less than 8 feet.

Location	Findings
63	Riser without cover.
86	Exposed riser.
92	Exposed riser.
110	Exposed risers and covers are loose.
117	Exposed riser and cover not fixed to pole properly.
129	AT&T riser cover does not go high enough.
131	Riser not covered.
132	Missing riser covers.
134	Exposed riser.
136	Exposed service drop.
138	Exposed riser.
146	Missing riser cover.
157	Exposed riser.
160	Exposed riser.
162	Exposed risers.
163	Riser not covered.
166	Exposed riser.
167	Exposed riser.

14. **GO 95, Rule 91.3, Stepping** states in part:

"*A. Unless otherwise specified in this Order, pole steps used to ascend and descend joint use wood poles are not required. However, occupants on joint use wood poles are not prohibited from installing and maintaining temporary or permanent steps.*

B. Unless non climbable, joint use nonwood poles shall include provisions for ascending and descending.

C. Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the

pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps."

ESRB's findings related to the above rule are listed in Table 20:

Table 20: GO 95, Rule 91.3 Findings

Location	Findings
96	Low pole step.
131	Pole step too low.

15. 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 21:

Table 21: GO 95, Rule 93 Findings

Location	Findings
45	Climbing space obstructed by tree.
79	Climbing space obstructed.
139	Climbing space obstructed.
145	Climbing space obstructed.
165	Climbing space obstructed.

16. 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 22:

Table 22: GO 128, Rule 17.1 Findings

Location	Findings
23	Wires not kept in terminal case.

17. **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 23:

Table 23: GO 128, Rule 17.8 Findings

Location	Findings
20	No marker on vault to identify owner.
23	No marker to identify owner.

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 24:

Table 24: Third-Party Observations

Location	Third-Party	Observations
1	Unknown	Riser exposed at bottom of pole.
2	Unknown	Cable grounded to buddy pole.
2	Unknown	Abandoned anchor for an anchor guy.
4	Sonic	Exposed riser.
5	Unknown	Abandoned service drop.
13	Unknown	Ground wire cover is bent away from pole and does not cover ground wire at approximately 9 feet from bottom of pole.
14	Pacific Gas and Electric	Slack down guy.
14	Comcast	Detached ground wire cover.
15	Comcast	Exposed service drop.

Location	Third-Party	Observations
16	Comcast	Exposed ground wire.
19	Comcast	Down guy contacting Comcast lines.
20	Comcast	Lid loose.
30	Pacific Gas and Electric	Down guy touching communications line.
30	Unknown	Exposed ground wire.
31	Comcast	Abandoned service drop.
32	Unknown	Abandoned line at bottom of pole.
33	Pacific Gas and Electric	Anchor guy bolt is loose.
35	Healdsburg Electric Department	Broken ground wire cover.
36	Unknown	Riser not adequately attached to pole.
37	Comcast	Comcast drop contacting AT&T service drops.
38	Unknown	Exposed fiber riser.
39	Healdsburg Electric Department	Exposed ground wire.
45	Comcast	Lashing wire undone near buddy pole.
47	Comcast	Riser not attached to pole at base of pole.
48	Comcast	Riser sticking out from cover at base of pole.
49	Comcast	Service drop is low.
52	Comcast	Service drop hanging on exterior wall of house.
54	Comcast	Exposed riser.
58	Unknown	Service drop hanging along exterior of house.
62	Pacific Gas and Electric	Down guy contacting Comcast line.
69	Pacific Gas and Electric	Exposed ground wire at about 6 feet from ground level.
70	Pacific Gas and Electric	Anchor guy marker is missing.
71	Pacific Gas and Electric	Vegetation touching down guy above insulator.
73	Unknown	AT&T line contacting other utility service drop.

Location	Third-Party	Observations
74	Comcast	Line improperly attached to pole.
76	Pacific Gas and Electric	Improper guy attachment on new pole.
76	Comcast	Incomplete pole transfer.
77	Pacific Gas and Electric	Down guy missing marker.
77	Comcast	Slack down guy.
77	Unknown	Abandoned anchor for anchor guy.
84	Unknown	Ground wire is not attached above ground cover.
85	Unknown	Unattached ground wire above cover.
87	Unknown	Riser not adequately attached to pole.
91	Unknown	Service drop attached to pole step.
99	Unknown	Service drop touching AT&T line.
108	Unknown	Service drop contacting AT&T line
117	Unknown	Exposed fiber drop.
119	Unknown	Service drops not attached to pole or covered.
122	Pacific Gas and Electric	Ground wire cover buckling out and exposing ground wire.
125	Comcast	Damaged ground wire cover.
126	Comcast	Abandoned service drop.
129	Pacific Gas and Electric	Vegetation touching down guy above insulator.
133	Pacific Gas and Electric	Vegetation touching down guy above insulator.
135	Comcast	Exposed service drop.
135	Comcast	Incomplete pole transfer.
136	Comcast	Exposed riser.
137	Comcast	Unused Comcast drop touching AT&T line.
138	Comcast	Exposed riser.
139	Pacific Gas and Electric	Vegetation touching down guy above insulator.
141	Comcast	Incomplete pole transfer.

Location	Third-Party	Observations
141	Comcast	Incomplete pole transfer.
142	Comcast	Low service drop.
143	Pacific Gas and Electric	Pole top appears to be deteriorating.
143	Pacific Gas and Electric	Split in cross arm.
147	Pacific Gas and Electric	Cross arm cracking.
149	Comcast	Exposed ground wire.
149	Unknown	Exposed riser.
149	Comcast	Riser not attached to pole.
150	Comcast	Comcast touching PG&E service drop.
153	Pacific Gas and Electric	Vegetation touching down guy above insulator.
153	Pacific Gas and Electric	Vegetation growing on anchor guy.
156	Comcast	Riser exposed.
160	Comcast	Comcast service drop not adequately attached to pole.
161	Comcast	Abandoned service drop.
165	Comcast	Low drop.
165	Pacific Gas and Electric	Vegetation touching down guy above insulator.
166	Comcast	Exposed riser.
167	Comcast	Exposed riser.
167	Pacific Gas and Electric	Buried anchor.