

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

**March 11, 2024****CA2023-1160**

Ross Johnson
Area Manager Regulatory Relations
AT&T North, 430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Mendocino and Lake Counties

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell and Joe Murphy of ESRB staff conducted a communication audit of AT&T Mendocino and Lake Counties from November 27, 2023 through December 01, 2023. During the audit, ESRB staff conducted field inspections of AT&T's communication facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than April 9, 2024, by electronic copy of all corrective actions and preventive measures taken by AT&T to correct the identified violations and prevent the recurrence of such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

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

Enclosure: CPUC Communication Audit Report for AT&T Mendocino and Lake County Region

Cc:

Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
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**AT&T MENDOCINO AND LAKE COUNTY REGION
COMMUNICATIONS AUDIT FINDINGS
NOVEMBER 27 – DECEMBER 1, 2023**

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for AT&T's Mendocino and Lake County Region:

- Facility statistics as of October 2023, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Overhead and Underground facility maps as of 2023.
- AT&T Overhead Lines Maintenance Plan, GO 95 Rule 18, Version 4.0, May 22, 2023.
- Employee statistics and employee training records.
- Inspection and patrol records containing data for the inspected facility type, facility location, fire threat district location, inspection date from July 01, 2018 to October 01, 2023.
- AT&T Visual Inspection of Overhead Line, GO 95 Rule 80.1A, April 18, 2023.
- Records of OH and UG corrective actions completed from 2018 to October 01, 2023 in accordance with GO 95, Rule 80.1-A4 and 94.2; GO 128, Rule 12.2 and 17.1. Please provide a list showing the address/GPS coordinates, dates the findings were first identified, priority codes, due dates, and completion dates.
- Records of OH and UG corrective actions completed from 2018 to October 01, 2023 in accordance with GO 95, Rule 80.1-A4 and 94.2; GO 128, Rule 12.2 and 17.1. Please provide a list showing the address/GPS coordinates, dates the findings were first identified, priority codes, due dates, and completion dates.
- Records for intrusive pole inspections conducted from July 01, 2018 to October 01, 2023 in accordance with GO 95, Rule 80.1-B.
- Records for all outgoing Safety Hazard notifications, per GO 95, Rule 18-B, from 2018 to October 01, 2023.
- Records for all incoming Safety Hazard notifications, per GO 95, Rule 18-B, from 2018 to October 01, 2023.
- A list of all pole safety factor calculations completed from July 01, 2018 to October 01, 2023.
- A list of all new OH and UG construction projects completed from July 01, 2018 to October 01, 2023.

II. Records Violations

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

1. General Order (GO) 95, Rule 31.2, Inspection of Lines states in part:

“Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.”

GO 95, Rule 80.1-A(2), Statewide Inspection Requirements states in part:

“Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State.”

AT&T only conducts complete patrol and detailed inspections of their communication lines and assets in Distribution Areas (DA) that contain High Fire Threat Districts.¹ In all other areas, no regular inspections take place. AT&T 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.

2. General Order 128, Rule 41.2 Duct Systems, Rule 42.2 Manholes and Handholes, Rule 43.2 Buried Cables and Conductors, Maintenance and Inspection states:

“See Rules 12.2 and 17.2.”

GO 128, Rule 17.2, Inspection states in part:

“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules.”

AT&T provides no procedures to ensure underground assets are inspected thoroughly and completely as required by GO 128.

3. General Order (GO) 95, Rule 31.2, Inspection of Lines states in part:

“Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules.”

¹ AT&T Visual Inspection of Overhead Lines, Section 5.1.1

Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.”

GO 95, Rule 80.1-A(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District states in part:

“In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals... shall not exceed the time specified in the following Table.”

Inspection	Tier 2	Tier 3
Patrol	2 years	1 year
Detailed	10 years	5 years

ESRB’s review of AT&T’s Mendocino and Lake County Region patrol and detailed inspection records from July 01, 2018 to October 01, 2023 for the interval between inspections and the period since the last inspection. AT&T’s inspection records are listed by Distribution Areas (DA) and only includes those DAs that contain HFTD Tier 2 or Tier 3 areas.² ESRB found a total of 201 DA inspections that were late or are past due, leading to an unknown number of assets/facilities being inspected late.³ Table 1 breaks down the total late work orders for the Mendocino and Lake County Region by HFTD Tier and delinquent category. Late inspections are sequential inspections completed after the required interval. Overdue inspections are inspections where the most recent inspection is overdue (past the required interval) as of September 30, 2023.

