STATE OF CALIFORNIA GAVIN C. NEWSOM., *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

June 22, 2023 CA2023-1074

John Gutierrez
Senior Director- Government Affairs
Comcast

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Comcast's Central Valley Region

Dear Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Dmitriy Lysak and Emiliano Solorio of ESRB staff conducted an CIP audit of Comcast Central Valley Region from April 24, 2023 through April 28, 2023. During the audit, ESRB staff conducted field inspections of Comcast's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations is enclosed.

Please provide a response no later than July 20, 2023, via electronic copy of all corrective actions and preventive measures taken by Comcast to correct the identified violations and prevent the recurrence of such violations and observations. The response should indicate the date of each remedial action and preventive measure taken for the violations and observations. For any outstanding items not addressed, please provide the projected completion dates of Comcast's corrective actions.

If you have any questions concerning this audit, please contact Dmitriy Lysak at (415) 940-4423 or dmitriy.lysak@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Audit Findings of Comcast Central Valley Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Dmitriy Lysak, Utilities Engineer, ESRB, SED, CPUC
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CPUC AUDIT FINDINGS OF

COMCAST CENTRAL VALLEY REGION

APRIL 24 – 28, 2023

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- The U-Safe Program, General Order (GO) 95/128 Repair and Reporting Documentation, version March 2, 2010.
- GO 95 Training Procedures as of April 2023 for Visual Inspections of Overhead Lines.
- GO 128 Training Procedures as of April 2023 for Visual Inspections of Underground Vaults, Handholes, and Pedestals.
- Central Valley Region Facility Statistics as of April 2023, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Central Valley Region Facility and Fire Tier Maps as of April 2023.
- Central Valley Region Work Order List containing data of facility locations, overhead or underground facility types, identified deficiencies, repair priority levels, corrective action due dates, and work completion dates from January 2018 through January 2023.
- Central Valley Region Inspection Data containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings from January 2018 through January 2023.
- Safety Hazards Notifications Comcast Received from Third Party Utilities from January 2018 through January 2023.
- Safety Hazard Notifications Comcast Sent to Third Party Utilities from January 2018 through January 2023.
- Central Valley Region Pole Loading Analysis Projects List from January 2018 through January 2023.
- Central Valley Region Pole Loading Analysis and Safety Factor Calculation Samples from January 2018 through January 2023.
- Comcast's Central Valley Region Employee Training Statistics, Training Schedules, and Training Materials from January 2018 through January 2023. This data consisted of lists of Comcast inspectors, technicians, pole loading engineers, spreadsheets of scheduled and completed training records, and copies of employee training materials used to train inspectors how to perform inspections and identify facility deficiencies.

II. Records Violations

ESRB observed the following violations during the record review portion of the audit:

1. **General Order (GO) 95, Rule 18-B(1)(a)** states in part:

"The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:

- *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*

(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:

- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:

- *Take corrective action within 60 months subject to the exception specified below."*

Comcast's definition of nonconformance priority levels is based on General Order 95, Rule 18. The Compliance Manager reviews the results of detailed inspections weekly and assigns an appropriate repair level based on Rule 18 repair intervals as well as Comcast's internal repair standards. The internal repair standard is more stringent than Rule 18. If an immediate safety hazard is found, the technician will immediately report it and stay on site, if required for public safety.

Comcast's records showed the following Repair Categories:

- **Repair Category 1:** 6 months from inspection date.
- **Repair Category 2:** 36 months from inspection date.
- **Repair Category 2.5:** 6 months from inspection date. This category is used for both High Fire Thread District Tier 2 and Tier 3 locations.
- **Repair Category 3:** 60 months from inspection date.

ESRB's review of Comcast's work orders submitted for the period from May 15, 2018 through April 22, 2023 found that Comcast had a total of 84 late work orders, including 3 late-closed work orders and 81 late-pending work orders in the Central Valley Region.

Table 1 below lists the late work orders in the Central Valley Region by different hazard levels.

