



Ross Johnson
Director

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July 5, 2024

Dear Mr. Daye,

Subject: Audit of AT&T South Orange County Construction Area

The following is AT&T California's ("AT&T") response to your letter dated June 5, 2024 ("June Letter") regarding the Communication Infrastructure Provider Audit of AT&T South Orange County Construction Area ("So. Orange County Audit") from April 22, 2024 to April 26, 2024.

The June Letter requested that we advise you of actions taken by AT&T to address conditions identified during the Safety and Enforcement Division's ("SED's") So. Orange County Audit and requested a response by July 5, 2024.

I am enclosing AT&T's Response to the So. Orange County Audit.

Regards,

A handwritten signature in black ink that reads "R. Johnson".

Ross Johnson
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AT&T Regulatory
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Enclosure:

AT&T's Response to the So. Orange County Audit

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujjiye, Utilities Engineer, ESRB, SED, CPUC

AT&T'S RESPONSE TO THE SO. ORANGE COUNTY AUDIT

I. Field Inspection – Alleged Violations List

Field Inspection Alleged Violation #1: An overbuilt third-party communications conductor span, supported on Pole 2030355E, was sagging, and contacting the AT&T conductor. AT&T did not document and report this safety hazard to the responsible third-party during AT&T's latest inspection.

AT&T Response: AT&T does not agree that this alleged condition was present during the latest inspection. But even if it was present, AT&T disagrees that such alleged condition creates a safety hazard as defined in GO 95, Rule 18.¹ Nevertheless, AT&T has notified COX Communications of this alleged condition pursuant to GO 95, Rule 18A(3) and documented this notice in AT&T's RWM System.

Field Inspection Alleged Violation #2: The following AT&T facilities required maintenance:

- Pole in front of 27899 Silverado Canyon Rd: the attachment point between the down guy anchor and down guy wire supporting AT&T facilities was buried beneath the surface.
- Pole 4778165E: the lashing wire on a conductor span was broken.
- Pole 4778165E: the attachment point between the down guy anchor and down guy wire supporting AT&T facilities was buried beneath the surface.
- Pole 2030355E: a communications cable was dangling from the communications level to the ground, approximately one foot away from the surface of the pole (instead of being secured to the pole).
- Pole 432968E: a communications cable was dangling from the communications level to the ground, with a portion of the cable lying on the ground.
- Pole P129411: a traffic visibility strip was partially detached from the pole.
- Pole Z25292: a riser cover bracket near the base of the pole was partially detached.
- Pole Z25292: the attachment point between the down guy anchor and down guy wire supporting AT&T facilities was buried beneath the surface.
- Pole P211203: two traffic visibility strips were damaged and protruding from the surface of the pole.
- Pole 716133H located at 3117 Kilson Drive: a pole step supported at the public level was damaged.
- Pole 1252822E: a junction box supported at the communications level of the pole was open, exposing the wires and internal connections.

¹ See GO 95, Rule 18 - Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards (providing "For purposes of this rule, 'Safety Hazard' means a condition that poses a significant threat to human life or property.").

- Pole 225936E: AT&T did not transfer its facilities from the previous pole to the new pole, creating the issue of detached risers and an abandoned down guy anchor.
- Pole 207825E: a wound-up section of conductor supported on the pole was attached by temporary rope and left to hang 10 feet above the ground.