Table 1: Mendocino and Lake County Region Distribution Areas⁴ with Late and Overdue Inspections

HFTD Tier	Late Inspection	Overdue Inspection*	Total
2	192	0	192
3	0	9	9
Total	192	9	201

*as of Sept 30, 2023

ESRB used GO 95, Rule 80.1-A(1) inspection intervals for Tier 2 and 3 to assess the timeliness of AT&T’s inspection. AT&T reported that inspections are recorded by DA and not by facility. The number of poles with late and overdue inspection cannot be determined but will exceed the values noted in Table 1 by a factor of the number of poles in each DA.

² Ibid

³ The number of inspected assets within a DA varies. For example, DA 211351 (southwest of Kelseyville) contains 26 assets with violations with an unknown number of assets without violations.

⁴ Ibid, each DA may contain several hundred assets requiring inspection.

Table 2 lists the latest and most overdue inspections.

Table 2: Mendocino and Lake County Region Latest and Most Overdue Inspections

HFTD Tier	Late Inspection DA_PSA_CD CLLI ID	First Inspection/ Next Inspection (Interval, days)	Overdue DA_PSA_CD CLLI ID	Most Recent Inspection
2	310151 UKIHCA12	6/1/2019 8/2/2023 (1,523)	-	-
3	-	-	R3119 LKPTCA02	5/5/2023

4. GO 95, Rule 18-B, Maintenance Programs states in part:

“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company’s facilities.”

(1) *“Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.*

a. 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.”

- a. ESRB’s review of AT&T’s Mendocino and Lake County Region pending and completed repairs and found the use of Hazard Level “2c” in each year, 2018 through 2023. The AT&T Overhead Lines Maintenance Plan, GO 95 Rule 18, Version 4.0 (May 22, 2023) under Section 3.1 Classification of Nonconformance does not list a Level 2c. Previous revisions of the AT&T Overhead Lines Maintenance Plan prior to June 28, 2019 also do not list a Level 2c Nonconformance. No corrective action interval for Level 2c is established in any provided AT&T Overhead Lines Maintenance Plan.
- b. ESRB’s review of AT&T’s Mendocino and Lake County Region work orders from July 1, 2018 to October 1, 2023 found that AT&T incorrectly assigned due dates for 240 work orders. The assigned dates either exceeded Rule 18 corrective action interval or had due dates that preceded the origination date. Table 3 breaks down the number of incorrectly assigned due dates by hazard level.

Table 3: Mendocino and Lake County Region Incorrectly Assigned Due Dates

Hazard Level	Rule 18 Interval	Incorrect Due Date
1	3 days ⁵	19 ⁶
2	36 months	79
2a	12 months	0
2b	6 months (Tier 3) 12 months (Tier 2)	14 ⁷
2c	Unk	Unk ⁸
3	60 months	128
Total	-	240

⁵ Rule 18 notes the corrective action as ‘immediate’. AT&T uses an internal standard of 3 days for recordkeeping.

⁶ 12 entries with due dates before the creation date.

⁷ Hazard Level 2b was assigned to 100 work orders where the Fire Tier was ‘blank’, these 14 exceeded 36 months.

⁸ Hazard Level 2c was assigned to 51 work orders with resolution intervals of 80 to 365 days. Per AT&T’s post audit DR response, 2c is used for “Tech and Fire Sa fety” which does not provide enough information to assess if the assigned interval complies with Rule 18.

- c. Additionally, ESRB’s review of AT&T’s Mendocino and Lake County Region work orders from July 1, 2018 to October 1, 2023 found that AT&T completed a total of 1,414 work orders late or are late pending. 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 September 30, 2023 but were not complete by that date.

Table 4 breaks down the closed late work order for the Mendocino and Lake County Region by Hazard Level and Fire Tier.

Table 4: Mendocino and Lake County Region Late Closed Work Orders

Hazard Level	Fire Tier (blank)	Fire Tier 1	Fire Tier 2	Fire Tier 3	Total
1	116	20	24	6	166
2	-	9	1	-	10
2a	1	5	13	1	20
2b	-	3	37	-	40
2c	7	7	10	7	31
Total	124	44	85	14	267

Table 5 breaks down the late pending work orders for the Mendocino and Lake County Region by Hazard Level and Fire Tier as of September 30, 2023.

