STATE OF CALIFORNIA GAVIN C. NEWSOM., *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

November 5, 2026 CA2026-1465

Patti Ringo
Regulatory & Gov't Affairs
Sonic
2260 Apollo Way
Santa Rosa, CA 95407

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Sonic's San Francisco, San Mateo, and San Jose Regions

Ms. Ringo:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Joe Murphy of ESRB staff conducted a CIP audit of Sonic's San Francisco, San Mateo, and San Jose Regions from August 31 through September 4, 2026. During the audit, ESRB staff conducted field inspections of Sonic'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 December 8, 2026, via electronic copy of all corrective actions and preventive measures taken by Sonic 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 Joe Murphy at (415) 308-4159 or muj@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 Audit Findings of Sonic's San Francisco, San Mateo, and San Jose Regions

Cc: Koko Tomassian, Director, Safety and Enforcement Division (SED), CPUC
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SONIC SAN FRANCISCO, SAN MATEO, SAN JOSE REGIONS
COMMUNICATIONS AUDIT FINDINGS
AUGUST 31- SEPTEMBER 4, 2026

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Sonic's San Francisco, San Mateo, and San Jose Regions:

- Facility statistics for miles of overhead lines, miles of underground lines, number of poles, and number of underground structures.
- Service maps including Graphical Information System (GIS) data as of July 10, 2026.
- GO 95 and GO 128 maintenance/inspection program documents.
- GO 95 and GO 128 inspection records from June 1, 2021 through May 31, 2026.
- Work order list containing data on facility locations, identified deficiencies, and work completion dates from June 1, 2021 through May 31, 2026,
- Safety Hazard Notifications Sonic sent to Third Party Utilities from June 1, 2021 through May 31, 2026.
- Safety Hazard Notifications Sonic received from Third Party Utilities from June 1, 2021 through May 31, 2026.
- A sample of pole loading calculations as requested by ESRB.
- Intrusive pole test and treat inspection records from June 1, 2021 through May 31, 2026,
- New construction projects completed from June 1, 2025 through May 31, 2026.

II. Records Violations

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

1) **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.*
>
> *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."*

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"*

a) In response to ESRB's request for OH and UG maintenance and inspection policies, procedures, and program documentation, Sonic provided "Sonic Patrol Inspections and Detailed Inspections Mandatory Procedures and Guidelines" [1].

Sections 2 and 3 are titled "Patrol Inspections" and "Detailed Inspections" respectively.

ESRB notes the following regarding this document:

- The program provides no objective inspection criteria for overhead facilities.
- The program provides no guidance for establishing corrective action timelines or priorities.
- The program refers to checklists but provides none.
- The program does not identify requirements or processes for intrusive inspections.
- The program does not specify an inspection interval, either patrol or detailed inspections, for overhead facilities.

[1] Section 4-5 - Sonic Patrol and Detailed Inspections Guidelines *(sic)*, no revision or issue date.

- The program identifies work orders by customer address rather than by facility[2], not allowing audits of specific facility repairs.

ESRB is aware of Sonic efforts to create an inspection program [3] in 2027 [4], but as of this audit, the program in place does not meet General Order requirements for an "auditable" inspection program that is "frequent" and "thorough".

b) ESRB reviewed Sonic's Inspection records [5] and found that Issue entries included a "RULE 18 PRIORITY / TIER" value. There is no corrective action interval assigned in "Sonic Patrol Inspections and Detailed Inspections Mandatory Procedures and Guidelines" [6]. Additionally, there is no required due date or corrective action timeline listed in Sonic's Inspection Issues records or work orders.

   Sonic's priority assignments and required completion due dates must have corrective action intervals that meet GO 95 Rule 18 B (1) (a).

c) ESRB requested information on Sonic's inspector training program, and the qualifications of inspectors to perform inspections in compliance with GO 95. While Sonic provided the name of their contracted inspection firm, none of the documentation provided by Sonic addressed training requirements or inspector qualifications.[7]

   Therefore, Sonic is in violation of this requirement to document inspector qualifications.

2) GO 95, Rule 31.2, Inspection of Lines states in part:

"Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard."