Table 1: Late Work Orders in Central Valley Region

Repair Category	Late-Closed Work Orders	Late-Pending Work Orders	Total
1	-	-	-
2	3	81	**84**
2.5	-	-	-
3	-	-	-
Total	**3**	**81**	**84**

Late-closed work orders are those completed past their assigned due dates based on their repair categories, and late-pending work orders are those that had not been completed, as of April 22, 2023, by their assigned due dates based on their repair categories. Comcast is required to mitigate late work order issues, including completing any late-pending work orders.

Note: All pending work orders were from archived inspection and repair data from 2018-2020. The underlying data did not indicate which repairs have been completed. Comcast was able to manually determine repair dates for some repairs and is working on investigating the repairs for the remaining work orders.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure Type	Address	City
1	Pole	3221 Collier Rd	Acampo
2	Pole	3203 Collier Rd	Acampo
3	Pole	3149 Collier Rd	Acampo
4	Pole	3089 Collier Rd	Acampo
5	Pole	2979 Collier Rd	Acampo
6	Pedestal	25350 White Fence Ct	Acampo
7	Pole	3301 Collier Rd	Acampo
8	Pole	3343 Collier Rd	Acampo
9	Pole	25285 N Lower Sacramento Rd	Acampo
10	Pole	25276 N Lower Sacramento Rd	Acampo
11	Pole	25441 N Lower Sacramento Rd	Acampo
12	Pole	25441 N Lower Sacramento Rd	Acampo
13	Pedestal	19382 Del Rio Dr	Woodbridge
14	Pedestal	19442 Del Rio Dr	Woodbridge
15	Vault	555 Riverside Dr	Woodbridge
16	Vault	535 Riverside Dr	Woodbridge
17	Vault	19429 Wilderness Way	Woodbridge
18	Vault	564 Grand Rio Dr	Woodbridge
19	Pedestal	18656 North Lower Sacramento Rd	Woodbridge
20	Pedestal	18644 North Lower Sacramento Rd	Woodbridge
21	Pole	22 Academy St	Woodbridge
22	Pole	28 Academy St	Woodbridge
23	Pole	1912 Short Ave	Lodi
24	Pole	1900 Short Ave	Lodi
25	Pole	700 Short Ave	Lodi
26	Pole	724 North Mills Ave	Lodi
27	Pole	708 North Mills Ave	Lodi
28	Pole	708 North Mills Ave	Lodi
29	Pole	404 Lincoln Ave	Lodi
30	Pole	404 Lincoln Ave	Lodi
31	Pole	403 Olive Ct	Lodi
32	Pole	403 Olive Ct	Lodi
33	Pole	407 Olive Ct	Lodi
34	Pole	415 Olive Ct	Lodi
35	Pole	72 N Pacific Ave	Lodi
36	Pole	1406 W Elm St	Lodi
37	Pole	1107 Douglas Rd	Stockton
38	Pole	1125 Douglas Rd	Stockton

