PUBLIC UTILITIES COMMISSION
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May 6, 2022 CA2022-997

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SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T San Francisco and San Mateo Counties

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Charles Mee and Monica Hoskins of ESRB conducted a CIP audit of AT&T in San Francisco and San Mateo Counties from March 7 through 11, 2022. During the audit, ESRB staff reviewed pertinent documents and records and conducted field inspections of AT&T's communications facilities.

As a result of the audit, ESRB 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 June 3, 2022, by electronic copy of all corrective actions and preventive measures taken by AT&T to correct the identified violations outlined in Sections II & IV and observation in Section V of the enclosed Audit Report and prevent the recurrence of such violations. The response should indicate the date each corrective action and preventive measure completed. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations and observation outlined in the report.

If you have any questions concerning this audit, please contact Charles Mee at (415) 730-7012 or charles.mee@cpuc.ca.gov.

Sincerely,

Banu Acimis, 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- San Francisco and San Mateo Counties

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
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CPUC AUDIT FINDINGS OF AT&T

SAN FRANCISCO AND SAN MATEO COUNTIES

I. Records Review

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

- Visual Inspections of Overhead Lines
- Intrusive Inspections of Wood Poles
- Overhead Lines Maintenance Plan
- San Francisco County Fire Tier Map
- San Mateo County Fire Tier Map
- San Francisco and San Mateo Counties Statistics
- General Order (GO) 95 Inspection Data
- San Francisco and San Mateo Counties Work Orders
- Safety Hazards Notifications AT&T Received from and Sent to Third Parties
- San Francisco and San Mateo Counties Pole Loading Analysis Projects List
- AT&T's Pole Loading Analysis and Safety Factor Calculation Samples

II. Records Violations

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

1. **General Order (GO) 95, Rule 18-B(1)(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 definition of nonconformance priority levels are based on General Order 95, Rule 18:

- **Level 1** nonconformances pose an immediate risk of high potential impact to safety or reliability. **Within 72 hours**, Level 1 nonconformances shall be corrected or temporarily remediated and reclassified to a lower priority level.
- **Level 2** nonconformances pose any other risk of at least moderate potential impact to safety or reliability. Corrective action for Level 2 nonconformances shall be based on individual circumstances and exceptions noted below, but **not to exceed 36 months**.
- **Level 2a** nonconformances are those Level 2 nonconformances that may compromise **worker safety**. Level 2a nonconformances must be corrected or temporarily remediated and reclassified to a lower priority level **within 12 months**.
- **Level 2b** nonconformances are those Level 2 nonconformances that may create a **fire risk** in **Fire Map Tier 2.** Level 2b nonconformances must be corrected or temporarily remediated and reclassified to a lower priority level **within12 months.**
- **Level 2c** nonconformances are those Level 2 nonconformances that may create a **fire risk** in **Fire Map Tier 3.** Level 2c nonconformances must be corrected or temporarily remediated and reclassified to a lower priority level **within 6 months.**
- **Level 3** nonconformances pose a risk of low potential impact to safety or reliability. Level 3 nonconformances must be corrected **within 60 months**.

ESRB's review of AT&T's work orders from January 1, 2017 through December 31, 2021 found that AT&T had a total of 101 late work orders, including 98 late-closed work orders and 3 late-pending work orders in San Francisco County. ESRB also found that AT&T had a total of 591 late work orders, including 508 late-closed work orders and 83 late-pending work orders in San Mateo County.

Table 1 below lists the late work orders in San Francisco County by different hazard levels.

Table 1: Late Work Orders in San Francisco County

Hazard Level	Late-Closed Work Orders	Late-Pending Work Orders	Total
1	45	2	**47**
2	-	-	**-**
2a	5	-	**5**
2b	2	-	**2**
2c	46	1	**47**
3	-	-	**-**
Total	**98**	**3**	**101**

Table 2 below lists the late work orders in San Mateo County by different hazard levels.

Table 2: Late Work Orders in San Mateo County

Hazard Level	Late-Closed Work Orders	Late-Pending Work Orders	Total
1	115	8	**123**
2	-	-	**-**
2a	61	10	**71**
2b	294	41	**335**
2c	38	24	**62**
3	-	-	**-**
Total	**508**	**83**	**591**

Late-closed work orders are those completed past their assigned due dates based on their hazard levels, and late-pending work orders are those had not been completed, as of March 7, 2022, by their assigned due dates based on their hazard levels.