GO 95, Rule 80.1, Inspection Requirements for Communication Lines states in part:

"A. Patrol and Detailed Inspections
(1) Inspection Requirements for Joint-Use Poles in High Fire-Threat District
In Tiers 2 and 3 of the High Fire-Threat District, the 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

[2] Sonic identifies facilities by location with a 32-character Sonic 3_GID_ID number.
[3] Audit of Sonic Communications – San Francisco, San Mateo, San Jose Service Areas, Post-Audit Follow Up Data Requests #1 & #2, Response to Question 1.
[4] Pre-Audit Follow Up Data Request #3, Response to Question 5.
[5] Section 6 - Patrol Inspections 2026
[6] Section 4-5 - Sonic Patrol and Detailed Inspections Guidlines *(sic)*, no revision or issue date.
[7] Preaudit data response: Section 5 - Cyient's training documentation

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*

Sonic has communication lines on approximately 240 joint use poles in HFTD Tier 2 areas from Belmont through Palomar Park.[8] Between June 1, 2021 and May 31, 2026, each pole in Tier 2 areas should have been patrolled at least twice. ESRB's review of Sonic's inspection data found no inspection of Sonic facilities in Tier 2 areas.[9] [10]

Sonic has not inspected these facilities at the prescribed interval.

3) **GO 95, Rule 80.1.A.(2) Statewide Inspections Requirements**, states in part:

"Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines… The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections."

Patrol inspections require a checklist that specifies problems that inspectors should identify. Sonic did not provide sufficient evidence that it has a checklist for patrol inspections. Sonic provided ESRB their former vendor's slide deck [11] used for contract inspection training; however, Sonic must also develop a checklist for its patrol inspections that inspectors can use to identify obvious structural problems and hazards.

Additionally, Sonic provided ESRB "Sonic Patrol Inspections and Detailed Inspections Mandatory Procedures and Guidelines" [12] which refers to checklists, but no checklist were provided. ESRB is aware of Sonic efforts to create an inspection program [13] in 2027 [14], but as of this audit, the program in place does not meet General Order requirements.

4) **GO 95, Rule 31.1, Design, Construction and Maintenance,** states in part

[8] Preaudit data response: Section 3 - San Mateo County Pole and Structure (KMZ file)
[9] Preaudit data response: Section 6 - Patrol Inspections 2026
[10] Section 6 - Patrol Inspections 2026 included inspections for 739 patrol and detailed inspections in HFTD Tier 2 and Tier 3 areas. ESRB's review found that 51 of these listed inspections were within the audited area. The 51 HFTD Tier 2 patrol inspections had no Sonic facilities at the noted locations. Field personnel stated that Sonic or its contractors may conduct inspections in anticipation of facility installations.
[11] Section 5 - Cyient's training documentation-Confidential
[12] Section 4-5 - Sonic Patrol and Detailed Inspections Guidlines *(sic)* 2025
[13] Audit of Sonic Communications – San Francisco, San Mateo, San Jose Service Areas, Post-Audit Follow Up Data Requests #1 & #2, Response to Question 1.
[14] Pre-Audit Follow Up Data Request #3, Response to Question 5.

"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 communication or supply lines and equipment."

GO 95, Rule 18-A1: Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

"Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities."

ESRB's review of Sonic's San Francisco, San Mateo, and San Jose work orders[15] from June 2021 through May 2026 found 219 work orders (20.2% of all work orders) Sonic completed after the Estimated Repair Date. Sonic's work order data does not include a Required Due Date based or Priority, so ESRB used Sonic's Estimated Repair Date to assess work order performance.

Table 1 lists the latest closed work orders.

Table 1: San Francisco, San Mateo, and San Jose Area Latest Work Orders

Workflow ID	Estimated Repair Date	Repaired At Date	Days Late*
1816583	5/12/2022	10/1/2025	1238
1926450	8/4/2022	9/30/2025	1153
1959982	8/4/2022	8/11/2025	1103
1984190	1/27/2022	9/25/2024	972
1954299	1/27/2022	9/20/2024	967

*As of May 31, 2026.

Additionally, ESRB found 21 work orders with no "Estimated Repair Date". ESRB could not assess the timeliness of these work orders. Of these 21 work orders, 16 have "Repaired At Dates", 5 do not have "Repaired At Dates".[16]

5) **GO 95, Rule 38, 12.2, Minimum Clearances 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."

[15] Section 7 - Repair Work Orders. Note: as the data did not contain latitude and longitude, and many of the addresses were incomplete, ESRB could not determine if any of work orders were outside the audited area. Reference ESRB's comments regarding Section 6 - Patrol Inspections 2026 above.
[16] Section 7 - Repair Work Orders.

