

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 30, 2023

CA2023-1081

Ross Johnson  
AT&T Director of Regulatory Relations  
430 Bush Street, 5th Floor  
San Francisco, CA 94108

**SUBJECT:** Audit of AT&T North San Diego County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Calvin Choi and Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's North San Diego County District of the South Construction Region, from July 17, 2023 to July 21, 2023. The audit included a review of AT&T's inspection and maintenance records and a field inspection of AT&T communication facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than November 30, 2023, by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Calvin Choi at (213) 219-3034 or [Calvin.Choi@cpuc.ca.gov](mailto:Calvin.Choi@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC  
Calvin Choi, Utilities Engineer, CPUC

## AUDIT FINDINGS

### I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines

### II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

**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.*

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

*Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.*

AT&T's records indicated that for May 2022 to May 2023, AT&T completed 13 work orders past AT&T's due date for corrective action.

### III. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	P229529	Pole	Encinitas
2	P127041	Pole	Encinitas
3	P127040	Pole	Encinitas
4	P127039	Pole	Encinitas
5	P126461	Pole	Encinitas
6	P126460	Pole	Encinitas
7	P126459	Pole	Encinitas
8	P126458	Pole	Encinitas
9	P126281	Pole	Encinitas
10	P23390	Pole	Carlsbad
11	P26254	Pole	Carlsbad
12	P23389	Pole	Carlsbad
13	P120363	Pole	Carlsbad
14	P120364	Pole	Carlsbad
15	P221558	Pole	Carlsbad
16	P322862	Pole	Carlsbad
17	P126198	Pole	Carlsbad
18	P126199	Pole	Carlsbad
19	P325066	Pole	Carlsbad
20	P120050	Pole	Carlsbad
21	P125624	Pole	Carlsbad
22	P120049	Pole	Carlsbad
23	P229482	Pole	Carlsbad
24	P122032	Pole	Carlsbad
25	P28832	Pole	Carlsbad
26	P124733	Pole	Carlsbad
27	P222910	Pole	Carlsbad
28	P28831	Pole	Carlsbad
29	P717244	Pole	Carlsbad
30	1057817H	Pole	Fallbrook
31	P15460	Pole	Fallbrook
32	P15461	Pole	Fallbrook
33	1060840H	Pole	Fallbrook
34	P14562	Pole	Fallbrook
35	305 Elder St.	Pole	Fallbrook
36	1060834H	Pole	Fallbrook
37	331 Elder St.	Pole	Fallbrook
38	1060835H	Pole	Fallbrook
39	P206625	Pole	Fallbrook

40	P15464	Pole	Fallbrook
41	Z15456	Pole	Fallbrook
42	P253644S	Pole	Fallbrook
43	P15467	Pole	Fallbrook
44	P14412	Pole	Fallbrook
45	P167239	Pole	Fallbrook
46	P113721	Pole	Fallbrook
47	P13415	Pole	Fallbrook
48	P10390	Pole	Fallbrook
49	P3111460	Pole	Fallbrook
50	P612370	Pole	Fallbrook
51	830220H	Pole	Fallbrook
52	830221H	Pole	Fallbrook
53	825132H	Pole	Fallbrook
54	830222H	Pole	Fallbrook
55	Z117302	Pole	Fallbrook
56	P215921	Pole	Fallbrook
57	P208365	Pole	Fallbrook
58	P510015	Pole	Rainbow
59	P514052	Pole	Rainbow
60	P510016	Pole	Rainbow
61	P510017	Pole	Rainbow
62	1060795H	Pole	Rainbow
63	P510018	Pole	Rainbow
64	P510019	Pole	Rainbow
65	P510020	Pole	Rainbow
66	790997H	Pole	Rainbow
67	1026769H	Pole	Rainbow
68	102118H	Pole	Rainbow
69	P319475	Pole	Rainbow
70	P117069	Pole	Rainbow
71	P513246	Pole	Fallbrook
72	P18821	Pole	Fallbrook
73	1006011H	Pole	Fallbrook
74	P19802J	Pole	Fallbrook
75	P19803	Pole	Fallbrook
76	P19804	Pole	Fallbrook
77	1060930H	Pole	Oceanside
78	570413H	Pole	Oceanside
79	Behind 602 South Tremont St.	Pole	Oceanside
80	570412H	Pole	Oceanside
81	Behind 528 South Tremont St.	Pole	Oceanside
82	JP-227857	Pole	Oceanside
83	Behind 504 South Tremont St.	Pole	Oceanside
84	P23545	Pole	Oceanside