III. Field Inspection

During the field inspection from March 7 through 11, 2022, ESRB staff inspected AT&T's communications facilities in the locations listed in Table 3:

Table 3: Field Inspection Locations

Location	City	Address	Structure Type	Structure #
1	Daly City	18 Beplar Street	Pole	
2	Daly City	Beplar Street	Pole	110047703
3	Daly City	Beplar Street	Pole	110047704
4	South S.F.	Dundee Drive	Pole	110064045
5	South S.F.	Dundee Drive	Pole	110064017
6	South S.F.	Dundee Drive	Pole	110064016
7	San Bruno	Chabot Drive	Pole & Span	The pole is across from Monte Verde Park at the back of 2609 Evergreen Drive
8	Millbrae	Millbrae Avenue	Pole	110058175
9	Millbrae	Millbrae Avenue	Pole	120781755
10	Millbrae	Millbrae Avenue	Pole	110199567
11	San Francisco	3450 Sacramento St.	Pole	
12	San Francisco	3524 Geary Blvd	UG Box	
13	San Francisco	3524 Geary Blvd	UG Box	
14	San Francisco	3540 Geary Blvd	UG Box	
15	San Francisco	3555 Geary Blvd	UG Box	
16	San Francisco	2824 Golden Gate Ave	Pole	
17	San Francisco	Golden Gate Ave	Pole	
18	San Francisco	Golden Gate Ave	Pole	110047259
19	San Francisco	24th Ave	Pole	110050002
20	San Francisco	Irving Street	Pole	814860
21	San Francisco	Irving Street	Pole	110044953
22	San Francisco	Irving Street	Pole	11004950
23	San Francisco	Irving Street	Pole	110044949
24	San Francisco	1555 8th Ave	Pole	110027987
25	San Francisco	8th Ave	Pole	110027986
26	San Francisco	8th Ave	Pole	110027988
27	San Francisco	1616 16th Ave	Pole	

Location	City	Address	Structure Type	Structure #
28	San Francisco	16th Ave	Pole	120250751
29	San Francisco	16th Ave	Pole	110046097
30	San Francisco	16th Ave	Pole	110046096
31	San Francisco	16th Ave	Pole	110050123
32	San Francisco	16th Ave	Pole	110046094
33	San Francisco	30th Ave	Pole	110287972
34	San Mateo	Darcy Ave	Pole	110480430
35	San Mateo	124 Darcy Ave	Pole	
36	San Mateo	3917 Donner Street	Pole	Darcy Ave
37	San Mateo	3920 Donner Street	Pole	Darcy Ave
38	San Mateo	15 Darcy Ct.	Pole	
39	San Mateo	3916 Colegrove Street		Darcy Ave
40	San Mateo	3938 Colegrove St	Pole	Darcy Ave
41	Belmont	Notre Dame Ave	Pole	110080523
42	Belmont	Notre Dame Ave	Pole	110080525
43	Belmont	Notre Dame Ave	Pole	110080522
44	Belmont	Notre Dame Ave	Pole	110080521
45	San Carlos	Beverly Drive	Pole	121078245
46	San Carlos	111 Windsor Drive	Service Drop	
47	San Carlos	111 Windsor Drive	Pole	110080209
48	San Carlos	111 Windsor Drive	Pole	110080208
49	San Carlos	313 Windsor Drive	Pole	110080156
50	San Carlos	Maple Way	Pole	120780248
51	Redwood City	3000 Hopkins Ave	Pole	
52	Redwood City	3037 Hopkins Ave	Pole	
53	Redwood City	2945 Hopkins Ave	Pole	
54	Redwood City	2244 Roosevelt Ave	Pole	
55	Menlo Park	Orange Ave	Pole	121135840
56	Menlo Park	1270 Orange Ave	Pole	
57	Menlo Park	1199 Orange Ave	Pole	
58	Atherton	Camino Por Los Arboles	Pole	120855874
59	Atherton	Camino Por Los Arboles	Pole	120971566
60	La Honda	500 Log Cabin Ranch Road	Pole	
61	La Honda	501 Log Cabin Ranch Road	Pole	
62	La Honda	Log Cabin Ranch Road	Pole	37°18’21’’N, 122°15’26’’W

