



October 30, 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 Bernardino County Area

Dear Mr. Daye:

This responds to the staff's Audit Report of Verizon facilities in San Bernardino County. As discussed below, we are working on remediating deviations found as to Verizon's facilities, and issued third party notices where it was appropriate.

Further details are set forth below.

II. Records Review – Violations List

GO 95, Rule 18, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...

GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:

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.



Verizon's records indicated that from June 2022 to June 2023, Verizon had 7 open overhead work orders that were past Verizon's scheduled due date for corrective action.

Verizon Response: Verizon has reminded its vendor of the importance of meeting the time periods for correcting deviations per priority level. Verizon has five work orders that were past its scheduled due date for corrective action. The remaining 2 are estimated to be completed by 11-17-23. The delays have been due to contractor scheduling issues, among other things.

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections 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's facilities on the following poles required maintenance:

- Pole HT280Y – damaged pole
- Pole 4389856E - the "eye" of the Verizon down guy anchor attached the pole was buried.
- Pole 4923425E - the Verizon communication span was attached to a third-party communication conductor via a rope.

Verizon Response: Verizon has issued third party notice to Frontier for Pole HT280Y. Verizon has issued purchase orders to remediate the other poles.

A Verizon lashing wire on the following poles was broken:

- 4328712E
- 4168386E
- 4428301E
- 4389855E
- 4923425E

Verizon Response: Verizon remediated the lashing wires for all the poles as of September 18, 2023, except for pole 4923425E. This pole is located in Tier 1 and we are working to remediate it soon.



A Verizon communication conductor on each of the following poles was in contact mid-span with a street light and needs a box guard:

- 4439592E
- 4100204E
- 1377686E

Verizon Response: Verizon has issued purchase orders to remediate these deviations.

GO 95, Rule 54.6-B, Ground Wires, states in part:

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground moulding attached to each of the following poles was damaged:

- 4428301E
- 817890H

Verizon Response: Verizon has issued purchase orders to remediate these deviations.

General Order 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be 3 inches.

The radial clearance between an SCE down guy wire and a Verizon communication conductor on Pole 4558560E was less than 3 inches.

Verizon Response: A purchase order has been issued to correct this issue.

GO 95, Rule 34, Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight 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.



Unauthorized foreign attachments were observed on the following poles:

- Pole 835295H had an unauthorized “No Parking” sign attached to it.
- Pole 4631990E had an unauthorized “Plomero” sign attached to it.
- Pole 4940585E had an unauthorized “Plomero” sign attached to it.
- Pole 2202626E had an unauthorized “Gran Campaña Evangelística” sign attached to it.

Verizon Response: Verizon has not permitted or otherwise authorized these attachments and is therefore not in violation of this rule. Nevertheless, Verizon sent third party notices on August 16, 2023 regarding these issues to the base pole owners for these poles.

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

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).

A Verizon communication conductor attached to each of the following poles was strained by vegetation:

- GT89259
- 438117E
- 4168381E
- 4168386E
- 1377698E
- 1452524E

Verizon Response: Verizon has issued purchase orders to correct these issues.

GO 95, Rule 87.7-D1, 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: b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8.

The conduit protecting the Verizon riser attached to Pole GT89259 was damaged.

Verizon Response: Verizon has issued purchase orders to remediate this issue.



GO 95, Rule 84.7-A, Climbing Space, states in part:

Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

The climbing space on each of the following poles was obstructed by vegetation:

- 4383118E
- 835293H

Verizon Response: Verizon has issued purchase orders to remediate these issues.

GO95, Rule 84.4, Clearances(A)(6), Across or Along Public Thoroughfares, states in part:

Communication conductors over or across public thoroughfares shall have a clearance of 18 feet above ground.

The above ground clearance over a public thoroughfare of a Verizon conductor on Pole 4168386E was approximately 13 feet.

Verizon Response: Verizon has issued purchase orders to remediate this issue.

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.

The following Verizon underground facilities were not maintained for their intended use:

- The Verizon vault lid 0395 was corroded.
- The lock securing the pedestal cover 0149 was inoperable.

Verizon Response: Verizon has issued purchase orders to remediate these issues.



The following Verizon vault covers were missing bolts (not properly secured):

- MCG1 Fiber Vault
- 0420
- 0421
- 0422
- 0433
- 0436
- 0395
- 0398

Verizon Response: Verizon has issued purchase orders to remediate these issues.

Sincerely,

/s/ Jane Whang

Jane Whang