39	Pole	1151 Douglas Rd	Stockton
40	Pole	6408 Calhoun Way	Stockton
41	Pole	6308 Douglas Rd	Stockton
42	Pole	1306 Douglas Rd	Stockton
43	Pole	6348 Vicksburg Pl	Stockton
44	Pole	6142 Alexandria Pl	Stockton
45	Pole	6123 Alexandria Pl	Stockton
46	Pole	6009 Alexandria Pl	Stockton
47	Pole	2228 W Swain Rd	Stockton
48	Pole	2108 W Swain Rd	Stockton
49	Pole	2108 W Swain Rd	Stockton
50	Pole	2108 W Swain Rd	Stockton
51	Pole	2333 W March Ln	Stockton
52	Panel	2321 W March Ln	Stockton
53	Pole	3329 N Webster Ave	Stockton
54	Pole	3329 N Webster Ave	Stockton
55	Pole	3407 N Webster Ave	Stockton
56	Pole	3303 N Webster Ave	Stockton
57	Pole	2426 W Alpine Ave	Stockton
58	Pole	2516 Mission Rd	Stockton
59	Pole	2528 Mission Rd	Stockton
60	Pole	1875 Oxford Way	Stockton
61	Pole	2626 Mission Rd	Stockton
62	Pole	1873 Bristol Ave	Stockton
63	Pole	1875 County Club Rd	Stockton
64	Pole	N El Dorado St and E Maple St	Stockton
65	Pole	1905 N El Dorado St	Stockton
66	Pole	15 E Maple St	Stockton
67	Pole	5 E Maple St	Stockton
68	Pole	38 E Maple St	Stockton
69	Pole	1805 N El Dorado St	Stockton
70	Pole	1846 N El Dorado St	Stockton
71	Pole	36 E Maple St	Stockton
72	Pole	6 E Maple St	Stockton
73	Pole	1905 N El Dorado St	Stockton
74	Pole	1941 N El Dorado St	Stockton
75	Pole	32 E Wyandotte St	Stockton
76	Vault	417 Ward Ct	Manteca
77	Vault	450 Ward Ct	Manteca
78	Pedestal	1219 Springtime Ave	Manteca
79	Vault	1206 Springtime Ave	Manteca
80	Pedestal	1198 Springtime Ave	Manteca
81	Vault	1186 Springtime Ave	Manteca
82	Pedestal	1154 Springtime Ave	Manteca
83	Pedestal	851 Saratoga St	Manteca

84	Vault	845 Saratoga St	Manteca
85	Vault	865 Saratoga St	Manteca
86	Vault	877 Saratoga St	Manteca
87	Vault	1265 Trailwood Ave	Manteca
88	Vault	1570 Linden Way	Manteca
89	Pedestal	1560 Linden Way	Manteca
90	Vault	1319 Nana Pl	Manteca
91	Pedestal	1325 Nana Pl	Manteca
92	Pedestal	1554 Windgate Dr	Manteca
93	Vault	1540 Windgate Dr	Manteca
94	Pedestal	500 Winters Dr	Manteca
95	Vault	1570 Denese Ct	Manteca
96	Vault	1542 Denese Ct	Manteca
97	Vault	1510 Denese Ct	Manteca
98	Vault	1583 Elia Ct	Manteca
99	Vault	1555 Elia Ct	Manteca
100	Vault	1653 Tanager Ave	Manteca
101	Vault	1723 Tanager Ave	Manteca
102	Vault	1779 Tanager Ave	Manteca
103	Vault	1501 Tupelo St	Manteca
104	Vault	1777 Townsend Ave	Manteca
105	Vault	1764 Townsend Ave	Manteca
106	Vault	1751 Townsend Ave	Manteca
107	Vault	1719 Townsend Ave	Manteca
108	Vault	1519 Noble St	Manteca
109	Vault	1565 Noble St	Manteca
110	Vault	66 Reiger Dr	Lathrop
111	Vault	222 Reiger Dr	Lathrop
112	Vault	144 Reiger Dr	Lathrop
113	Vault	100 Camelback St	Lathrop
114	Vault	166 Showlow Ln	Lathrop
115	Pedestal	177 Showlow Ln	Lathrop
116	Pedestal	612 Wheat Field St	Lathrop
117	Pedestal	560 Wheat Field St	Lathrop
118	Pedestal	532 Wheat Field St	Lathrop
119	Pedestal	17828 Almond Orchard Way	Lathrop
120	Pedestal	17806 Almond Orchard Way	Lathrop
121	Pole	338 W Easton Ave	Tracy
122	Pole	362 W Easton Ave	Tracy
123	Pole	363 W Easton Ave	Tracy
124	Pole	412 W Easton Ave	Tracy
125	Pole	445 W Easton Ave	Tracy
126	Pole	1366 Wall St	Tracy
127	Pole	1352 Wall St	Tracy
128	Pole	405 W Highland Ave	Tracy

129	Pole	419 W Highland Ave	Tracy
130	Pedestal	1402 Evergreen Way	Tracy
131	Pedestal	1422 Evergreen Way	Tracy
132	Pedestal	1442 Evergreen Way	Tracy
133	Pedestal	1471 Greenwillow Way	Tracy
134	Pedestal	1451 Greenwillow Way	Tracy
135	Pedestal	1431 Greenwillow Way	Tracy
136	Pedestal	1411 Greenwillow Way	Tracy
137	Pedestal	1472 Evergreen Ct	Tracy
138	Pedestal	1492 Evergreen Ct	Tracy

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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."