Location	City	Address	Structure Type	Structure #
63	La Honda	Log Cabin Ranch Road	Pole	37°18’22’’N, 122°15’28’’W
64	La Honda	Log Cabin Ranch Road	Pole	37°18’24’’N, 122°15’22’’W
65	La Honda	Log Cabin Ranch Road	Pole	37°18’24’’N, 122°15’31’’W
66	La Honda	14251 Pescadero Creek Road	Service Drop	
67	La Honda	14251 Pescadero Creek Road	Pole	37°18’8’’N, 122°16’1’’W
68	La Honda	13750 Pescadero Creek Road	Pole	Across from
69	La Honda	13755 Pescadero Creek Road	Pole	01400
70	La Honda	13755 Pescadero Creek Road	Pole	Along
71	La Honda	13755 Pescadero Creek Road	Pole	Along
72	Loma Mar	9923 Pescadero Creek Road	Pole	Private Ranch
73	Loma Mar	9923 Pescadero Creek Road	Pole	Private Ranch
74	Loma Mar	9923 Pescadero Creek Road	Pole	Private Ranch
75	Pescadero	4290 Pescadero Creek Road	Pole	
76	Pescadero	4290 Pescadero Creek Road	Pole	
77	San Gregorio	7400 Stage Road	Pole	
78	San Gregorio	300 ft north of 7400 Stage Road on east side	Pole	
79	San Gregorio	7400 Stage Road	Pole	37°19’15’’N, 122°23’16"W
80	San Gregorio	6767 Stage Road	Pole	
81	San Gregorio	2760 La Honda Road	Pole	
82	San Gregorio	2760 La Honda Road	Pole	West side of road, 200 ft south of Bear Gultch Road

Location	City	Address	Structure Type	Structure #
83	San Gregorio	2760 La Honda Road	Pole	East side of highway 84, about 200ft south of Bear Gultch Rd.
84	San Gregorio	2760 La Honda Road	Pole	East side of highway 84, more than 200ft south of Bear Gultch Rd.
85	Portola	342 Willowbrook Drive	UG Box	
86	Portola	Willowbrook Drive	Pole	120147599
87	Portola	333 Willowbrook Drive	Pole	
88	Half Moon Bay	Cabrillo Highway North	Pole & Span	120097653
89	Half Moon Bay	3361 Cabrillo Highway North	Pole	1 pole north of 120097653
90	Half Moon Bay	3361 Cabrillo Highway North	Pole	2 pole north of 120097653
91	Half Moon Bay	3361 Cabrillo Highway North	Pole	3 pole north of 120097653
92	Half Moon Bay	900 Palma Street	UG Box	
93	Half Moon Bay	Palma Street	UG Box	
94	Half Moon Bay	Palma Street	UG Box	
95	Half Moon Bay	522 Cabrillo Avenue	Pole	Palma Street
96	Half Moon Bay	522 Cabrillo Avenue	UG Box	Palma Street
97	Half Moon Bay	523 Cabrillo Avenue	Pole	Palma Street
98	Half Moon Bay	Palma Street	Pole	
99	Half Moon Bay	Palma Street	Pole	
100	Half Moon Bay	331 San Juan Avenue	Pole	110366432
101	Half Moon Bay	363 San Juan Avenue	Pole	
102	Half Moon Bay	300 San Juan Avenue	Pole	Sterling Ranch
103	Montara	771 Riviera Street	Pole	771 Riviera Road

Location	City	Address	Structure Type	Structure #
104	Pacifica	812 Oddstad Blvd	Pole	
105	Pacifica	293 Hillside Drive	Pole	110054028
106	Pacifica	290 Lauren Ave	Pole	Hillside Drive
107	Pacifica	276 Lauren Ave	Pole	Hillside Drive

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 are listed in Table 4:

