

**CONFIDENTIAL ATTACHMENT 1**

**RECORDS FINDINGS**

1. Comcast only conducts complete patrol and detailed inspections of their communication lines and assets in High Fire Threat Districts (HFTD) as required by Rule 80.1.A.(1). In all other areas, inspections only take place during other scheduled work. When sending a technician into the field to investigate an issue, the technician inspects the assigned pole and the associated assets, along with one span in each direction. Comcast has no set schedule for detailed inspections and patrols that ensures all poles and assets are inspected thoroughly and completely as required by GO 95 and GO 128 in non-HFTD.

ESRB notes that Comcast East Bay's service area includes 103,533 poles. Comcast reports that Comcast averages 135,000 truck dispatches per year that include "one span in each direction" inspection. Truck dispatches are based on customer calls and service changes with multiple dispatches frequently occurring at a single address. This method of inspection does not assure thorough and complete inspection of all facilities on a timely basis.

**COMCAST'S RESPONSE:**

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- ESRB reviewed Comcast's East Bay Region patrol and detailed inspection records from August 2018 through August 2023 for the interval between inspections and the period since the last inspection. The East Bay Region covers parts of two counties: Alameda and Contra Costa. ESRB found a total of 9,297 inspections were late or are past due. Table 1 breaks down the total late inspections for the East Bay Region by HFTD Tier and delinquent category. Late inspections are any sequential inspections completed after the required interval. Past due inspections are inspections where the most recent inspection is overdue (past the required interval) as of August 31, 2023, the closing date of the record review.

Table 1: East Bay Region Late and Past Due Inspections

HFTD Tier	Late Inspections	Past Due Inspections*	Total
2	1,496	4,543	6,039
3	1,195	2,063	3,258
Total	2,691	6,606	9,297

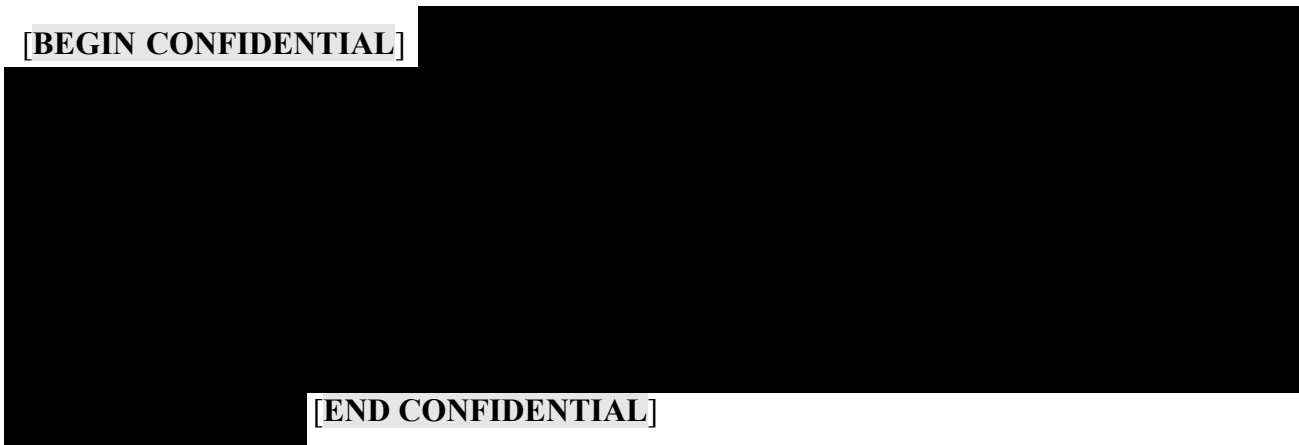
ESRB used GO 95, Rule 80.1-A(1) inspection intervals for Tier 2 and 3 to assess the timeliness of Comcast's inspection. Comcast reports that internal standards require annual inspections of all poles in Tier 2 and 3 areas regardless of HFTD Tier and proximity to supply lines. ESRB's analysis was based on street address as a unique identifier.