Table 5: Mendocino and Lake County Region Late Pending Work Orders

Hazard Level	Fire Tier (blank)	Fire Tier 1	Fire Tier 2	Fire Tier 3	Total
1	-	-	1	1	13
2	5	141	25	22	193
2a	2	-	382	128	512
2b	3	144	146	85	378
2c	5	-	37	37	51
Total	15	602	602	245	1,147

Table 6 lists the latest closed and most past due pending work orders.

Table 6: Mendocino and Lake County Region Latest and Most Past Due Work Orders

Package ID	Mark It ID	Hazard Level	Fire Tier	Due Date	Closed Date	Days Late
469191	100069754	2c	2	6/6/2020	9/12/2023	1,193
478568	100075525	2b	2	6/13/2020	Pending	1,204*

*as of September 30, 2023

5. General Order 95, Rule 18 B Maintenance Programs state in part:

“Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions.”

AT&T did not produce a training program demonstrating the required qualifications for its inspectors nor a list of required qualifications for its contracted inspectors.

III. Field Inspection

During the field audit, ESRB inspected the following facilities:

Loc #	Structure Type	ID	Address	City	Lat	Long
1	OH	Package: 392600	1031 N. State St	Ukiah	39.16170	-123.20942
2	OH		999 N. State St	Ukiah	39.16147	-123.20938
3	OH		995 N. State St	Ukiah	39.16128	-123.20928
4	OH		969 N. State St	Ukiah	39.16087	-123.20919
5	OH		Millview Rd x Zinfandel Dr.	Ukiah	39.17177	-123.21374
6	OH		140 Zinfandel Dr	Ukiah	39.17180	-123.21395
7	OH		170 Zinfandel Dr	Ukiah	39.17176	-123.21438
8	OH	Package: 871102	100 Feed Lot Ln.	Ukiah	39.17091	-123.21357
9	Ped	Package: 871103	33210 Albion Ridge	Albion	39.22343	-123.75566
10	Ped		33210 Albion Ridge	Albion	39.22348	-123.75563
11	OH		33251 Albion Ridge	Albion	39.22338	-123.75712
12	Ped		33251 Albion Ridge	Albion	39.22342	-123.75717
13	OH		33270 Albion Ridge	Albion	39.22339	-123.75745
14	OH		7052 Shoreline Hwy	Little River	39.26324	-123.78469
15	OH		7036 N Hwy 1	Little River	39.26299	-123.78466
16	OH	Package: 1345444	7020 N Hwy 1	Little River	39.26222	-123.78448
17	OH		7000 N Hwy 1	Little River	39.26165	-123.78433
18	OH		8210 Shoreline Hwy	Little River	39.27744	-123.79149
19	OH	Package: 774670	8190 Shoreline Hwy	Little River	39.27714	-123.79183
20	OH		8150 Shoreline Hwy	Little River	39.27681	-123.79148
21	OH		8291 Shoreline Hwy	Little River	39.27638	-123.79148
22	OH	Package: 775480	25251 Shoreline Hwy	Inglenook	39.49929	-123.77364
23	OH		S of 25251 Shoreline Hwy	Inglenook	39.49946	-123.77412
24	OH		25201 Shoreline Hwy	Inglenook	39.49888	-123.77436
25	OH		25195 Shoreline Hwy	Inglenook	39.49868	-123.77485
26	OH		237 Laurel St.	Ft. Bragg	39.44552	-123.80380
27	OH		245 Laurel St.	Ft. Bragg	39.44544	-123.80340
28	OH		323 Laurel St.	Ft. Bragg	39.44547	-123.80293
29	OH		327 Laurel St.	Ft. Bragg	39.44556	-123.80215
30	OH		333 Laurel St.	Ft. Bragg	39.44546	-123.80226
31	OH		38975 Sherwood Rd	Laytonville	39.60622	-123.46728
32	OH	Package: 1070756	38975 Sherwood Rd	Laytonville	39.60582	-123.46704
33	OH		38975 Sherwood Rd	Laytonville	39.60526	-123.46695
34	OH		24765 Birch St.	Willits	39.43478	-123.38224
35	OH	Package: 1349953	24765 Birch St.	Willits	39.43543	-123.38356
36	OH		Corner: Birch/Clover	Willits	39.60290	-123.38431
37	OH	PLC: A01YGDC	125 E. Commercial	Willits	39.41254	-123.35302
38	OH		155 E. Commercial	Willits	39.41227	-123.35252
39	OH		200 E. Commercial	Willits	39.41252	-123.35219
40	OH		262 E. Commercial	Willits	39.41219	-123.35157
41	OH		Main x E. Commercial	Willits	39.41233	-123.35227

