



Ross Johnson
Director

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July 11, 2024

Dear Mr. Daye,

Subject: Audit of AT&T East Kern County Construction Area

The following is AT&T California's ("AT&T") response to your letter dated June 11, 2024 ("June Letter") regarding the Communication Infrastructure Provider Audit of AT&T East Kern County Construction Area ("E. Kern County Audit") from May 6, 2024 to May 10, 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") E. Kern County Audit and requested a response by July 11, 2024.

I am enclosing AT&T's Response to the E. Kern County Audit.

Regards,

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

Ross Johnson
Director
AT&T Regulatory
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Enclosure:

AT&T's Response to the E. Kern County Audit

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

AT&T'S RESPONSE TO THE E. KERN COUNTY AUDIT

I. Field Inspection – Alleged Violations List

Field Inspection Alleged Violation #1: The AT&T facilities on each of the following poles were not maintained for their intended use:

- 2334154E – AT&T had a damaged down guy.
- 1354897E – AT&T had a damaged lashing wire.

AT&T Response: The alleged conditions were entered into AT&T's Rehab Work Management System ("RWM System") to be worked in the field. The following locations will be addressed by the assigned due date:¹

- 2334154E – Due on 6/17/2029
- 1354897E – Due on 6/17/2029

Field Inspection Alleged Violation #2: The following AT&T poles had unauthorized attachments:

- 4248174E
- 9823T
- 20919T
- 1190547E
- 1190543E

AT&T Response: AT&T does not agree it is in violation of General Order 95 ("GO 95"), Rule 34. Even if these poles had unauthorized attachments, Rule 34 does not impose a duty on AT&T to routinely or actively remove all unauthorized attachments.² Nevertheless, without admitting that AT&T violated GO 95, Rule 34, the alleged conditions were entered into AT&T's RWM System to be worked in the field. The poles at the following locations will be fielded to determine what, if any, action should be taken by the assigned due date:

- 4248174E - Due on 6/17/2025
- 9823T - Due on 12/17/2025
- 20919T - Due on 6/17/2025
- 1190547E - Due on 6/17/2025
- 1190543E - Due on 6/17/2025

Field Inspection Alleged Violation #3: AT&T service drops attached to each of the following poles were cut, permanently abandoned, and should be removed:

- 4777964E

¹ 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).

² See D.99-04-001, *Opinion Dismissing Complaint*, Case 98-09-036, at 10 (April 1, 1999).

- 1184798E
- 549658E
- 1354897E

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:

- 4777964E - Due on 6/17/2025
- 1184798E - Due on 6/17/2025
- 549658E - Due on 6/17/2025
- 1354897E - Due on 6/17/2025

Field Inspection Alleged Violation #4: The AT&T facilities on the following poles had less than 12 inches of vertical clearance from a communications conductor supported on the same pole:

- Pole 5572T: an AT&T service drop was touching a third-party communications service drop.
- Pole 549661E: an AT&T communications conductor was touching a third-party communications conductor.
- Pole 1162515E: an AT&T service drop was touching a third-party communications conductor.

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 5572T: Due – 12/17/2029
- Pole 549661E: Due – 12/17/2029
- Pole 1162515E Due – 12/17/2029

Field Inspection Alleged Violation #5: A down guy wire supporting Pole number 1070636E was touching an AT&T communications conductor 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:

- 1070636E – Due 12/17/2024

Field Inspection Alleged Violation #6: On the surface of Pole number 294429E, an SCE ground wire was touching an AT&T ground wire.

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:

- 294429E – Due 6/17/2027

Field Inspection Alleged Violation #7: The pedestal at each of the following locations was damaged:

- The pedestal located at 1125 Oakwood Lane in Rosamond, CA
- The pedestal located at 3749 Fernwood Ave. in Rosamond, CA
- The pedestal located at 1017 Barrington Ave. in Rosamond, CA
- The pedestal located at 3306 Mesa Street in Rosamond, CA
- The pedestal located at 3311 Marble Street in Rosamond, CA

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:

- 1125 Oakwood Lane – Due 7/30/2024
- 3749 Fernwood – Due 7/30/2024
- 1017 Barrington – Due 7/30/2024
- 3306 Mesa – Due 7/30/2024
- 3311 Marble – Due 7/30/2024