**Table 2: East Bay Region Most Past Due Inspections**

<b>HFTD Tier</b>	<b>Late Inspection Address</b>	<b>Most Recent Inspection</b>	<b>Days Late</b>
2	1196 Keith Ave., Berkeley	8/20/2018	1,004
3	27398 Fairview Ave. Hayward	8/15/2018	1,370

**COMCAST'S RESPONSE:**

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3. Comcast's *U-Safe Program: GO 95/128 Repair & Reporting Documentation* outlines the process for compliance reporting, documenting repairs, and reporting violations for technicians or contractors in the field. Upon arrival at the repair location, the technician will inspect the pole and one span to the left and right of the identified pole and report any violations. The technical uses the following to categorize the pole:

- P = Pass meaning there were no GO95/128 infractions at the assigned job.
- R = Repair meaning there were GO95/128 infractions that were corrected while on the job.
- F = Fail meaning that there were GO95/128 infractions that they could not fix in the time allotted for the job.

If a job is marked as Repair (R), the technician must document it with the appropriate completion code. If a job is marked as Fail (F), the technician must create an ER ticket, and if the work cannot be completed onsite, it will be assigned to the appropriate department for corrective action.

However, Comcast's U-Safe program manual does not include the timelines required for corrective actions. The list of work orders provided to ESRB include priority codes and timelines, but Comcast does not include the timelines associated with each priority code and how to assign the appropriate priority code to any findings of nonconformances identified as required by GO 95 with their manual.

Additionally, ESRB’s review of Comcast’s East Bay Region work orders from August 2018 through August 2023 found that 1,028 work orders that Comcast either closed late or were late and pending completion. Late closed work orders are work orders completed after the due date. Late pending work orders are work orders that had due dates prior to August 31, 2023 but were not complete by that date. Table 3 breaks down the total late and past due work orders for the East Bay Region by priority level and status.

**Table 3: East Bay Region Late Closed and Pending Work Orders**

Priority Levels	Late Closed Work Order	Late Pending Work Order	Total
<b>1</b>	<b>222</b>	<b>--</b>	<b>222</b>
<b>2</b>	<b>800</b>	<b>6</b>	<b>806</b>
<b>3</b>	<b>--</b>	<b>--</b>	<b>--</b>
<b>Total</b>	<b>1,022</b>	<b>6</b>	<b>1,028</b>