   ESRB's findings are listed in Table 1:

Table 1: GO 95, Rule 31.1 Findings

Location #	Findings
29	Equipment needs to be transferred from buddy pole to new pole.
30	Equipment needs to be transferred from buddy pole to new pole.
61	Equipment needs to be transferred from buddy pole to new pole.
67	Damaged lashing wire.

2. **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 findings are listed in Table 2:

Table 2: GO 95, Rule 31.6 Findings

Location #	Findings
9	Abandoned service drop.
59	Abandoned service drop.
126	Abandoned service drop.

3. **GO 95, Rule 35, Vegetation Management states in part:**

> *"Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. 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). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule."*

ESRB's findings are listed in Table 3:

Table 3: GO 95, Rule 35 Findings

Location #	Findings
8	Tree branch strain and abrasion on cable.
39	Tree branch strain and abrasion on service drop.
122	Tree branch strain and abrasion on cable.

4. **GO 95, Rule 37, Table 1, Case No. 5B** requires the following:

> *Vertical clearance of communication conductors above ground in areas accessible to pedestrians only must be at least 10 feet.*

ESRB's finding is listed in Table 4:

Table 4: GO 95, Rule 37 Finding

Location #	Finding
27	Service drop is less than 10' above the ground.

5. **GO 95, Rule 38, Table 2, Case 16** requires the following:

16c. Radial separation of conductors on same crossarm, pole or structure between conductors, taps or lead wires of different circuits requires at least three inches of separation from communication conductors.

16d. Radial separation of conductors on same crossarm, pole or structure between conductors, taps or lead wires of different circuits requires at least eleven and one half inches of separation from service drops between 0-750 volts.

ESRB's findings are listed in Table 5:

Table 5: GO 95, Rule 38 Findings

Location #	Findings
8	Comcast communication conductors in contact with different companies' communication circuits.
29	Comcast communication conductors in contact with different companies' communication circuits.
42	Comcast communication conductors in contact with different companies' communication circuits.
48	Comcast communication conductors in contact with different companies' communication circuits.
55	Comcast communication conductors in contact with different companies' communication circuits.
59	Comcast communication conductors in contact with different companies' communication circuits.
63	Comcast communication conductors in contact with different companies' communication circuits.
71	Comcast communication conductors in contact with PG&E service drop.
72	Comcast communication conductors in contact with different companies' communication circuits.
74	Comcast communication conductors in contact with different companies' communication circuits.
127	Comcast communication conductors in contact with different companies' communication circuits.
129	Comcast communication conductors in contact with different companies' communication circuits.

6. **GO 95, Rule 38, Table 2, Case 18.C** requires the following:

   Radial separation between guys and span wires passing conductors supported on the same poles requires at least three inches of separation from communication conductors.

   ESRB's finding is listed in Table 6:

Table 6: GO 95, Rule 38 Finding

Location #	Finding
46	Comcast communication conductor in contact with down guy.

7. **GO 95, Rule 84.6.B, Ground Wires** states:

   "Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.

   Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8)."

   ESRB's findings are listed in Table 7:

Table 7: GO 95, Rule 84.6 Findings

Location #	Findings
3	Exposed vertical ground wire.
28	Exposed vertical ground wire.
32	Exposed vertical ground wire.
59	Exposed vertical ground wire.
63	Exposed vertical ground wire.
127	Exposed vertical ground wire.

8. **GO 95, Rule 86.9, Guy Marker (Guy Guard)** states in part:

> *"A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."*

ESRB's findings are listed in Table 8:

Table 8: GO 95, Rule 86.9 Findings

Location #	Findings
9	Anchor guy missing a guy marker.
75	Anchor guy missing a guy marker.

