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July 2, 2024

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

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Volcano Telephone Company's Pine Grove Service Area

Mr. Tse:

Volcano Telephone Company (Volcano) reviewed the results of the CIP audit of Volcano's Pine Grove Service Area conducted March 18, 2024 through March 22, 2024. Volcano's response to the audit findings is enclosed.

If you have any questions concerning Volcano's responses, please contact me at (209)296-1447 or brendas@volcanotel.com.

Sincerely,

Brenda Shepard
Chief Financial Officer
Volcano Telephone Company

Enclosure: Volcano Telephone Company's Response to CPUC CIP Audit Findings

Volcano Telephone Company (U 1019 C)
Response to Electric Safety and Reliability Branch – CIP Audit Results
July 2, 2024

Volcano Telephone Company (Volcano) hereby responds to the Electric Safety and Reliability Branch CIP audit finding of Volcano Telephone Company – Pine Grove Service Area – March 18 through March 22, 2024.

Records Violations

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

1. **GO 95, Rule 21.2, Districts, states in part:**

"D. High Fire-Threat District means those areas comprised of the following:
(1) Zone 1 is Tier 1 of the latest version of the United States Forest Service (USFS) and CAL FIRE's joint map of Tree Mortality High Hazard Zones (HHZs). (Note: The Tree Mortality HHZs Map may be revised regularly by the USFS and CAL FIRE.)
(2) Tier 2 is Tier 2 of the CPUC Fire-Threat Map.
(3) Tier 3 is Tier 3 of the CPUC Fire-Threat Map."

Response: Volcano will incorporate the High Fire-Threat District designations - Tier 1, Tier 2 and Tier 3 – as asset location identifier within its mapping system.

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.

Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate:

- *Type of facility or equipment;*
- *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
- *Accessibility;*
- *Climate;*
- *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*

(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 […]"*

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, Inspection Requirements for Communication Lines states in part:

"A. Patrol and Detailed Inspections

(1) Inspection Requirements for Joint-Use Poles in High Fire-Threat District
In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, 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*

[…]

Inspections in the High Fire-Threat District shall be planned and conducted in accordance with the statewide inspection requirements and procedures described in Rule 80.1-A(2), below.

Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.

(2) Statewide Inspection Requirements

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. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following factors:

- *Fire threat*
- *Proximity to overhead power line facilities*
- *Terrain*
- *Accessibility*
- *Location, including whether the Communications Lines are located in the High Fire-Threat District*

Each company that discovers a safety hazard on or near a communications

facility or electric facility involving another company while performing inspections of its own facilities pursuant to this rule shall notify the other company and/or facility owner of such safety hazard in accordance with Rule 18-A3.Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections. […]

B. Intrusive Inspections in the High Fire-Threat District

Wood poles in Tier 3 of the High Fire-Threat District that support only Communication Lines or equipment shall be intrusively inspected in accordance with the schedule established in General Order 165 if they are: […]

- *Within one span of a joint-use pole supporting supply lines in Northern California […]*

CIPs shall maintain records for the life of the pole that provide the following information for each wood pole subject to this rule: The location of the pole, the date of each intrusive inspection, the results of each inspection, the personnel who performed each intrusive inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff may inspect records consistent with Public Utilities Code Section 314(a)."

Response: Volcano will develop and maintain written pole patrol inspection procedures that follow the requirements outlined in GO 95, Rules 18-B, 31.2 and 80.1. The procedure manual will incorporate, among other requirements, training for pole inspectors, maintain record of inspection within asset record, work orders of corrective action will follow prescribed due dates with completion along with Volcano's normal completion timeframe of weeks, not years.

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."

Volcano lacks a written maintenance program that factors in requirements for High Fire-Threat Districts (HTFD). The Fire-Threat Map and Geographic Information System data can be found on the CPUC's "Fire-Threat Maps and Fire-Safety Rulemaking" website[1] and the data must be incorporated into the maintenance program for Volcano's entire service territory.

As a result of Volcano not including HTFD data into its maintenance program, ESRB identified that many maintenance requirements such as patrol inspections, detailed inspections, intrusive inspections, and work order prioritization are not being performed in accordance with GO 95, as detailed in the following sections below:

Response: Volcano will incorporate HTFD data into a maintenance program through the development of an inspection and maintenance practice and procedure manual.