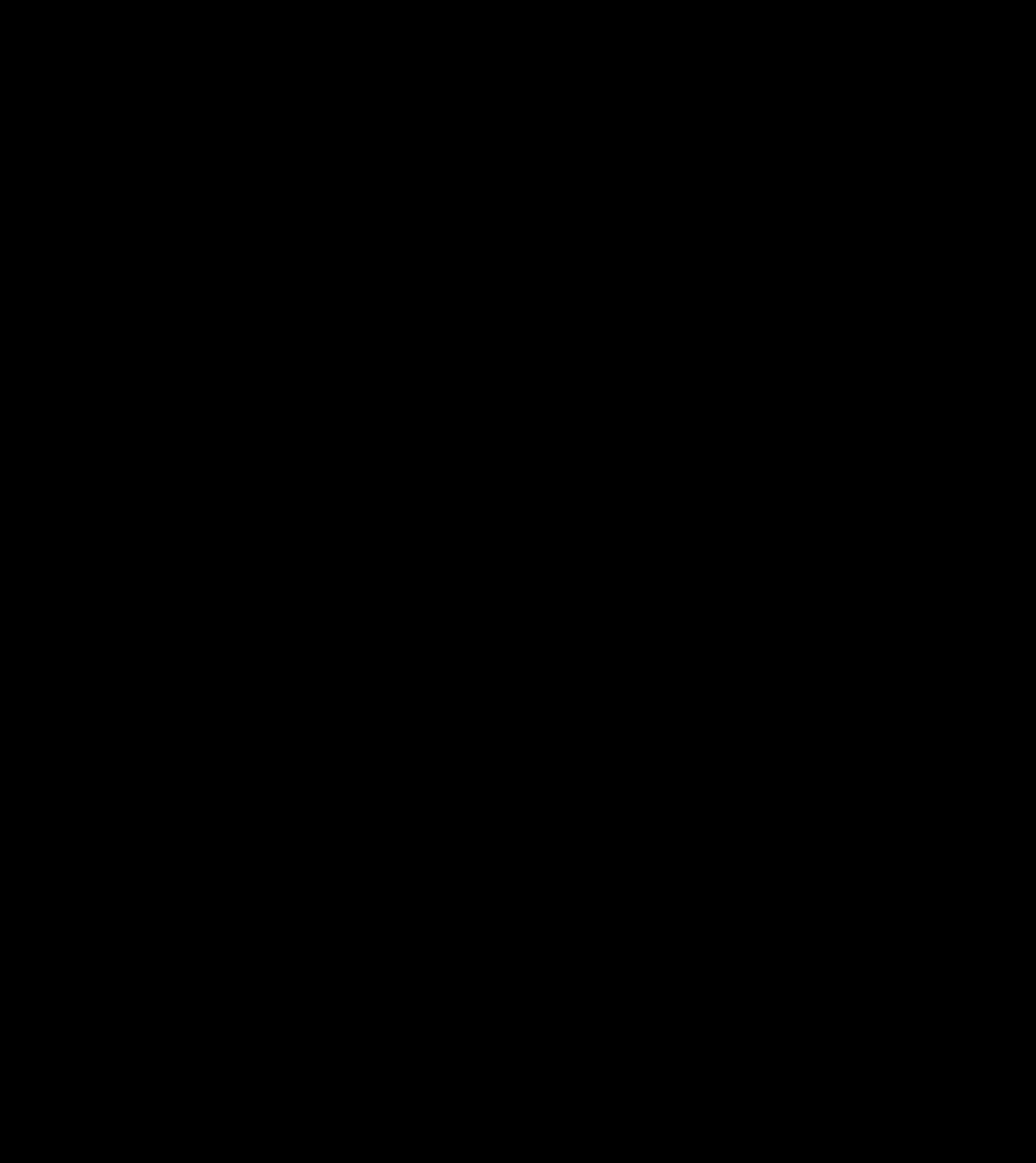
**Table 4: East Bay Region Most Overdue Closed Work Orders**

Priority Levels	Late Repair Address	Due Date/ Closed Date	Days Late
<b>1</b>	6632 Sunnymere Ave., Oakland	11/19/2020 7/27/2021	250
<b>2</b>	6382 Valley View Rd., Oakland	2/9/2019 10/16/2020	615