Table 4: GO 95, Rule 31.1 Findings

Location	Findings	Notes
20	1. Unsecured clips need to be attached or removed, 2. Unsecured power guy wire.	SED staff Verified pole loading calculation data input.
22	1. Unsecured U clamp around riser, 2. Hanging cable splice case.	
28	Terminal needs to be secured.	
33	Lashing wire is broken.	AT&T has an open ticket for the broken lashing wire.
44	Abandoned fiber drop needs to be removed.	
47	One clamp on the terminal box is unsecured.	
50	Facilities need to be transferred.	AT&T has an open ticket for this facility transfer.
55	Pole needs to be replaced.	AT&T issued a 3rd party notice to PG&E for replacing the pole.
69	AT&T facilities need to be transferred to the new pole, and the old pole needs to be removed.	
73	The pole is leaning.	
78	The pole is leaning.	

Location	Findings	Notes
86	AT&T box needs to be secured onto pole.	
88	Lashing wire is broken, about 100 ft south of turn off at 3361 Cabrillo Highway.	
90	Pipe/cable is hanging off the pole, needs to be secured.	
91	Lashing wire is broken.	
100	Facility transfer at the pole is incomplete.	
103	Facilities have been transferred, so the abandoned pole needs to be removed.	AT&T has an open ticket.

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 are listed in Table 5:

Table 5: GO 95, Rule 31.6 Findings

Location	Findings
53	Abandoned drop needs to be removed.
105	Abandoned drop needs to be removed.

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

"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 are listed in Table 6:

Table 6: GO 95, Rule 35 Findings

Location	Findings	Notes
44	The vegetation has strain on the AT&T service drop.	
49	The vegetation has strain on the AT&T communications line.	AT&T has an open vegetation management ticket.
54	The vegetation has strain on the AT&T service drop.	AT&T has an open vegetation management ticket, saying climbing space is being impeded.
62	The vegetation has strain on the AT&T communications line.	
64	The vegetation has strain on the AT&T cable, the strain is about 35 yards off road over a creek.	AT&T has an open vegetation management ticket.
68	A fallen tree caused strain on the AT&T cable.	
75	A tree causes strain on the AT&T cable and guy wire.	
105	A tree caused strain on both the AT&T guy wire and the PG&E guy wire.	

4. **GO 95, Rule 37, Table 1** requires that:

> **Case No 3, Column B:** Vertical clearance of communication cables crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts must be at least 18 feet.
>
> **Case No. 3, Column B:** Vertical clearance of communication conductors above ground in areas accessible to pedestrians only must be at least 10 feet.

GO 95, Rule 38, Table 2 requires that:

> **Case No. 3, Column C:** The clearance between communication conductors must be at least 24 inches.
>
> **Case No. 3, Column F:** The clearance between communication conductors and power supply conductors with voltage of 7,500-20,000 V, must be at least 72 inches.
>
> **Case No. 3, Column G:** The clearance between communication conductors and power supply conductors with voltage of 20,000-35,000 V, must be at least 96 inches.

ESRB's findings are listed in Table 7:

Table 7: GO 95, Rule 37 and Rule 38 Findings

Location	Findings	Notes
4	AT&T service drops zip tied with Comcast service drops.	
7	Midspan hanging too low above the public road (measured at 13'11") that need to be corrected immediately.	
27	Service drop hanging too low above the ground.	AT&T has an open ticket for this issue.
49	Clearance between communication line and power line is not enough.	
52	Clearance between AT&T wires and Cable TV wires is less than 24 inches.	
58	AT&T lines hanging low, measured at 10'3" above the ground.	AT&T has an open ticket.
65	AT&T cable is low, measured at 13'3" above the ground.	
66	AT&T cable is low, measured at 9'8" above the ground.	
67	AT&T main line is low, measured at 5'6" above the ground.	

5. **GO 95, Rule 80.1-A(4) Record Keeping** states:

> *"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. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a).”