Patrols and Detailed Inspections

Volcano lacks written procedures detailing how often it conducts inspections of its Communication Lines to comply with GO 95, Rule 80.1-A.(1) and (2). Volcano's current Overhead Maintenance Policies[2] is a single sentence that states there is a spring construction crew that inspects and brushes one of three major aerial lines annually. The current procedure does not ensure that all Communication Lines are subject to their required Patrol and Detailed Inspection intervals.

In response to the Pre-Audit Data Request Item #2, Statistics[3], Volcano indicated its overhead facilities are attached to 464 poles in the Pine Grove Service Area. ESRB reviewed the provided inspection records between January 1, 2019, through January 1, 2024[4], and identified that only 179 poles were inspected during this five-year timeframe. Because Volcano does not distinguish the HFTD location for all of its poles and the list did not distinguish if the inspections were patrol inspections or detailed inspections, ESRB could not determine if Volcano is conducting its patrols and detailed inspections in accordance with GO 95, Rule 80.1-A.(1) requirements.

Response: Volcano will establish a written patrol and detail inspection process in accordance with GO95, Rule 80.1-A.(1) requirements.

Intrusive Inspections

Volcano did not provide evidence that it intrusively inspects its applicable wood poles in accordance with GO 95, Rule 80.1-B intervals. Following the audit, Volcano identified it has seven solely owned wood poles in Tier 3 HTFD in its Pine Grove Service Area[5]. Four of these poles are older than 15 years old and may be due for intrusive inspections if they meet the requirements in GO 95, Rule 80.1-B.

Response: Volcano will incorporate the High Fire-Threat District designations - Tier 1, Tier 2 and Tier 3 – as asset location identifier within its mapping system. This will allow Volcano to identify the poles requiring an intrusive inspection.

Work Order Prioritization

Volcano does not have consistent practices for prioritizing its overhead and underground corrective work orders. In the work order list provided in the pre-audit data request[6], Volcano includes Assigned Corrective Action Due Dates; however, these due dates are inconsistent and

do not have any perceived prioritization. For example, Volcano created Work Order "V01-18-00754" on November 27, 2018, for a "bad service drop" in a Tier 2 HFTD and assigned 65 days to complete the work with a due date of January 31, 2019. Volcano had another similar Work Order "V01-19-00105" for a "bad service drop" in a Tier 2 HFTD, which was identified on February 12, 2019, and assigned 15 days to complete the work with a due date of February 28, 2019. Although both Work Order examples were for replacing bad service drops in Tier 2 HFTD, they were assigned inconsistent timeframes to complete the work.

Similarly for its underground facilities, Volcano created Work Order "V01-21-00416" on July 3, 2021, to repair a damaged underground service in a Tier 2 HFTD and assigned 880 days to complete the work with an assigned due date of November 30, 2023.

ESRB notes that nearly all the Assigned Corrective Action Due Dates coincidentally coincided with the Corrective Action Completion Date.

Volcano's lack of prioritizing violations and safety hazards was noted 13 years ago in the Programmatic Violations in ESRB's 2011 Audit of Volcano Communications, audit number CA2011-003. In Volcano's response to this violation, Volcano indicated it resolved this issue by creating "new pole/pole support reports." However, ESRB did not find evidence that shows Volcano appropriately prioritizes its work orders for correcting violations and safety hazards. Volcano must follow the timeframes in GO 95, Rule 18-B for its overhead work orders.

Response: Volcano will establish an auditable maintenance program incorporating prioritizing corrective actions consistent with the priority levels identified in GO 95, Rule 18-A. The due date for corrective action work orders will assigned according to Rule 18-A prioritization levels.

2. **GO 128, Rule 42.2, Manholes and Handholes, Maintenance and Inspection** states:

   "See Rules 12.2 and 17.2."

   GO 128, Rule 12.2, Maintenance states:

   "Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules."

   GO 128, Rule 17.2, Inspection states:

   "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 (See Rule 12.3)."

In Volcano's response to the Records Review Violations in ESRB's 2016 Audit of Volcano Communications, audit number CA2016-013, Volcano indicated it "implemented a Pull Box Inspection process similar to its pole and aerial check sheet." Eight years later during this audit in 2024, Volcano could not provide evidence it was completing these underground Pull Box

Inspections.

Furthermore, Volcano's Underground Maintenance Policies[7] do not reflect the implementation of the Pull Box Inspections. The current policy only describes the inspection and cleaning of remote switch locations. If the Pull Box Inspections are part of Volcano's routine underground maintenance and inspection program, Volcano must document this practice in its procedures.