Table 2 footnote (rr): Can be less than 12" for strand mounted terminals, splice cases and other equipment located 8" or more from centerline of pole but not less than 1" with mutual agreement between affected owners.

GO 95, Rule 92.1 B Conductors, Cables and Messengers, Clearance Between Cables and Messengers and Other Conductors, states in part:

"Communication Cables and Messengers:
Between communication cables attached to the surface of the pole 1 foot
EXCEPTION: The minimum vertical clearance of 12 inches (1 foot) may be reduced to not less than 1 inch by mutual agreement between affected owners…"

Certain clearance requirements may be reduced with mutual agreement by utilities. ESRB requested a copy of Sonic's agreement with other utilities. Sonic could not produce an agreement, citing their position as a pole tenant and not a pole owner.[17] ESRB notes that while Sonic may not own the poles they are attached to, they own and are responsible for their lines meeting the clearance requirements of GO 95.

6) **GO 128, Rule 12.2, Maintenance,** states in part

"Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules."

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."

GO 128, Rule 17.2, Inspection of Lines, states:

[17] CA2026-1465 Sonic SF SM SJ Post-Audit Data Requests 1 and 2_Sonic Response - 100526_Updated, Response to DR #2, Question 1.

"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. (See Rule 12.3)."

GO 128, Rule 22.3.B, Maintenance, states in part:

"Maintenance means the work done on any facility or element for the purpose of preserving its efficiency or physical condition in service."

In response to ESRB's request for OH and UG maintenance and inspection policies, procedures, and program documentation, Sonic provided "Sonic Patrol Inspections and Detailed Inspections Mandatory Procedures and Guidelines" [18]. The document has two mentions of GO128 Underground Inspections:

Section 1 Inspector training.

Inspectors must have received documented training within the last 12 months concerning patrol and detailed inspection procedures as they relate to GO95 Rule 80.1 and GO128 Rule 17.2.

Section 3 Detailed Inspections.

Inspectors must use a checklist while inspecting each underground system component for GO128 infractions and safety issues. This checklist can be provided to the inspector by the inspecting company, but must provide a clear basis for identifying any GO128 infractions and safety issues.

ESRB notes the following regarding this document:

- The program provides no objective inspection criteria for underground facilities.
- The program does not specify an inspection interval for underground facilities. [19]

ESRB is aware of Sonic efforts to create an inspection program [20] in 2027 [21], but as of this audit, the program in place does not meet General Order requirements for "frequent" and "thorough" inspections.

[18] Section 4-5 - Sonic Patrol and Detailed Inspections Guidlines *(sic)* 2025

[19] In response to the pre audit data request, Sonic provided "M&I Program_2024". In that document, Sonic states GO128 Underground Inspections are on a 20-year cadence. In Pre-Audit Follow Up Data Request #3, Sonic notes that "M&I Program_2024" is not part of the current Sonic documentation. Section 4-5 - Sonic Patrol and Detailed Inspections Guidlines (sic) 2025 has not inspection interval.

[20] Audit of Sonic Communications – San Francisco, San Mateo, San Jose Service Areas, Post-Audit Follow Up Data Requests #1 & #2, Response to Question 1.

[21] Pre-Audit Follow Up Data Request #3, Response to Question 5.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities listed in Table 2:

Table 2: Locations of Sonic Region Field Inspections

Loc #	Structure Type	3GIS ID	Lat	Long
1	Pole	{B2013545-CAB8-4DD4-BC80-6B629A23D3A2}	37.775517	-122.491877
2	Pole	{9E16FDD1-ACA2-46D7-835E-CFFC81DA107C}	37.775317	-122.491860
3	Pole	{FDEDB0B4-D7FE-455A-8F51-05DB0A41205D}	37.775167	-122.491852
4	Pole	{C28A1B04-ADA2-4D68-A50B-B8FCA60DD18B}	37.774830	-122.491827
5	Pole	{B14EC43E-EBD0-4A16-A2CB-A289237E1513}	37.785329	-122.478763
6	Pole	{0E7FE93F-B351-4DD2-90FD-0DBE53F07F25}	37.785661	-122.478791
7	Pole	{C743EDF5-8CAF-4E2F-9BEB-E67027055FD0}	37.785877	-122.478804
8	Pole	{4AE7BE86-1165-4516-90F1-38D0B20B4794}	37.786265	-122.471811
9	Pole	{CFF8252F-6739-4C33-9718-2666C9EDB15A	37.786291	-122.471370
10	Pole	{BFBB65F0-3596-4375-918C-A9016B224B25}	37.786309	-122.471033
11	Pole	{41AF8782-7AB9-464C-8C22-AED0F7430644}	37.786281	-122.471205
12	Pole	{71146AD2-C365-4D6E-9F72-776135454282}	37.756812	-122.438946
13	Pole	{919500D5-C4F0-4CC8-AED8-DE4B54C7C6F1}	37.756465	-122.438912
14	Pole	{A3EB6CA6-020C-4E11-AB1C-78C4B02D3CFD}	37.756193	-122.438885
15	Pole	{9C899283-CBCB-4A98-8A00-69758ABA5C9F}	37.755839	-122.438850
16	Pole	{2AE6045B-4046-4699-B1AB-22756F2AC615}	37.757080	-122.438965
17	Pole	{634F2AE3-E8A8-BCCA-AFCA-7BB665963422}	37.757363	-122.439000

Loc #	Structure Type	3GIS ID	Lat	Long
18	Pole	{639C0B8A-75F7-4ADF-B37C-1A3DDDA9FF26}	37.734504	-122.432455
19	Pole	{CBF4C7F4-AFF9-403A-ADA4-9AF2324A9563}	37.734491	-122.432752
20	Pole	{A9704298-E78D-46BC-B012-15B728EC7B72}	37.734562	-122.431934
21	Pole	{ED9DF165-B9BF-4249-90AD-F6DF5E5E3E3D}	37.470391	-122.162986
22	Pole	{3B3295BC-9C96-472F-B7CA-7536D578E47B}	37.470322	-122.162708
23	Pole	{BEA0819F-C06D-4FA4-BC08-9D9807396297}	37.470175	-122.162124
24	Pole	{E177F2C7-3255-4337-AC5F-705B9F69D249}	37.470054	-122.161670
25	Pole	{3B950279-81E9-4B91-B9E3-D4848339921A}	37.469919	-122.161218
26	Pole	{B211F299-D08F-4103-A28E-F10DE5943F2D}	37.470108	-122.160592
27	Pole	{C83C11FE-2C00-435C-A7B6-74ACC0C00CBC}	37.470390	-122.160450
28	Vault	{5E7AA5B7-543A-42E1-AAD0-A4E5DD5CF523}	37.467240	-122.271630
29	Vault	{EAC928FF-BC35-4181-B717-392E323B6F73}	37.467586	-122.271654
30	Pole	{25243064-7FAF-A015-83A9-04D178A3683D}	37.497445	-122.282006
31	Pole	{C72BC8DD-ECAF-9C93-6193-FFE2F9091143}	37.497208	-122.282310
32	Pole	{97AD617E-2BB5-483A-B13E-C54AAE8FBA9C}	37.496867	-122.282778
33	Pole	{DE27A22F-95F0-CC11-85F4-3FD40AB582F3}	37.496662	-122.283091
34	Pole	{D020BF8A-134F-861F-75A1-B52CE7C98D35}	37.496682	-122.283441
35	Pole	{90595A73-4170-C252-8BE7-51039675FE46}	37.497115	-122.285903
36	Pole	{650A2FD3-07F1-767D-6DB9-EF7B36A85F33}	37.497416	-122.285203
37	Pole	{AAE5CBC9-2FF8-310E-8ABB-524814EA49F6}	37.497763	-122.285365