9. **GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground** states:

> *"Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:*
>
> *a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or*
>
> *b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8"*

ESRB's findings are listed in Table 9:

Table 9: GO 95, Rule 87.7 Findings

Location #	Findings
11	Riser does not cover 8 feet above the ground.
21	The bottom half of the vertical riser cover is damaged and exposes the Comcast riser cable.

10. GO 95, Rule 92.4.B, Grounding, Applicability states in part:

> *"The grounding of exposed communication cable systems includes cables with metallic shields, sheaths, or messenger(s). The isolating of exposed guys includes both overhead and anchor guys. Exposed communication cable systems are those that are subject to power contacts, power induction, or lightning."*

ESRB's findings are listed in Table 10:

Table 10: GO 95, Rule 92.4 Findings

Location #	Findings
48	Vertical ground wire is cut.
66	Vertical ground wire is cut.
70	Vertical ground wire is cut.

11. 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 11:

Table 11: GO 128, Rule 17.1 Findings

Location #	Findings	Notes
19	Ground wire disconnected.	Repaired in field.
20	Missing terminations caps.	Repaired in field.
81	Ground wire disconnected.	Repaired in field.
84	Missing ground wire.	
100	Missing terminations caps	Repaired in field.

Location #	Findings	Notes
104	Missing terminations caps	Repaired in field.
109	Missing terminations caps	Repaired in field.
110	Missing terminations caps	Repaired in field.
113	Missing ground wire.	
120	Missing terminations caps	Repaired in field.

12. GO 128, Rule 42.4, Manholes and Handholes, Size and Shape states in part:

> *"Manholes shall be constructed to provide sufficient working space so that the cables and equipment therein can be properly and safely installed, supported, operated and maintained."*

ESRB's finding is listed in Table 12:

Table 12: GO 128, Rule 42.4 Finding

Location #	Finding
114	The vault is damaged and beginning to buckle.

13. GO 128, Rule 42.7, Covers states:

> *"Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal (Also See Rule 17.8 and Appendix B, Figure 9)."*

ESRB's findings are listed in Table 13:

Table 13: GO 128, Rule 42.7 Findings

Location #	Findings
108	The vault lid is damaged.
110	The vault lid is damaged.

V. Observations

1. **GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards** states in part:

   (2) "Where a communications company's or an electric utility's (Company A's) actions result in potential violations of GO 95 for another entity (Company B), that entity's (Company B's) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

   (3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

   (4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO95."

Table 15 includes all non-Comcast (third party) findings that ESRB observed during the audit. ESRB witnessed Comcast created and sent third party notifications to the respective utilities for each observed finding. No follow-up from Comcast is required for the items below:

Table 14: Observations

Location #	Findings
1	AT&T line making contact with Comcast line.
9	AT&T abandoned service drop.
26	AT&T service drop attached to Comcast line.
33	AT&T service drop attached to Comcast line.

Location #	Findings
36	AT&T abandoned service drop.
38	AT&T abandoned service drop.
39	AT&T line excessive sag.
42	AT&T abandoned service drop.
43	AT&T bonded messenger line to Comcast line.
45	AT&T and PG&E exposed vertical ground.
46	AT&T line contacting PG&E down guy.
53	AT&T abandoned service drop.
55	AT&T abandoned service drop.
57	AT&T down guy missing guy guard.
59	AT&T service drop in contact with PG&E service drop.
64	PG&E down guy slack and missing guy guard.
68	AT&T bonded messenger line to Comcast line.
71	AT&T line making contact with Comcast line.
72	AT&T line making contact with Comcast line.
74	AT&T line making contact with Comcast line.
75	PG&E pole degraded.
111	PG&E vault lid damaged.
125	AT&T lashing wire damaged.
127	AT&T service drop attached to Comcast line.
131	AT&T pedestal damaged.
136	AT&T pedestal damaged.