ESRB’s findings are listed in Table 8:

Table 8: GO 95, Rule 80.1-A(4) Findings

Location	Findings
4	Did not see the open splice case as described in AT&T's open ticket.
7	Did not see the broken lashing wire as described in AT&T's open ticket.
19	The open ticket for vegetation on climbing steps is no longer applicable
28	Did not see the open ticket for the old pole section attached to the new pole.
34	1. The terminal reattachment issue has been resolved but the ticket was still open. 2. There is a duplicate ticket in AT&T's database.
46	Did not see the vegetation causing strain on cable as described in an open ticket.
51	AT&T completed the service drop removal, but the ticket was still open.
75	Did not see the low cable as described in the open ticket.
88	Did not identify any hardware issues as described in the open ticket.
92	AT&T's open ticket says the broken underground box is at 855 Palma Street, but the box is at 900 Palma Street.
100	AT&T's open ticket has the wrong address for the pole transfer.

6. GO 95, Rule 86.2, Guys, 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.”

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 are listed in Table 9:

Table 9: GO 95, Rule 86.2 and Rule 86.9 Findings

Location #	Findings
30	Missing substantial guy marker
33	Service drops are impacted by two guy-wires.
34	AT&T guy-wire is loose.
63	AT&T guy-wire is loose.
75	A tree is pushing the guy-wire.
79	Guy marker needs to be resecured, and the extra wires trimmed.
83	AT&T guy wire is loose.
105	A tree caused strain on both AT&T guy wire and PG&E guy wire.

7. **GO 95, Rule 87.7-D(1), 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 findings are listed in Table 10:

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

Location	Findings	Notes
21	AT&T molding is broken.	Verified pole loading calculation data input.
42	The service drop does not have molding.	Verified pole loading calculation data input.
45	The service drop does not have molding.	
52	The service drop does not have molding.	
86	The service drop does not have molding.	

8. GO 95, Rule 91.3-B, Location of Steps states in part:

"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."

ESRB's finding is listed in Table 11:

Table 11: GO 95, Rule 91.3-B Finding

Location	Findings	Notes
41	The lowest step is 7'3" above the ground.	Verified pole loading calculation data input.

9. 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 are listed in Table 12:

Table 12: GO 128, Rule 17.1 Findings

Location #	Findings
12	Loose nut (tripping hazard) and graffiti on the manhole cover.
13	Loose nut (tripping hazard) and graffiti on the manhole cover.
92	Broken underground box, needs replacement.

V. Observations

1. **GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards** states in part:

(2) "Where a communications company's or an electric utility's (Company A's) actions result in potential violations of GO 95 for another entity (Company B), that entity's (Company B's) remedial action will be to transmit a single documented notice of identified potential violations to the communications

company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

(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 GO95.

ESRB's observations are listed in Table 13:

Table 13: Observations

Location	Observations	Recommendations
1	Guy wires for 3rd parties not grounded	AT&T needs to issue 3rd party notifications to Comcast and Extenet.
20	Unsecured power guy wire	AT&T needs to issue a 3rd party notification to PG&E.
34	Loose power guy wire	AT&T needs to issue a 3rd party notification to PG&E.
37	Lack of clearance between communication drops	AT&T needs to issue a 3rd Party notification.
43	Power line caused clearance issue	AT&T needs to issue a 3rd party notice to PG&E.
49	Excessive vegetation and damages on power guy wire	AT&T needs to issue a 3rd party notification.

Location	Observations	Recommendations
52	Pole is leaning	AT&T needs to issue a 3rd party notification to PG&E.
63	Vegetation on power guy wire above the insulator	AT&T needs to issue a 3rd party notification.
68	Loose power guy wire	AT&T needs to issue a 3rd party notification.
76	Curved pole caused by the over-tension of the power guy wire	AT&T needs to issue a 3rd party notification.
86	Abandoned service drop cable	AT&T needs to issue a 3rd party notification.
87	Abandoned cables/air pipes	AT&T needs to issue a 3rd party notification.
105	Vegetation touching the upper part of power guy wire	AT&T needs to issue a 3rd party notification.

2. ESRB reviewed AT&T's documents and records and found that AT&T does not have documents describing a training program and does not have training and qualification records for its employees who perform tasks such as patrolling and inspecting AT&T's facilities and correcting deficiencies identified during the inspection. ESRB recommends AT&T to establish a training program and to maintain training records for its employees. Maintaining training records is necessary to demonstrate that AT&T's employees are properly trained and qualified to perform the assigned tasks.