Loc #	Structure Type	3GIS ID	Lat	Long
38	Pole	{0CE6F6A6-1D6D-30F2-99E9-00018D2E5B91}	37.508814	-122.318137
39	Pole	{54FB3920-8BB2-F014-683E-8A1B781878BD}	37.509130	-122.318216
40	Pole	{A8255C6D-01CC-6A05-5ED0-556A8EAA64DB}	37.509460	-122.318194
41	Pole	{46C21CD8-A88F-42B8-A7FB-511D0ACC7D32}	37.381332	-121.821451
42	Pole	{0EE62A3F-CB63-4B06-84A0-9EB63BF9F063}	37.381523	-121.822013
43	Pole	{9E341E9D-5DD5-4BBC-A4D4-1A0BFEADCB74}	37.381352	-121.821794
44	Pole	{C0B5FAF3-08E3-437C-99D2-9B38C84C03C3}	37.381794	-121.822133
45	Pole	{D0D86D4E-3C44-4CF8-8A2A-A862A9B8C48E}	37.381924	-121.822062
46	Pole	{E50AF32B-E119-4A7D-AE5D-57368610466D}	37.382365	-121.821835
47	Pole	{95BC6E09-B89B-4D9F-893B-123A9E825CEA}	37.383027	-121.821787
48	Pole	{59E0C7D9-040A-43C1-B786-42E479966B91}	37.367724	-121.807177
49	Pole	{B3156633-AD7B-44F6-BB34-CE1EDBB82BF1}	37.367459	-121.806613
50	Pole	{5123DEEA-DA0E-4B0D-B2EB-F13FC6AC0111}	37.367192	-121.806057
51	Pole	{B4384334-AB1F-4881-B1C9-70500EECF397}	37.366961	-121.805464
52	Pole	{952FBF6B-6059-2F83-20F4-4AEE683CAE87	37.353687	-121.851014
53	Pole	{4ACF5AD0-66D1-3AD7-1974-271A79DDA29B}	37.354160	-121.851392
54	Pole	{4ACCE1EA-7B71-4425-B655-42992197B481}	37.35316	-121.850631
55	Pole	{253A6D9C-BA84-4C44-BBEF-58F8F5F08FA1}	37.353265	-121.850091
56	Pole	{1FFB49CF-A3EB-4F7C-B084-6871F98EC76D}	37.352945	-121.850745
57	Pole	{84CEAC91-2080-4795-B4C7-81057B6C137C}	37.352845	-121.850399

Loc #	Structure Type	3GIS ID	Lat	Long
58	Pole	{23C74E10-5FD5-495E-8921-16B2621267EB}	37.333016	-121.919574
59	Pole	{F2439700-076C-4666-832F-B67A0CF3CAC6}	37.332751	-121.919937
60	Pole	{BC46F9B4-742A-4E82-8EFB-52A7D12BF9C0}	37.333029	-121.920303
61	Pole	{45BFEAC4-3430-4AB0-862B-5FBD9596EC11}	37.333251	-121.920594
62	Pole	{D8307A6C-5687-438A-BA2D-265B6D3B0B21}	37.333279	-121.919219
63	Pole	{5AF5DEEE-B7F6-4AC2-A70A-58F010018D14}	37.333559	-121.918832
64	Pole	{71E66626-6DF2-47E7-AB0E-A9DF2862AE01}	37.325717	-121.908094
65	Pole	{399C9674-943C-4388-88B6-B687B51E06B9}	37.325347	-121.908074
66	Pole	{7DB95915-212E-4219-993C-E07547DFFE52}	37.324875	-121.908041
67	Pole	{C5856345-2C4F-40DF-8F03-7F30369F48F0}	37.320115	-121.937430
68	Pole	{11C8E097-9149-4A58-AE8C-ED00A46BB213}	37.320576	-121.937433
69	Pole	{CA46FB53-73CD-456D-8EDA-5CE5DA728E65}	37.321020	-121.937436
70	Pole	{62934351-6FFA-437C-B3E6-B9FAC0F561A7}	37.321480	-121.937441
71	Pole	{034945AD-E097-C86D-B53A-AA5FEB16CFA5}	37.509804	-122.278852
72	Pole	{242C7418-57E9-6C83-EC8B-A1B3F800918D}	37.509728	-122.278305
73	Pole	{89EE5793-2B82-4C36-F3D1-DB8FEA97C18B}	37.510001	-122.277978
74	Pole	{FE87FAD1-FE0B-669C-DF06-5B1EA56AB535}	37.510194	-122.277737
75	Pole	{02AE1DC9-BF5F-F2E8-17EC-89643F6DEAA6}	37.509380	-122.278728
76	Pole	{AEC12264-A08E-AF19-947E-D7C4ED1A1A25}	37.523735	-122.301742
77	Pole	{0F2935F0-ED6F-6989-0EF4-B90492ED5B45}	37.523898	-122.301343