**COMCAST’S RESPONSE:**

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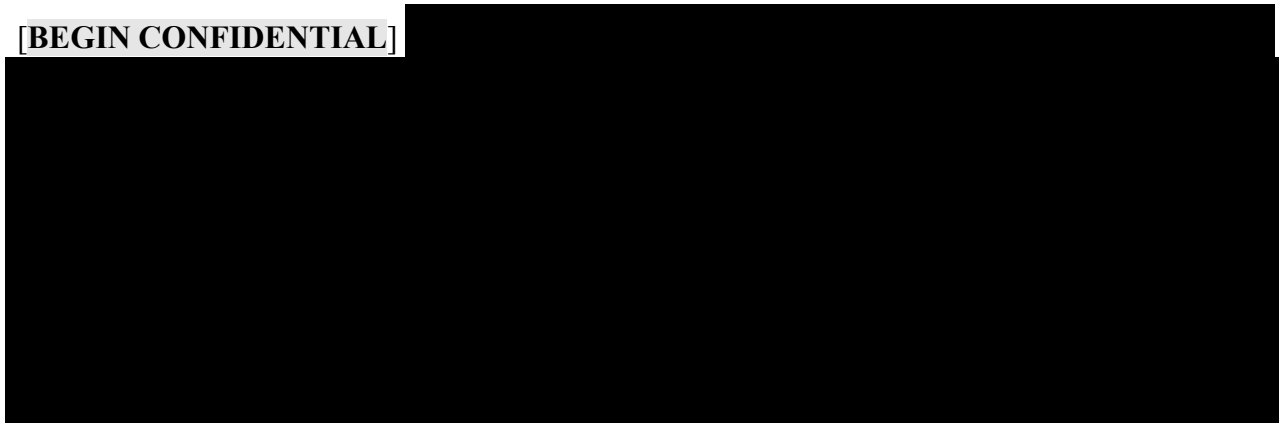
4. ESRB reviewed Comcast's East Bay Region patrol and detailed inspection records from August 2018 through August 2023 for the listed HFTD Tier level and found 778 locations (and approximately 1,600 occurrences) where the listed HFTD Tier level changed for sequential inspections. Tier levels should be consistent and are necessary to determine inspection and repair intervals. Table 5 provides an example of sequential records where the recorded HFTD level changed for a given address.

**Table 5: Example of Changing HFTD Tier Level on Sequential Inspections**

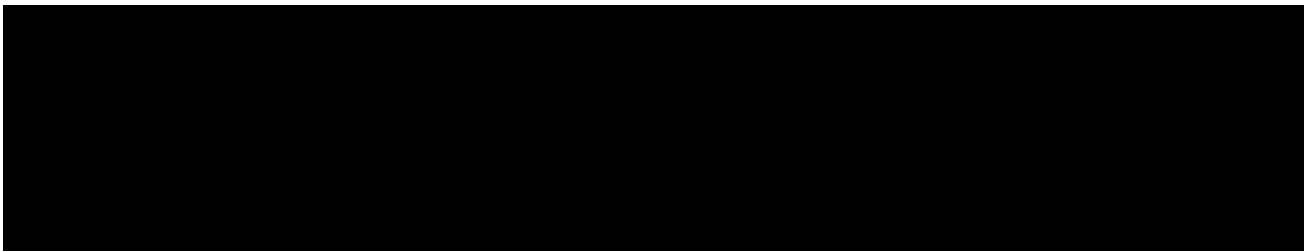
Street Address	City	Inspection	HFTD Tier
1020 Villa Nueva	El Cerrito	2/6/2021	2
1020 Villa Nueva	El Cerrito	5/29/2021	0
1020 Villa Nueva	El Cerrito	9/18/2021	3
1020 Villa Nueva	El Cerrito	2/2/2022	2
1020 Villa Nueva	El Cerrito	12/1/2022	3
1020 Villa Nueva	El Cerrito	1/28/2023	2

**COMCAST'S RESPONSE:**

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**CONFIDENTIAL ATTACHMENT 1**

**FIELD INSPECTION FINDINGS**

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Location #	Address	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
<b>Table 7: GO 95, Rule 31.1</b>					
26	37840 Farwell Dr., Fremont	OH	Service drop not secured to messenger properly.		
57	25509 Industrial Blvd., Hayward	OH	The vertical riser service drop is detached from the pole. (Repaired in field.)		
77	6973 Colton Blvd., Oakland	OH	Loose messenger (strand), broken lashing.		
<b>Table 8: GO 95, Rule 31.6 Findings</b>					
11	14074 Skyline Blvd., Oakland	OH	Abandoned service.		
72	1805 View Dr., San Leandro	OH	Abandoned service. (Repaired in field.)		
76	52 Castle Park Way, Oakland	OH	Abandoned service, mid span. (Repaired in field.)		
<b>Table 9: GO 95, Rule 35 Findings</b>					
34	215 School St., Fremont	OH	Vegetation is causing strain and abrasion. Tree guard moved from needed position, not protecting line or tree.		