Loc #	Structure Type	ID	Address	City	Lat	Long
42	OH	Package: 1010651	1471 S. Main St.	Willits	39.39542	-123.34816
43	OH		1471 S. Main St.	Willits	39.39537	-123.34853
44	OH		1471 S. Main St.	Willits	39.39526	-123.34883
45	OH		1471 S. Main St.	Willits	39.39522	-123.34898
46	OH		1471 S. Main St.	Willits	39.38619	-123.34891
47	OH		1507 S. Main St.	Willits	39.39552	-123.35888
48	OH	Package: 1347924	2385 Baywood Way	Willits	39.32979	-123.33934
49	OH		16061 Black Bart Dr.	Willits	39.34111	-123.34272
50	OH		16025 Black Bart Dr.	Willits	39.34164	-123.34285
51	OH		16040 Black Bart Dr.	Willits	39.34232	-123.34105
52	OH		16039 Black Bart Dr.	Willits	39.34243	-123.34068
53	OH	Package: 1237162	16153 Black Bart Dr.	Willits	39.34351	-123.33894
54	OH	Package: 365873	16336 Black Bart Dr.	Willits	39.34528	-123.32734
55	OH		16330 Black Bart Dr.	Willits	39.34570	-123.32815
56	OH		16324 Black Bart Dr.	Willits	39.34607	-123.32877
57	OH		16318 Black Bart Dr.	Willits	39.34624	-123.32962
58	OH		16312 Black Bart Dr.	Willits	39.34625	-123.33012
59	OH	PLC: A027XLA	16015 Davis Ave.	Clearlake	38.94604	-122.60839
60	OH		16520 Davis Ave.	Clearlake	38.95380	-123.60382
61	OH	Package: 1001427	15682 40th Ave.	Clearlake Highlands	38.95077	-122.61919
62	OH		Oak x 40th Ave.	Clearlake Highlands	38.95092	-123.62042
63	OH		Oak Street	Clearlake Highlands	38.95076	-122.61995
64	OH		End of Fir St.	Clearlake Highlands	38.95082	-122.61908
65	OH		Fir St.	Clearlake Highlands	38.95095	-122.61914
66	OH		4391 Fir St.	Clearlake Highlands	38.95100	-122.61943
67	OH		4381 Fir St.	Clearlake Highlands	38.95129	-122.61920
68	OH	Package: 725583	14230 Pearl St.	Clearlake	38.96313	-122.64559
69	OH		14209 Pearl St.	Clearlake	38.96323	-122.64580
70	OH		14206 Pearl St.	Clearlake	38.96321	-122.64630
71	OH		3689 Oak Lane	Clearlake	38.96367	-122.64751
72	OH		3452 Country Club Dr.	Lucerne	39.08502	-122.78939
73	OH	Package: 831798	3442 Country Club Dr.	Lucerne	39.08484	-122.78945
74	OH		3451 Country Club Dr.	Lucerne	39.08435	-122.78900
75	OH		3342 Country Club Dr.	Lucerne	39.08442	-122.78915
76	OH	Package: 991722	6821 Broadway Ave	Nice	39.12579	-122.84619
77	OH		Broadway Ave x Sayre St.	Nice	39.12526	-122.84638
78	OH		6825 Sayre	Nice	39.12516	-122.84638

Loc #	Structure Type	ID	Address	City	Lat	Long
79	OH		6862 Broadway Ave	Nice	39.12631	-122.84623
80	OH		6868 Broadway Ave	Nice	39.12680	-122.84642
81	OH	Package: 992055	W State Highway 20	Upper Lake	39.16736	-122.91831
82	OH		W State Highway 20	Upper Lake	39.16700	-122.91837
83	OH		W State Highway 20	Upper Lake	39.16665	-122.91838
84	OH		W State Highway 20	Upper Lake	39.16599	-122.91836
85	OH		W State Highway 20	Upper Lake	39.16609	-122.91855
86	OH		W State Highway 20	Upper Lake	39.16341	-122.91875
87	OH		W State Highway 20	Upper Lake	39.16394	-122.91843
88	OH		W State Highway 20	Upper Lake	39.16368	-122.08491
89	UG	Const: A01QVN5	1236 Airport Blvd	Ukiah	39.13047	-123.19820
90	UG		1236 Airport Blvd	Ukiah	39.13151	-123.19899
91	OH	Package: 1012793	575 Blue Oak	Ukiah	39.05507	-123.14825
92	OH		570 Blue Oak	Ukiah	39.05526	-123.14844
93	OH		600 Blue Oak	Ukiah	39.05563	-123.14730
94	OH		601 Blue Oak	Ukiah	39.05566	-123.14757
95	OH		630 Blue Oak	Ukiah	39.05586	-123.14735
96	OH		640 Blue Oak	Ukiah	39.05575	-123.14613
97	OH	Package: 998736	1900 Feliz Creek	Hopland	38.97897	-123.14757
98	OH		1900 Feliz Creek	Hopland	38.97963	-123.14798
99	OH		1900 Feliz Creek	Hopland	38.97872	-123.14669
100	OH		1900 Feliz Creek	Hopland	38.97846	-123.14576
101	OH	Package: 1062299	13600 Mountain House Rd.	Hopland	38.96936	-123.11706