Loc #	Structure Type	3GIS ID	Lat	Long
78	Pole	{8794A810-C921-5F30-6DB5-E1CCAE00ADB3}	37.524058	-122.300950
79	Vault	{8D2BC6DD-FCD9-4EC6-B987-8474FB17FD53}	37.639686	-122.416027
80	Vault	{D64374D5-C9C0-428A-B51A-40FE4773E42F}	37.639297 [22]	-122.416569
81	Pole	{306F93E1-D4F2-D4A2-75F7-43949824FF0E}	37.639149	-122.416462
82	Pole	{EF768BB6-48B4-D91B-0AD3-9011EF6CB71B}	37.638800	-122.416254
83	Pole	{49C509CC-1A98-4B77-65A6-1D4A2F8CFC01}	37.639437	-122.416701
84	Vault	{57FAD214-7E1A-40D4-A998-66B874DEFFB1}	37.640512	-122.413729
85	Pole	{155F01AA-507B-5085-120C-BDB918909F0E}	37.640230	-122.413446
86	Pole	{2BD45C2E-BD0A-893D-FD06-1F482CB5F5CE}	37.639839	-122.413429
87	Vault	{0BA25AB0-8C2C-4D27-998E-FB82F375B00E	37.640376	-122.414107
88	Pole	{B037E988-752C-2CE1-1FB9-46EDC093BA7E}	37.658523	-122.418297
89	Pole	{6E020265-27EE-24D7-1297-93F25289EE37}	37.658632	-122.418800
90	Pole	{721ED7FD-E5CF-9E42-05F2-A1ED78A81BA8}	37.658751	-122.419332
91	Pole	{4D4A85FD-6E9A-9C29-DF51-B8844D87BB51}	37.658941	-122.418895
92	Pole	{04388BBB-C8AD-16C4-3005-3F716E65C02F}	37.659047	-122.430270
93	Pole	{3291C12A-9CC2-0DAB-C35D-CDA705AB0CCD}	37.659032	-122.430143
94	Pole	{3DB8F918-7761-1189-A79B-E544D2A15A3E}	37.658973	-122.429886
95	Pole	{C2D1DC87-8CA3-5DE3-5C23-10C09615EFF1}	37.658901	-122.429565
96	Pole	{39A7011D-16B7-A444-A5CE-C8C28F82F92C}	37.658759	-122.428907

[22] Field Location 80, Sonic KMZ file location for 3GIS ID {D64374D5-C9C0-428A-B51A-40FE4773E42F} is Lat: 37.639154, Long:-122.416474. Latitude and longitude listed are measured by ESRB during the field audit.

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 3:

Table 3: GO 95, Rule 31.1 Findings

Location	Findings	Notes
17	Loose nut	
19	Cable clamps not attached, service drop wrapped around pole	
30	Preform on line	
71	Broken lashing	

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 4:

Table 4: GO 95, Rule 31.6 Findings

Location	Findings	Notes
12	Facility transfer to new pole required	
42	Facility transfer to new pole required	

Location	Findings	Notes
55	Facility transfer to new pole required	
65	Facility transfer to new pole required	
85	Facility transfer to new pole required	

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

Table 5: GO 95, Rule 38 Findings

Location	Findings	Notes
1	Service drop clearance	
6	Drop clearance to ATT	
8	Sonic drop tied into Comcast's	
11	Service drop clearance	
37	Midspan clearance	
46	Strain abrasion	
54	Service drop to power clearance	
63	Clearance mid span	
65	Clearance to other drops	
71	Clearance between comms	
75	Mid span clearance, cover on Comcast	
76	Clearance between comms, bundled	
86	Midspan clearance	
90	Clearance to comm Midspan (needs snowshoes)	

Location	Findings	Notes
96	Drop clean up, clearance to comm	

4. **GO 95, Rule 56.4 A (1) (a) (2), Overhead Guys, Anchor Guys and Span Wires, Clearances, Above Ground, Over, Across or Along Public Thoroughfares** states:

   "(a) Guys over or across public thoroughfares in urban districts shall have a clearance of not less than 18 feet above ground (Table 1, Case 3, Column A).

   EXCEPTIONS:

   1) A clearance of not less than 16 feet is permitted for the portions of guys over that part of the public thoroughfares which is an entrance to or exit from industrial or commercial premises.
   2) A clearance of not less than 14 feet is permitted for the portions of guys over that part of the public thoroughfare which is an entrance to or exit from private residential premises"

   ESRB's finding related to the above rule is listed in Table 6:

Table 6: GO 95, Rule 56.4 A (1) (a) (2) Finding

Location	Finding	Notes
12	Clearance less than 8 ft at residential driveway	

5. **GO 95, Rule 84.6-D, Vertical and Lateral Conductors, Vertical Runs s**tates in part:

   "Vertical runs of communication wires or cables supported on the surface of wood poles or structures… shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches."