Location #	Address	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
90	2308 Howe St., Berkeley	OH	Vegetation is causing strain and abrasion on the service drop.		
97	287 The Uplands, Berkeley	OH	Vegetation is causing strain and abrasion on the service drop.		
<b>Table 10: GO 95, Rule 38 Findings/</b>					
5	1805 33rd Ave., Oakland	OH	Drip loops contacting other communication lines.		
8	1915 33rd Ave., Oakland	OH	Drip loops contacting other communication lines.		
11	14074 Skyline Blvd., Oakland	OH	Service drop contacting other communication lines.		
31	4580 Central Ave., Fremont	OH	Drip loops contacting other communication lines.		
33	4495 Central Ave., Fremont	OH	Drip loops contacting other communication lines. Insufficient clearance to phone conductors.		
54	5500 Jensen Rd., Castro Valley	OH	Insufficient clearance to phone conductors. Lines and messenger embedded in branch section.		
90	2308 Howe St., Berkeley	OH	Insufficient clearance to phone conductors. Phone and communication lines contacting each other.		



Location #	Address	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
96	73 Evergreen Ln., Berkeley	OH	Service drop contacting other communication lines. (Repaired in field.)		
97	287 The Uplands, Berkeley	OH	Insufficient clearance to phone conductors. Phone and communication lines contacting each other.		
<b>Table 11: GO 95, Rule 84.6-B Findings</b>					
3	4424 Ygnacio Ave., Oakland	OH	The vertical ground wire is exposed, and the protective moulding cover is damaged.		
9	14122 Skyline Blvd., Oakland	OH	The vertical ground wire is exposed, and the protective moulding cover is damaged.		
85	4270 Adeline, Emeryville	OH	The vertical ground wire is exposed, and the protective moulding cover is damaged.		
99	116 Tunnel Rd., Berkeley	OH	The vertical ground wire is exposed, and the protective moulding cover is missing.		
<b>Table 12: GO 95, Rule 84.8-C Findings</b>					
61	1991 Bandoni Ave., San Lorenzo	OH	The service drop is hanging low over the curb line on public street.		
76	52 Castle Park Way, Oakland	OH	The service drop is hanging low over the curb line on public street.		

Location #	Address	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
<b>Table 13: GO 95, Rule 86.4-C(4) Finding</b>					
98	299 The Uplands, Berkeley	OH	The down guy is in contact with a tree and is deflected.		
<b>Table 14: GO 95, Rule 86.7-B Finding</b>					
93	135 Evergreen Ln., Berkeley	OH	Vegetation above the down guy insulator is contacting and grounding the anchor guy. (Repaired in field.)		
<b>Table 15: GO 95, Rule 87.7-D(1) Finding</b>					
89	2323 Howe St., Berkeley	OH	The riser guard is lifted and exposing the communication drops.		
<b>Table 16: GO 95, Rule 92.1-F(2) Findings</b>					
67	1398 Graff Ave., San Leandro	OH	Metal amplifier enclosure is contacting the phone lines.		
118	8532 Betty Ln., El Cerrito	OH	Metal amplifier enclosure is contacting the phone lines.		
<b>Table 17: GO 128, Rule 17.1 Findings</b>					
24	6066 Mowry, Newark	UG	Missing ground connection on amplifier.		
105	3230 Auto Plaza, Richmond	UG	Missing ground connection on amplifier.		
106	3223 Blume Dr., Richmond	UG	Raised bolt on cover causing a potential trip hazard. (Repaired in field.)		