85	P23544	Pole	Oceanside
86	P23543	Pole	Oceanside
87	P31115	Pole	Oceanside
88	P210586S	Pole	Oceanside
89	P325212	Pole	Oceanside
90	Behind 307 Minnesota Ave.	Pole	Oceanside
91	P226072	Pole	Oceanside
92	Behind 606 Cleveland St.	Pole	Oceanside
93	Behind 614 Cleveland St.	Pole	Oceanside
94	Behind 306 Wisconsin Ave.	Pole	Oceanside
95	P224521	Pole	Oceanside
96	1003034H	Pole	Oceanside
97	1046003H	Pole	Oceanside
98	P126097	Pole	Oceanside
99	P210532	Pole	Oceanside
100	P120307	Pole	Oceanside
101	P28325	Pole	Oceanside
102	P27997	Pole	Oceanside
103	P137059	Pole	Oceanside
104	Behind 302 West St.	Pole	Oceanside
105	Behind 914 Cleveland St.	Pole	Oceanside
106	Behind 908 Cleveland St.	Pole	Oceanside
107	Behind 301 West Leonard Ave .	Pole	Oceanside
108	P419754	Pole	Oceanside
109	P419755	Pole	Oceanside
110	P419756	Pole	Oceanside
111	P419757	Pole	Oceanside
112	P419777	Pole	Oceanside
113	P419778	Pole	Oceanside
114	P419782	Pole	Oceanside
115	P419781	Pole	Oceanside
116	P419780	Pole	Oceanside
117	P419779	Pole	Oceanside
118	P419753	Pole	Oceanside
119	P199744S	Pole	Oceanside
120	P129565	Pole	Oceanside
121	P129562	Pole	Oceanside
122	P129561	Pole	Oceanside
123	P129560	Pole	Oceanside
124	P129558	Pole	Oceanside
125	P129556	Pole	Oceanside
126	P129557	Pole	Oceanside
127	P129930	Pole	Oceanside
128	P129929	Pole	Oceanside
129	P129928	Pole	Oceanside

130	P129927	Pole	Oceanside
131	P 129926	Pole	Oceanside
132	P129925	Pole	Oceanside
133	P129924	Pole	Oceanside
134	P129567	Pole	Oceanside
135	P129566	Pole	Oceanside
136	P215512	Pole	Oceanside
137	1058303H	Pole	Oceanside
138	P215511	Pole	Oceanside
139	P215510	Pole	Oceanside
140	P10095	Pole	Oceanside
141	807950H	Pole	Oceanside
142	466554H	Pole	Oceanside
143	185 Harding St.	Pedestal	Oceanside
144	151 Harding St.	Pedestal	Oceanside
145	125 Harding St.	Pedestal	Oceanside
146	119 Harding St.	Pedestal	Oceanside
147	5043 Andrew Jackson St.	Pedestal	Oceanside
148	107 McKinley St.	Pedestal	Oceanside
149	119 McKinley St.	Pedestal	Oceanside
150	131 McKinley St.	Pedestal	Oceanside
151	143 McKinley St.	Pedestal	Oceanside
152	155 McKinley St.	Pedestal	Oceanside
153	173 McKinley St.	Pedestal	Oceanside
154	191 McKinley St.	Pedestal	Oceanside
155	209 McKinley St.	Pedestal	Oceanside
156	221 McKinley St.	Pedestal	Oceanside
157	3243 Buena Hills Dr.	Pedestal	Oceanside
158	3263 Buena Vista Dr.	Pedestal	Oceanside
159	3283 Buena Vista Dr.	Pedestal	Oceanside
160	3647 North Way	Pedestal	Oceanside
161	3301 Buena Hills Dr.	SAI	Oceanside
162	3641 North Way	Pedestal	Oceanside
163	3625 North Way	Pedestal	Oceanside
164	3517 North Way	Pedestal	Oceanside
165	3601 North Way	Pedestal	Oceanside
166	3601 North Way	SAI	Oceanside
167	3598 North Way	Pedestal	Oceanside
168	3297 Calle Osuna	Pedestal	Oceanside
169	3275 Calle Osuna	Pedestal	Oceanside
170	3271 Calle Osuna	Pedestal	Oceanside
171	3565 Mira Pacific Dr.	Pedestal	Oceanside
172	3575 Mira Pacific Dr.	Pedestal	Oceanside
173	3241 Isabella Dr.	Pedestal	Oceanside
174	3235 Buena Hills Dr.	Pedestal	Oceanside