   ESRB's finding related to the above rule is listed in Table 7:

Table 7: GO 95, Rule 84.6-D Finding

Location	Finding	Notes
34	Unsecured riser, supports separated by more than 24"	

6. **GO 95, Rule 87.7-D (1) (b), 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:*
>
> *Non–metallic conduit or rigid U–shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8."*

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 findings related to the above rules are listed in Table 8:

Table 8: GO 95, Rule 87.7-D (1) (b) Findings

Location	Findings	Notes
7	Broken moulding	
34	Unprotected riser, fiber optic cable without protection [23]	SWO-93996 [24]

[23] Sonic's fiber optic cable was attached to the surface of the pole extending from ground level to the communications level. The fiber optic cable was not covered by flexible or rigid conduit, or rigid U-shaped moulding. Fiber optic cable may be used without additional covering if the outer cable cover meets GO 95, Rule 22.8 A (3). ESRB requested evidence that the fiber optic cable met specification sheets required by GO 95, Rule 22.8 A (3). Sonic's data request response CA2026-1465 Sonic SF SM SJ Post-Audit Data Requests 1 and 2_Sonic Response - 100526_Updated stated that Workflow SWO-93996 was created for Sonic to secure the drop line to the pole and to place the riser guard.

[24] Sonic created SWO-93996 to cover the riser per CA2026-1465 Sonic SF SM SJ Post-Audit Data Requests 1 and 2_Sonic Response - 100526_Updated Response 4.

7. **GO 95, Rule 84.8 C Service Drops, Clearances above Ground and Buildings** states in part:

> *"The vertical clearances shall not be less than the minimum clearances specified in Rule 37, Table 1, Column B, with the following modifications:*
> *(1) Above Public Thoroughfares: Vertical clearance shall not be less than 18 feet.*
>
> *EXCEPTION: Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line. In no case shall the clearance at the center line be less than 18 feet. Where there are no curbs, the foregoing provisions shall apply using the outer limits of normal longitudinal vehicular movement in lieu of a curb line"*

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

Table 9: GO 95, Rule 84.8 C Findings

Location	Findings	Notes
39	Service drop 12 ft over road edge	
55	Service drop 14 ft 6 inches over road edge	
58	Service drop 17 ft over center of road	
64	Service drop less than 16 ft at road edge, 2X	

8. **GO 95, Rule 87.4 C (3), Cables and Messengers, Clearances, Between Conductors and Cables, Attached to Poles** states in part:

> "*Cables or messengers where attached to the surface of poles which support supply conductors, shall not be less than 6 feet vertically below the level of supply conductors.*
> *EXCEPTION: This minimum clearance of 6 feet may be reduced to not less than 4 feet below supply conductors of 0 - 750 volts provided a guard arm is placed above the messenger and cable (or self–supporting cable)..."*

ESRB's finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 87.4 C (3) Finding

Location	Finding	Notes
88	4 ft. between communication and supply without guard arm	

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."*

ESRB's finding related to the above rule is listed in Table 11:

Table 11: GO 95, Rule 87.7 D (1) Finding

Location	Finding	Notes
7	Broken molding over riser	

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 12. Sonic created and sent third-party notifications to the respective utilities for the items below:

Table 12: Third-Party Observations

Location	Observations
1	Ground clearance (Telco)
2	Loose vertical line (Telco)
2	Low service drops over road (Cable)
3	Low drop, cable bracket pulled from building (Cable)
3	Clearance to communications lines (Telco)
4	Service drop pulled from building (Telco)