Response: Volcano's Underground Maintenance Policies will be updated to include Pull Box inspections and maintenance procedures.

3. **GO 95, Rule 80.1-A.(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District** and **GO 95, Rule 80.1-A.(2), Statewide Inspection Requirements** both state in part:

> *"Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections."*

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.*

As noted in Volcano's response to Pre-Audit Data Request Item #5, Training Program[8], Volcano lacks a formal training program for GO 95 and GO 128 inspections. Volcano must develop procedures so it can educate its inspectors about problems that should be identified during both overhead and underground inspections.

Response: Volcano will establish a formal training program for GO 95 and GO 128 inspections. The training program will be included in the written inspection and maintenance procedure manual for pole, overhead and unground facilities.

4. **GO 95, Rule 80.1-A.(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District** and **GO 95, Rule 80.1.A.(2) Statewide Inspection Requirements** both state in part:

> *"Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections."*

GO 95, Rule 80.1-A.(3) Definitions, Patrol Inspections states:

> *"For the purpose of this rule, Patrol Inspection shall be defined as a simple visual inspection, of applicable communications facilities equipment and structures that is designed to identify obvious structural problems and hazards. Patrol inspections may be carried out in the course of other company business."*

Patrol inspections, defined in Rule 80.1-A.(3), require a checklist that specifies problems that inspectors should identify. Volcano did not have a checklist for performing patrol inspections. Following the audit, Volcano created a checklist for its patrol inspections[9].

Response: Volcano will incorporate the checklist for patrol inspections in a written inspection and maintenance procedure manual.

5. **GO 95, Rule 80.1.A.(4) Record Keeping** states:

> *"Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a)."*

The inspection records[10] that Volcano provided in the Pre-Audit Data Request do not record the personnel who performed the inspection. Additionally, Volcano indicated that it only creates work orders for corrective actions that require the use of materials. Minor violations that are identified during its inspections are corrected on the spot and are not documented. These same issues were noted 13 years ago in the Programmatic Violations in ESRB's 2011 Audit of Volcano Communications, audit number CA2011-003, and still have not been corrected.

Response: Volcano will adhere to GO 95, Rule 80.1.A(4) record keeping guidelines. Volcano will incorporate GO 95, Rule 80.1.A.(4) record keeping requirements into an inspection and maintenance procedure manual.

I. 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
16	The service drop's outer shielding is broken.
51	Volcano needs to transfer its facilities to the new pole.
72	Volcano needs to transfer its facilities to the new pole.
73	Volcano needs to transfer its facilities to the new pole.

Response: Location 16 – corrected
Location 51 – Work order V01-24-00240 due date 3/21/2027
Location 72 – Work order V01-23-00480 due date 9/18/2028
Location 73 – Work order V01-23-00578 due date 11/14/2028

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
14	There is an abandoned telephone service drop.
70	There is an abandoned telephone service drop.

Response: Location 14 – Corrected, abandoned telephone service drop removed.
Location 70 – Corrected, abandoned telephone service drop removed.

3. **GO 95, Rule 38, Table 2, Case 16-C** requires the following:

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

   ESRB's finding is listed in Table 3:

Table 3: GO 95, Rule 38, Table 2, Case 16-C Finding

Location #	Finding
11	Volcano's span is contacting AT&T's span.

Response: Location 11 – work order V02-24-00241 due date 3/19/2027.

4. **GO 95, Rule 84.4-A(6), Clearances, Across or along Public Thoroughfares** states:

   "Communication conductors over or across public thoroughfares shall have a clearance of 18 feet above ground (Table 1, Case 3, Column B). A reduced clearance to 16 feet is permitted for the portions of communication conductors where no part of the line overhangs any part of the thoroughfare which is ordinarily traveled, or where the line is behind an established curb, ditch or berm that serves to protect such communication conductors from encroachment by vehicular traffic."

   ESRB's findings are listed in Table 4:

Table 4: GO 95, Rule 84.4-A(6) Findings

Location #	Findings
10	The phone span is only 17' 8" above ground at the center of the road.
43	The cable span is only 17' 5" above ground at the center of the road.
46	The cable span and service drop are only 17' 9" above ground at the center of the road.

Response: Location 10 – Work order V02-24-00241 due date 3/19/2027

Location 43 – Corrected
Location 46 – Corrected

5. **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 finding is listed in Table 5:

Table 5: GO 95, Rule 84.6-B Finding

Location #	Finding
43	The wooden ground molding does not completely cover the ground wire at a section about one foot from the ground surface.