175	3231 Buena Hills Dr.	Pedestal	Oceanside
176	3211 Buena Hills Dr.	Pedestal	Oceanside
177	3209 Buena Hills Dr.	Pedestal	Oceanside
178	3185 Buena Hills Dr.	Pedestal	Oceanside
179	3181 Buena Hills Dr.	Pedestal	Oceanside
180	2614 Garden House Rd.	Pedestal	Carlsbad
181	2650 Peppertree Way	Pedestal	Carlsbad
182	2658 Peppertree Way	Pedestal	Carlsbad
183	2662 Peppertree Way	Pedestal	Carlsbad
184	2672 Peppertree Way	Pedestal	Carlsbad
185	6320 Huntington Dr. Alley	Pedestal	Carlsbad
186	6324 Huntington Dr. Alley	Pedestal	Carlsbad
187	6336 Huntington Dr. Alley	Pedestal	Carlsbad
188	Side of 6351 Huntington Dr.	Pedestal	Carlsbad
189	6338 Heritage Dr. Alley	Pedestal	Carlsbad
190	6330 Heritage Dr. Alley	Pedestal	Carlsbad
191	6318 Heritage Dr. Alley	Pedestal	Carlsbad
192	6310 Heritage Dr. Alley	Pedestal	Carlsbad
193	2672 Peppertree Way	Pedestal	Carlsbad
194	2662 Peppertree Way	Pedestal	Carlsbad
195	2654 Peppertree Way	Pedestal	Carlsbad
196	7073 Marsh Wren St.	Pedestal	Carlsbad
197	7065 Marsh Wren St.	Pedestal	Carlsbad
198	7045 Marsh Wren St.	Pedestal	Carlsbad
199	7021 Marsh Wren St.	Pedestal	Carlsbad
200	7005 Marsh Wren St.	Pedestal	Carlsbad
201	7001 Marsh Wren St.	Pedestal	Carlsbad
202	7020 Cinnamon Teal St.	Pedestal	Carlsbad
203	7028 Cinnamon Teal St.	Pedestal	Carlsbad
204	7036 Cinnamon Teal St.	Pedestal	Carlsbad
205	7047 Rose Dr.	Pedestal	Carlsbad
206	7059 Rose Dr.	Pedestal	Carlsbad
207	7075 Rose Dr.	Pedestal	Carlsbad

#### **IV. Field Inspection – Violations List**

We observed the following violations during the field inspections:

**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.*

The AT&T facilities on each of the following poles were not maintained for their intended use:

- P221558: an AT&T terminal box on the pole was not closed or locked.
- Z117302L: an AT&T terminal box was not attached to the pole.
- P215510: an AT&T down guy anchor near this pole was completely buried.
- P19802J: an AT&T conductor was hanging significantly below the other conductors.

The AT&T facilities on the following buddy poles need to be transferred to the new poles:

- P28832
- P510015
- P513246
- P27997

**GO 95, Rule 56.2, Uses (Guy Wires)**, states in part:

*Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.*

AT&T down guy wire supporting each of the following poles was not taut:

- P23389
- P419757
- P419777
- P199744S
- P129927
- P129567



**GO 95, Rule 84.8-C2b: Above Private Thoroughfares or Private property**, states in part:

*Residential Premises: Over residential driveways, lanes or over property accessible to vehicles, service drops shall not be less than 12 feet. EXCEPTION: If the building served does not permit an attachment which will provide this 12 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible, but in no case less than 10 feet.*

An AT&T service drop attached to pole P510018 had an above ground clearance of less than 10 feet going across a driveway of a private property.

**GO 95, Rule 84.6-B, Ground Wires**, states in part:

*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.*

The ground moulding attached to Pole P253644S was damaged.

**GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground:**

*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 for AT&T risers attached to each of the following poles was missing or not properly secured:

- P127041
- P126460
- P23390
- P229482
- P28831
- Z15456
- P14412
- P167239
- P10390
- P3111460
- P612370
- 825132H
- Z117302
- P19803
- 570413H
- P325212
- Pole Behind 614 Cleveland St.
- 1046003H
- P137059
- 466554H

**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.*

AT&T service drops attached to each of the following poles were cut, permanently abandoned, and should be removed:

- P126281
- P222910
- 1060834H
- P208365
- Pole Behind 908 Cleveland St.
- P419779
- P129561

**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 the pole located behind 914 Cleveland Street, was obstructed by thick vegetation from the ground to a few feet below the AT&T conductors.

**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).*

The AT&T conductor supported on Poles numbered P215921 and P208365 was strained by vegetation.