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 related to the above rule are listed in Table 7:

Table 7: GO 95, Rule 31.1 Findings

Location	Findings
02	Loose Hi-vis strip
08	The guy anchor is buried below grade
13	Loose AT&T equipment hanging on the pole
14	Pole leaning over 10%
15	Pole leaning over 10%
16	Pole leaning over 10%
17	Pole leaning over 10%
18	Pole leaning over 10%
22	Hi-vis strips were painted over
33	Pole leaning over 10%
34	There is an abandoned buddy pole
35	The communication lashing wire is loose/broken
38	The communication lashing wire is loose/broken
42	There is an abandoned buddy pole
47	There is an abandoned communication service pole
51	The communication lashing wire is loose/broken
52	The communication lashing wire is loose/broken

Location	Findings
53	The communication lashing wire is loose/broken
54	Hi-vis strips are damaged
55	Hi-vis strips are missing
56	Hi-vis strips are damaged/missing
57	Hi-vis strips are damaged
58	Hi-vis strips are damaged
59	Hi-vis strips are damaged/missing
64	The guy anchor is buried below grade
71	The guy anchor is buried below grade
75	Pole leaning over 10%
92	The guy anchor is buried below grade
93	There is an abandoned guy anchor

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 related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 31.6 Findings

Location	Findings
21	There is an abandoned communication service drop
35	There is an abandoned communication service drop
47	There is an abandoned communication service drop
72	There is an abandoned communication service drop
75	There were abandoned lines down outside a school, AT&T created a Hazard Level 1 notification and notified local crew

Location	Findings
88	There is an abandoned communication service drop
95	There is an abandoned communication 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 related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 35 Findings

Location	Findings
07	There is overgrown vegetation attached to the communication lines
42	There is strain and abrasion on the communication line

4. GO 95, Rule 38, Minimum Clearance of Wires from Other Wires states in part:

“The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.”

Table 2, Case 3C: The clearance between wires, cables and conductors not supported on the same poles, vertically at crossings in spans and radially where colinear or approaching crossings for communication conductors (including open wire, cables and service drops) must be at least 24 inches.

Table 2, Case 8C: Vertical separation between conductors and/or cables, on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole and in adjoining midspans for communication conductors (including open wire, cables and service drops) must be at least 12 inches.

EXCEPTION: Can be less than 12” for strand mounted terminals, splice cases and other equipment located 8” or more from the centerline of the pole, but not less than 1” with mutual agreement between affected owners.”

ESRB’s findings related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 38 Findings

Location	Findings
66	The communication service is too close to the electrical service
68	The communication service drop is contacting the communication span
77	The communication and electrical service are attached too close on the pole

5. GO 95, Rule 84.6-D, Vertical Runs states in part:

“Runs of bridled conductors, attached to surface of pole, need not be covered provided such runs are below the guard arm and in the same quadrant as the longitudinal cable, or where such runs are below and on the same side of pole with a cable arm and are not in the climbing space, or are connected to service drops which are placed in accordance with the provisions of Rule 84.8–B2b. Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches.”

ESRB’s findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 84.6-D Findings

Location	Findings
96	The communications line is tacked to the pole every four feet

6. GO 95, Rule 84.8-C, Service Drops, Clearances above Ground and Buildings states:

“(1) Above Public Thoroughfares: Vertical clearance shall not be less than 18 feet.

EXCEPTION: Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line. In no case shall the clearance at the center line be less than 18 feet. Where there are no curbs, the foregoing provisions shall apply using the outer limits of normal longitudinal vehicular movement in lieu of a curb line.

(2) Above Private Thoroughfares or Private property:

(a) Industrial and Commercial Premises: Over private driveways, lanes or property accessible to vehicles, service drops shall not be less than 16 feet.

