



August 28, 2023

**Via Electronic Mail**

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

**Re: Audit of Verizon Communications' (Verizon) San Diego County Area**

Dear Mr. Daye:

This responds to the staff's Audit Report of Verizon facilities in San Diego County. As discussed below, we are working on remediating deviations found as to Verizon's facilities, have fixed signage issues, and issued a third party notice to SDG&E regarding its down guy wire.

Further details are set forth below.

**I. Records Review – Violations List**

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.

**GO (General Order) 95, Rule 18-A: Resolution of Safety Hazards and General Order 95 Nonconformances, 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.



According to Verizon's inspection record titled "2021 - Tier 2 - VzB COPs 12-27-21", Verizon completed 17 work orders past Verizon's scheduled due date for corrective action.

**Verizon Response:** These work orders were primarily for issues related to facilities in Camp Pendleton, which required scheduled access and badging. While our vendor was able to partially complete the work by May 25, the crew foreman tested positive for Covid and the crew was off from 5/26/22 to 6/19/22. Thus, the vast majority of these orders were missed during that timeframe. We have reminded the vendor of the importance of meeting the remediation timeframes and will be requesting that the vendor report to us on the progress of remediations.

## II. Field Inspection – Violations List

My staff observed the following violations during the field inspection portion of the audit:

### **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.

Verizon facilities attached to the pole located at 5430 Clairemont Mesa Blvd., San Diego, are still attached to the "old pole" and have not been transferred to the newly installed pole yet.

Risers attached to each of the following poles were damaged:

- Z90074
- P322438
- P127002

**Verizon Response:** Verizon is in the process of issuing purchase orders to have vendors remediate these issues; as these damaged vertical ground risers are designated as priority 2b, Verizon is targeting remediation of these items by early next year.



**GO 95, Rule 94.4, Clearances, Case B, states:**

Antennas and supporting elements below communication lines shall maintain a 2 ft. vertical separation from communication conductors and equipment. (See Figure 94-1)

Antenna signage (which is considered supporting elements) attached on each of the following poles had less than 2 feet vertical separation from communication conductors and equipment.

- P80420-
- P282742

**Verizon Response:** Verizon notes that Rule 94.4 pertains to antenna and supporting element clearance, and is not applicable to signage and therefore, is not the correct rule at issue. Rule 94.5 requires signs to be marked in a certain manner (specifically in accordance with Appendix H and Exhibit A, which requires the signage placed at least 3 ft below the Antenna), and Verizon has resolved the signage issue.

**GO 95, Rule 38, Table 2, Case 19, Column D** requires the minimum radial separation between secondary conductors of 0-750 Volts (including service drops) and guy wires attached to the same pole to be 3 inches.

An SDG&E secondary conductor attached to pole number P80420 was touching a Verizon down guy wire attached to the same pole.

**Verizon Response:** This is a SDG&E down guy wire and Verizon has sent a third party notice to SDG&E. See attached.

Sincerely,

*/s/ Jane Whang*

Jane Whang