Location	Observations
5	Loose vertical run on pole (Telco)
6	Low drop over road (Telco)
8	Insufficient service drop clearance to comms (Telco)
8	Insufficient service drop clearance to power (Cable)
9	Low fire alarm clearance to ground, broken (Muni)
13	Missing riser cover (Telco)
15	Comm directly on cross arm, clearance to other comms (Cable)
16	Abandoned facility, pole (Telco)
17	Grounded down guy, contact above guy insulator (Supply)
18	Mule tape running between poles (Supply)
19	Unlashed cable, intermittent support (Cable)
19	Unauthorized 3rd party attachment, lights (Supply)
19	Loose splice box (Cable)
20	Slack down guy, loose anchor/concrete broken (Supply)
23	Comm drop contacting electrical (Cable)
23	Down guy clearance to comm, ground path (Supply)
24	Vegetation contact above down guy insulator (Supply)
24	Broken lashing below power (Cable)
27	Low service drop over road edge, 12 ft (Telco)
27	Low service drop over road edge, 13 ft (Cable)
30	Abandoned facility/pole, requires transfer (Cable)
30	Abandoned facility/pole, requires transfer (Telco)
31	Abandoned facility/pole, requires transfer (Telco)
35	Clearance to ground, abandoned service drop (Telco)
37	Low service drop over road, 14 ft (Telco)
37	Low service drop over road, 14 ft (Cable)

Location	Observations
39	Low service drop over road edge, 12 ft (Cable)
39	Low service drop over road edge, 15 ft (Supply)
40	Low service drop over road edge, 15 ft (Supply)
42	Abandoned facility, requires transfer (Telco)
43	Broken down guy (Telco)
44	Low service drop at 8 ft over driveway (Telco)
45	Clearance to ground, abandoned service drop (Cable)
46	Loose vertical run on pole (Cable)
48	Abandoned facility, requires transfer (Telco)
49	Abandoned facility/pole, requires transfer (Telco)
49	Insufficient service drop clearance to power (Telco)
49	Insufficient service drop clearance to power (Cable)
50	Low service drop over road, 14 ft (Telco)
51	Low down guy over driveway access from public road (Telco)
51	Low down guy over driveway access from public road (Cable)
52	Loose vertical run on pole (Cable)
52	Insufficient service drop clearance to comms (Telco)
52	Clearance to ground, abandoned service drop (Telco)
54	Loose vertical run on pole (Telco)
54	Low service drop over road, 14 ft (Telco)
54	Low service drop over road, 14 ft (Cable)
55	Abandoned facility, requires transfer (Telco)
55	Abandoned facility, requires transfer (Cable)
55	Low service drop over road edge, 14 ft (Cable)
58	Low service drop over road center, 16 ft (Cable)
60	Low service drop over road edge, 15 ft (Telco)

Location	Observations
60	Low service drop over road edge, 15 ft (Supply)
61	Low service drop over road edge, 14 ft (Cable)
61	Low service drop over road edge, 14 ft (Telco)
61	Low service drop over road edge, 14 ft (Supply)
63	Low service drop over road edge, 13 ft (Telco)
63	Low service drop over road edge, 15 ft (Cable)
64	Low service drop over road (Telco)
64	Low service drop over road (Cable)
65	Abandoned facility, requires transfer (Telco)
65	Abandoned facility, requires transfer (Cable)
65	Broken lashing below power (Cable)
66	Low service drop over road, 9 ft. (Telco)
67	Low service drop over road edge, 14 ft (Cable)
68	Service drop contacting other drops (Cable)
68	Insufficient service drop clearance to comms (Telco)
68	Low service drop over road edge, 13 ft. (Telco)
68	Low service drop over road edge, 13 ft. (Telco)
69	Low service drop over road, 12 ft. (Telco)
69	Low service drop over road, 12 ft. (Cable)
69	Low service drop over pedestrian area, 8 ft. (Cable) 430 Wainwright
70	Low service drop over road edge, 14 ft. (Telco)
70	Low service drop over road edge, 14 ft. (Cable)
71	Insufficient clearance to other comms over road, bundled (Telco)
71	Insufficient clearance to other comms over road, bundled (Cable)
77	Pole deterioration (Supply)
77	Low service drop over road edge, 14 ft. (Telco)

Location	Observations
78	Low service drop over road edge, 13 ft. (Cable)
82	Low service drop over driveway, 10 ft. (Telco) 1250 Huntington
82	Pole and extension deterioration (Supply)
85	Insufficient pole backfill, trip hazard (Supply)
88	150 ft open rack span without spreader (Supply)
88	Low service drop over road edge (Telco)
92	Low service drop over road edge, 14 ft. (Telco)
93	Broken lashing (Telco)
93	Cable attached to Sonic midspan, insufficient clearance. (Cable)
95	Clearance to ground, abandoned service drop (Telco)