



Ross Johnson
Director

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March 15, 2024

Dear Mr. Daye,

Subject: Audit of AT&T Los Angeles Construction Avalon Area

The following is AT&T California's ("AT&T") response to your letter dated January 23, 2024 ("January Letter") regarding the Communication Infrastructure Provider Audit of AT&T Los Angeles Construction Avalon Area ("Avalon Audit") from November 13, 2023 to November 15, 2023.

The January Letter requested that we advise you of actions taken by AT&T to address conditions identified during the Safety and Enforcement Division's ("SED's") Avalon Audit and requested a response by February 23, 2024. On February 21, 2024, Eric Ujiiye on your staff agreed via email to an extension to March 15, 2024, for the response. This response is submitted timely.

I am enclosing AT&T's Response to the Avalon Audit.

Regards,

A handwritten signature in black ink that reads "R. Johnson".

Ross Johnson
Director
AT&T Regulatory
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Enclosure:

AT&T's Response to the Avalon Audit

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, ESRB, SED, CPUC

AT&T'S RESPONSE TO THE AVALON AUDIT

I. Records Review – Alleged Violations

Records Review Alleged Violation #1: From 2017 to 2023, AT&T completed 11 detailed inspections and 22 patrol inspections in a Tier 3 High Fire Threat Area after AT&T's required due dates.

AT&T Response: Without admitting that AT&T violated GO 95, Rule 31.2 or GO 95, Rule 80.1-A.2, 11 detailed inspections and 22 patrol inspections were completed beyond the assigned due date. While AT&T consistently aims to finish its inspections on or prior to the assigned due dates, a multitude of variables can interfere with the timely execution of these inspections, such as weather conditions, access limitations, and challenges related to permits or environmental considerations, to name a few.

Records Review Alleged Violation #2: From 2017 to 2023, AT&T failed to complete 5 work orders by AT&T's scheduled due date for corrective action.

AT&T Response: Without admitting that AT&T violated GO 95, Rule 31.1 or GO 95, Rule 18, five work orders were closed beyond the assigned due date. While the records may have indicated that a work order was closed on a certain date, that does not necessarily indicate that any related corrective action had not been completed by the assigned due date. Closing repair tickets is a time-consuming manual process.

II. Field Inspection – Alleged Violations

Field Inspection Alleged Violation #1: Safety hazards on the following poles were not documented and reported to the responsible third parties during AT&T's latest inspections:

- Pole 2365064E: an SCE supply service drop, passing above an AT&T span conductor, had a clearance of 12 inches from the AT&T conductor, which is less than the minimum required clearance of 48 inches.
- Pole 2381633E: an SCE supply service drop, passing beneath an AT&T span conductor, had a clearance of 12 inches from the AT&T conductor, which is less than the minimum required clearance of 48 inches.

AT&T Response: At this time, AT&T disagrees that these alleged conditions create a safety hazard as defined in GO 95, Rule 18.¹ Nevertheless, AT&T has notified SCE of these alleged conditions and documented these notices in AT&T's Rehab Work Management System ("RWM System") in response to the January Letter.

Field Inspection Alleged Violation #2: An AT&T conductor attached to Pole number X10251E is not properly secured onto the messenger wire due to damaged attachment straps.

AT&T Response: The alleged condition was entered into AT&T's RWM System, which assigned a due date of 1/24/2029.² It has been addressed in the field, and the work package was closed on 2/16/2024.

¹ See GO 95, Rule 18 - Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards (providing "For purposes of this rule, 'Safety Hazard' means a condition that poses a significant threat to human life or property.").

² Throughout AT&T's response, the noted "due" dates are based on entries made in AT&T's RWM System, which calculates and assigns the due date pursuant to GO 95, Rule 18B(1)(a).

Field Inspection Alleged Violation #3: The following AT&T facilities were permanently abandoned and should be removed:

- Pole 2166718E: an abandoned service drop that was bundled and attached to a chain link fence near the base of the pole.
- Pole 2365060E: there were two abandoned service drops attached at mid-span.
- Pole 2365063E: there was one abandoned service drop attached at mid-span.
- Pole 2381633E: an abandoned service drop that was bundled and attached to a pole step.

AT&T Response: The alleged conditions were entered into AT&T's RWM System and have already been addressed. More specifically:

- Pole 2166718E: Due on 1/26/2027. It has been addressed in the field, and the work package was closed on 2/28/2024.
- Pole 2365060E: Due on 1/26/2029. It has been addressed in the field, and the work package was closed on 2/28/2024.
- Pole 2365063E: Due on 1/29/2029. It has been addressed in the field, and the work package was closed on 2/28/2024.
- Pole 2381633E: Due on 1/26/2029. It has been addressed in the field, and the work package was closed on 2/28/2024.

Field Inspection Alleged Violation #4: The following AT&T facilities had less than 12 inches of vertical clearance from a communications conductor supported on the same pole:

- Pole 4926590E: an AT&T service drop was attached to a third-party communications service drop near the home located on the property.
- Pole 4926591E: near the pole, an AT&T conductor was touching multiple third-party communications conductors.
- Pole 1491857E: an AT&T conductor was attached at the same level and touching a third-party communications conductor.
- Pole 1492387E: an AT&T conductor, supported on a crossarm, was touching a third-party communications conductor supported on the same crossarm.
- Pole 1492874E: an AT&T service drop was touching a third-party communications service drop.
- Pole X10805E: two AT&T service drops were attached to an overbuilt third-party communications conductor.

AT&T Response: The alleged conditions were entered into AT&T's RWM System. They will be addressed if needed, or have already been addressed, by the assigned due date:

- Pole 4926590E: Due on 1/26/2029. AT&T was unable to locate this alleged condition in the field, and the work package was closed on 2/28/2024.
- Pole 4926591E: Due on 2/02/2027. It has been addressed in the field, and the work package was closed on 2/16/2024.
- Pole 1491857E: Due on 2/26/2027.

- Pole 1492387E: Due on 1/24/2027. It has been addressed in the field, and the work package was closed on 2/16/2024.
- Pole 1492874E: Due 1/26/2027. It has been addressed in the field, and the work package was closed on 2/28/2024.
- Pole X10805E: Due on 1/26/2029. It has been addressed in the field, and the work package was closed on 2/28/2024.

Field Inspection Alleged Violation #5: An AT&T service drop, attached to Pole number 4926590E, was touching a supply service drop weather head and had less than 12 inches of radial clearance from the supply service drop.

AT&T Response: The alleged condition was entered into AT&T's RWM System, which assigned a due date of 1/26/2027. It has been addressed in the field, and the work package was closed on 2/28/2024.

Field Inspection Alleged Violation #6: An AT&T conduit riser installed on the surface of Pole number 1492390E was not secured, (attached at the communication level with one bracket at the top of the riser).

AT&T Response: The alleged condition was entered into AT&T's RWM System, which assigned a due date of 1/24/2029. It has been addressed in the field, and the work package was closed on 2/16/2024.