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<b>Table 18: GO 128, Rule 17.8 Finding</b>					
43	32305 Claremont St. B, Union City	Pedestal	Missing ownership marking.		
<b>Table 19: GO 128, Rule 42.7 Findings</b>					
21	39201 Cedar Blvd., Newark	UG	Unsecured enclosure as found. (Repaired in field.)		
30	4549 Central Ave. B, Fremont	Pedestal	Unsecured enclosure as found. (Repaired in field.)		
105	3230 Auto Plaza, Richmond	UG	Cover not secured.		
111	1608 Bonita Rd., Richmond	Pedestal	Unsecured enclosure as found. (Repaired in field.)		
<b>Table 20: Third-Party Observations</b>					
1	46th Ave./ Ygnacio Ave., Oakland	OH	Cable has an exposed ground.		
2	4524 Ygnacio Ave., Oakland	OH	Cable has a slack down guy.		
4	Foothill Blvd./High St., Oakland	OH	Phone has an unsecured vertical drop.		
5	1805 33rd Ave., Oakland	OH	Supply insulator bob has pulled away from building.		
11	14074 Skyline Blvd., Oakland	OH	Phone line have insufficient clearance above bike path.		

Location #	Address	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
12	14102 Skyline Blvd., Oakland	OH	Phone has broken lashing.		
13	248 Inverness Ct., Oakland	OH	Phone service drop is contacting supply lines.		
17	1912 Ivy Way, Fremont	OH	Phone and supply have slack down guys.		
18	1922 Ivy Way, Fremont	OH	Phone and supply have a buried down guy anchor.		
25	Farwell Dr./ Keystone Dr., Fremont	OH	Cable has a preform wrapped around lines.		
26	37840 Farwell Dr., Fremont	OH	Phone has a slack down guy.		
28	37963 Farwell Dr., Fremont	OH	Phone has an unsecured vertical drop.		
31	4580 Central Ave., Fremont	OH	Phone has an unsecured vertical drop.		
53	5511 Jensen Rd., Castro Valley	OH	Supply has not maintained a firebreak around pole in an HFTD area.		
54	5500 Jensen Rd., Castro Valley	OH	Phone has an unsecured vertical drop.		
66	1384 Graff Ave., San Leandro	OH	Phone has tree strain on lines.		
67	1398 Greff Ave., San Leandro	OH	Phone service drop has low clearance over street.		

Location #	Address	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
69	1825 Astor Dr., San Leandro	OH	Phone has a slack down guy.		
70	1849 Astor Dr., San Leandro	OH	Supply has not maintained a firebreak around pole in an HFTD area.		
76	52 Castle Park Way, Oakland	OH	Supply and phone service drops have low clearance over street.		
78	6955 Colton Blvd., Oakland	OH	Phone service drops have low clearance over street.		
79	6947 Colton Blvd., Oakland	OH	Phone has an abandoned service drop.		
80	6930 Colton Blvd., Oakland	OH	Phone service needs to be transferred to the new pole.		
81	400 29th St., Oakland	OH	Phone has an unsecured vertical drop.		
83	2929 Summit St., Oakland	OH	Supply has a slack span/down guy.		
85	4270 Adeline, Emeryville	OH	Phone has an unsecured vertical drop.		
89	2323 Howe St., Berkeley	OH	Phone has broken lashing.		
90	2308 Howe St., Berkeley	OH	Phone has vegetation strain on service drop.		
93	135 Evergreen Ln., Berkeley	OH	Phone has vegetation strain on span.		

Location #	Address	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
94	105 Evergreen Ln., Berkeley	OH	Phone to supply service drop clearance less than 12 inches within 15 feet of attachment.		
94	105 Evergreen Ln., Berkeley	OH	Phone has a broken lashing.		
95	85 Evergreen Ln., Berkeley	OH	Phone has an abandoned service drop.		
96	73 Evergreen Ln., Berkeley	OH	Phone serviced drop not attached to pole (attached to pole step).		
99	116 Tunnel Rd., Berkeley	OH	Power, pole has excessive lean (10%), check for loading.		
99	116 Tunnel Rd., Berkeley	OH	Phone has a broken moulding. Phone has abandoned service drop. Phone has an unsecured vertical drop.		
100	719 Vaqueros Ave., Rodeo	OH	Phone has low service drop over edge of road.		
103	Vaqueros Ave./ 7th St., Rodeo	OH	Phone service needs to be transferred to new pole.		

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