AT&T Response: The alleged conditions were entered into AT&T’s RWM System to be worked in the field. The following locations will be addressed by the assigned due date:²

- **Pole in front of 27899 Silverado Canyon Rd: Due on 6/12/2029**
- **Pole 4778165E: Due on 6/12/2029**
- **Pole 4778165E: Due on 6/12/2029**
- **Pole 2030355E: Due on 6/13/2029**
- **Pole 432968E: Due on 6/14/2027**
- **Pole P129411: Due on 6/13/2025**
- **Pole Z25292: Due on 6/13/2029**
- **Pole Z25292: Due on 6/13/2029**
- **Pole P211203: Due on 6/13/2025**
- **Pole 716133H: Due on 6/13/2025**
- **Pole 1252822E: Due on 6/13/2029**
- **Pole 225936E: Due on 6/12/2029**
- **Pole 207825E: Due on 6/12/2029**

Field Inspection Alleged Violation #3: The following AT&T facilities were permanently abandoned and should be removed:

- Pole P126996: two abandoned service drops were wrapped around the pole.
- Pole 4255768E: one abandoned service drop was supported on the pole.
- Pole 2165886E: one abandoned service drop was wrapped around the pole.
- Pole 4298995E: multiple abandoned service drops were hanging from the conductor span near the pole.
- Pole 637131H: one abandoned service drop was wrapped around the pole.

AT&T Response: The alleged conditions were entered into AT&T’s RWM System to be worked in the field. The following locations will be addressed by the assigned due date:

- **Pole P126996: Due 6/13/2029**
- **Pole 4255768E: Due 6/13/2027**
- **Pole 2165886E: Due 6/13/2029**
- **Pole 4298995E: Due 6/13/2029**
- **Pole 637131H: Due 6/12/2029**

² Throughout AT&T’s response, the noted “due” dates are based on entries made in AT&T’s RWM System, which calculates and assigns the due date pursuant to GO 95, Rule 18B(1)(a).

Field Inspection Alleged Violation #4: A conductor span supported on Pole 4778165E was strained and deflected by a tree growing midspan next to the conductor.

AT&T Response: The alleged condition was entered into AT&T's RWM System to be worked in the field. The following location will be addressed by the assigned due date:

- **Pole 4778165E: Due 12/13/2024**

Field Inspection Alleged Violation #5: The communications conductor span supported on Pole 4252143E had a vertical clearance of 15 feet, 8 inches above Modjeska Canyon Road near the intersection with Santiago Cyn Road, which is less than the minimum requirement of 18 feet.

AT&T Response: The alleged condition was entered into AT&T's RWM System to be worked in the field. The following location will be addressed by the assigned due date:

- **Pole 4252143E: Due 6/12/2029**

Field Inspection Alleged Violation #6: The communications conductor span supported on Pole Z25292 was touching a lower communications conductor span not supported on the same pole.

AT&T Response: The alleged condition was entered into AT&T's RWM System to be worked in the field. The following location will be addressed by the assigned due date:

- **Pole Z25292: Due 6/13/2025**

Field Inspection Alleged Violation #7: An AT&T service drop on Pole 637239H was wrapped around a third-party communications service drop at the property in which the service drop was servicing.

AT&T Response: The alleged condition was entered into AT&T's RWM System to be worked in the field. The following location will be addressed by the assigned due date:

- **Pole 637239H: Due 6/13/2029**

Field Inspection Alleged Violation #8: A service drop on Pole 2333775E was touching a span guy wire (at mid-span) supported on the same pole.

AT&T Response: The alleged condition was entered into AT&T's RWM System to be worked in the field. The following location will be addressed by the assigned due date:

- **Pole 2333775E: Due 6/13/2029**

Field Inspection Alleged Violation #9: The down guy wire attached to Pole P252293 that is supporting AT&T facilities on the pole was not taut.

AT&T Response: The alleged condition was entered into AT&T's RWM System to be worked in the field. The following location will be addressed by the assigned due date:

- **Pole P252293: Due 12/12/2024**

Field Inspection Alleged Violation #10: On the pole located in front of 27899 Silverado Canyon Rd., the ground molding was not covering a 2-foot section of ground wire at the public level (approximately four feet above the ground).

AT&T Response: The alleged condition was entered into AT&T's RWM System to be worked in the field. The following location will be addressed by the assigned due date:

- **Pole located in front of 27899 Silverado Canyon Rd: Due 6/12/2027**