(b) 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.”

ESRB’s findings related to the above rule are listed in Table 12:

Table 12: GO 95, Rule 84.8-C Findings

Location	Findings
07	The communication service is less than 18 feet over the road
25	The communication span is low
31	The communication span is low
35	The communication span is low
40	The communication service is less than 18 feet over the road

Location	Findings
51	The communication line is less than 18 feet over the road
66	The communication service is less than 18 feet over the road
91	The communication service is laying on the roof of the building

7. GO 95, Rule 86.2, Guys, Use states in part:

“Where mechanical loads imposed on poles, towers or structures are greater than can be supported with the safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.

Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire stress, the pole below the point of guy attachment acting merely as a strut.

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.”

ESRB’s findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 86.2 Findings

Location	Findings
23	Guy not properly secured, wrapped around a tree stump
31	The down guy is slack
64	The down guy is slack

8. GO 95, Rule 86.4-C(4), Guys, Clearances, From Conductors, Passing on Same Poles states:

“Where mechanical loads imposed on poles, towers or structures are greater than can be supported with the safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.

The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall be not less than as specified in Table 2, Case 19 except that the clearance between guys and communication messenger and/or cable attached directly to surface of pole may be less than the 3 inches specified in Table 2, Case 19, Column C provided: the guy is not a guy in proximity, or all parts of the guy are not less than 6 feet below 0 - 750 volt supply conductors supported on same pole, and a wood guard or equivalent is placed on the messenger and/or cable; also, a guy attached to a pole which supports supply conductors at a distance of not less than 6 feet above communication messenger and/or cable shall (1) have an insulator placed in the guy above the communication messenger and/or cable, at a distance of not less than 6 feet horizontally from the pole, or (2) have an insulator placed in the guy not less than 3 inches nor more than 6 inches above the messenger and/or cable, and a wood guard or equivalent placed on the messenger and/or cable. ”

ESRB’s findings related to the above rule are listed in Table 14:

Table 14: GO 95, Rule 86.4-C(4) Findings

Location	Findings
06	The communication down guy is too close to the electrical secondary
46	The down guy is contacting the communication line
79	The communication down guy is too close to the communication service

- 9. GO 95, Rule 86.7-B, Location of Sectionalizing Insulators, Anchor Guys** states in part:

“In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule 86.7–B.”

ESRB’s findings related to the above rule are listed in Table 15:

Table 15: GO 95, Rule 86.7-B Findings

Location	Findings
91	Down guy is missing sectionalizer

10. 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 related to the above rule are listed in Table 16:

Table 16: GO 95, Rule 87.7-D(1) Findings

Location	Findings
11	There is an unsecured cable out of the riser
72	Communication line coming out of riser is not secured to the pole

11. GO 95, Rule 91.3 – C, Joint Poles or Poles Jointly Use, Stepping states in part:

“Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.”

ESRB’s findings related to the above rule are listed in Table 17:

Table 17: GO 95, Rule 91.3-C Findings

Location	Findings
07	The pole has a step placed less than eight feet
35	The pole has a step placed less than eight feet

12. 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 related to the above rule are listed in Table 18:

Table 18: GO 128, Rule 17.1 Findings

Location	Findings
09	The communication enclosure is broken

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

“Manholes, handholes, subsurface and self-contained surfacemounted 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 related to the above rule are listed in Table 19:

Table 19: GO 128, Rule 17.8 Findings

Location	Findings
09	The ownership mark is faded
10	No ownership marking
13	No ownership marking

V. Observations

1. GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities states in part:

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property...”

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

“(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 GO 95.”

During the field inspection, ESRB noted the third-party safety concerns listed in Table 20. While in the field, AT&T created and sent third-party notifications to the respective utilities for the items below:

Table 20: Third-Party Observations

Location	Observations
4	Ground wire exposed on electric distribution
08	Cable TV is missing a guy guard on the down guy
10	There is an open Cable TV enclosure
12	Abandoned electrical service
37	There is a communication service drop loosely attached to a building along a public sidewalk
44	Cable TV line is not secured to the pole, loosely supported by a bolt

Location	Observations
66	The Cable TV service is less than 18 feet over the road
70	Electrical service drop too close to communication span
72	Cable TV is missing a guy guard on the down guy and the anchor is pulling out of the ground
80	Cable TV abandoned service drop
91	The electrical ground is exposed
93	The electrical ground is exposed
95	The electrical ground is exposed
101	The electrical ground is exposed