



February 2, 2024

Via Electronic Mail

Ricky Tse, 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) Morgan Hill/Gilroy Region

Dear Mr. Tse:

This responds to the staff's Audit Report of Verizon facilities in Morgan Hill and Gilroy. 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.

I. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. GO 95, Rule 94.3A, General Requirements states:

"Antennas shall meet the requirements of Class C equipment, unless otherwise specified in this rule."

GO 95, Rule 92.4C(2c), Ground Rods states in part:

"Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground."



ESRB's finding is listed in Table 2:

Table 2: GO 95, Rule 94.3A and 92.4C(2c) Finding

Location #	Finding
1	Ground rod is exposed.

Verizon Response: Verizon does not have records or photos documenting this condition. Nonetheless, Verizon has issued a Notice to Crown Castle to investigate and remediate this finding, if applicable.

2. GO 95, Rule 94.5A, Marking states:

“Joint use poles shall be marked with a sign for each antenna installation as follows:

- (1) Identification of the antenna operator*
- (2) A 24-hour contact number of antenna operator for Emergency or Information*
- (3) Unique identifier of the antenna installation.”*

ESRB's findings are listed in Table 3:

Table 3: GO 95, Rule 94.5A Findings

Location #	Findings
11	Dunne Ave. SC 5 has no identification of the antenna operator and no unique identifier of the antenna installation.
12	Dunne Ave. SC 3 has no identification of the antenna operator and no unique identifier of the antenna installation.

Response: Verizon has scheduled remediation in February for location #11. For location #12, Verizon is currently relocating the site to a streetlight but in the interim, will place signage on the antenna.



3. GO 95, Rule 94.3A, General Requirements states:

“Antennas shall meet the requirements of Class C equipment, unless otherwise specified in this rule.”

GO 95, Rule 89.3, Telephone Instruments on Poles or Structures states:

“Where a telephone instrument is attached to the surface of a pole or structure at less than 8 feet vertically above the ground (or at any elevation on a grounded metal pole or structure) and is connected to a private communication circuit constructed on the same pole line with, or colinear with, a Class H supply circuit, or is connected to a private communication circuit carried on crossarms with supply conductors of 750 – 22,500 volts, such instrument shall be enclosed in a suitable box of wood or equivalent insulating material, which shall be locked to prevent access by unauthorized persons.

Where such a telephone instrument is so attached, connected, and enclosed, unless isolated from the communication circuit by an adequate insulating transformer, a suitably insulated stool or platform, on which a person can stand while using the instrument, shall be provided.”

ESRB's findings are listed in **Table 4**.

Table 4: GO 95, Rule 94.3A and 89.3 Findings

Location #	Findings
4	GR 05 was missing a lock on disconnect box.
6	GR 07 was missing a lock on disconnect box.

Response: These are Crown Castle sites, and while these do not constitute “hazards,” Verizon issued a Notice of the deviation to Crown Castle on November 29, 2023.



4. 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 finding is listed in Table 5:

Table 5: GO 95, Rule 31.6 Finding

Location #	Finding
4	There is an abandoned and unattached communication line at GR 05.

Response: This is a Crown Castle site. Verizon issued a Notice of this deviation to Crown Castle on November 28, 2023.

5. 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 6:

Table 6: GO 95, Rule 17.1 Findings

Location #	Findings
2	Underground Equipment box was missing a lock. Cover was removable.
5	Panel is found open for generator plug.

Response: For location #2, it is an underground vault (not equipment box) and Verizon will remediate location #2 during its annual inspection, consistent with the priority level timeframes under GO 95. Verizon issued a notice to Crown Castle for location #5 on November 28, 2023.

6. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

“Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.”

ESRB’s findings are listed in Table 7:

Table 7: GO 128, Rule 17.8 Findings

Location #	Findings
2	No mark of ownership on ground mounted equipment serving GR 10.
5	No mark of ownership on underground equipment serving GR 01. .

Response: These are Crown Castle sites. Although GO 128 does not have specific notification



rules, Verizon issued Notices to Crown Castle regarding these findings on January 31 2024.

Sincerely,

/s/ Jane Whang

Jane Whang