Response: Location 43 – Corrected.

6. **GO 95, Rule 84.8-C(2)(b), Service Drops, Clearances above Ground and Buildings, Above Private Thoroughfares or Private property** states:

"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 this12 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 finding is listed in Table 6:

Table 6: GO 95, Rule 84.8-C(2)(b) Finding

Location #	Finding
71	The service drop is only 9' 9" above the customer's driveway.

Response: Location 71 – Corrected

7. **GO 95, Rule 86.2, Use** 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."*

ESRB's findings are listed in Table 7:

Table 7: GO 95, Rule 86.2 Findings

Location #	Findings
49	The anchor guy is loose.
Location #	Findings
50	The overhead span guy is loose. Volcano indicated that both poles on this span are scheduled to be replaced by PG&E.
62	The anchor guy is loose.
75	The anchor guy is loose.

Response: Location 49 – Corrected.
Location 50 – Work order V01-2300296 due date 6/9/2028 (PGE to replace pole before re-sagging guy.
Location 62 – Corrected.
Location 75 – Corrected.

8. **GO 95, Rule 86.7-B, 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 are listed in Table 8:

Table 8: GO 95, Rule 86.7-B Findings

Location #	Findings
19	Vegetation is contacting the anchor guy above the sectionalizing insulator.
69	Vegetation is contacting the anchor guy above the sectionalizing insulator.

Response: Location 19 – Corrected.
Location 69 – Corrected.

9. **GO 95, Rule 87.4-C(3), Clearances, Between Conductors and Cables, Attached to Poles**
states in part:

> *"Cables or messengers where attached to the surface of poles which support supply conductors, shall not be less than 6 feet vertically below the level of supply conductors.*
>
> > *EXCEPTION: This minimum clearance of 6 feet may be reduced to not less than 4 feet below supply conductors of 0 - 750 volts provided a guard arm is placed above the messenger and cable (or self–supporting cable) in accordance with the provision of Rule 87.7–B (see Rule 21.0–D for guard arm definition). No cable or messenger shall be attached to the surface of such a pole less than 2 feet below the lowest level of communication conductors on crossarms unless a minimum horizontal separation of 30 inches is maintained between the messenger or cable and the communication conductors on the opposite side of pole."*

ESRB's finding is listed in Table 9:

Table 9: GO 95, Rule 87.4-C(3) Finding

Location #	Finding
10	The phone span is attached above the guard arm and is less than six feet below the overhead transformer's supply conductors.

Response: Location 10 – Work order V02-24-00241 due date 3/19/2027.

10. **GO 95, Rule 87.7-D(1), Risers** states:

> *"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:

(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 10:

Table 10: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
19	The riser cables are coming out of the metallic riser cover.
53	The metallic riser cover protected only 7' 1" of the riser above ground.
67	The plastic riser guard protects only about 4' of the riser above ground.

Response: Location 19 – Corrected.
Location 53 – Corrected.
Location 67 – Corrected.

11. GO 95, Rule 91.3-C, Stepping states:

"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 finding is listed in Table 11:

Table 11: GO 95, Rule 91.3-C Finding

Location #	Finding
46	The lowest pole step is only 7’ 6” from the ground line.

Response: Location 46 – Estimated correction date 7/12/2024.

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.”*

ESRB’s findings are listed in Table 12:

Table 12: GO 128, Rule 17.1 Findings

Location #	Findings
1	The bonding ground wire had disconnected from the amplifier’s grounding lug. Volcano immediately reattached the bond during the audit.
3	The amplifier is not bonded to the ground rod.
10	The power inserter has sharp nails protruding about two inches out of the enclosure. Volcano immediately trimmed down the nails to remove the hazard.
12	The power inserter’s ground rod is exposed above ground.
15	The amplifier is not bonded to the ground rod.
55	The amplifier is not bonded to the ground rod.
56	The power inserter’s ground rod is exposed above ground.
77	The amplifier is not bonded to the ground rod.

Response: Location 1 – Corrected.
Location 3 – Corrected.
Location 10 – Corrected.
Location 12 – estimated correction date 7/12/2024.
Location 15 – estimated correction date 7/12/2024.
Location 55 – estimated correction date 7/12/2024.
Location 56 – estimated correction date 7/12/2024.
Location 77 – estimated correction date 7/12/2024.

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 surface mounted 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 are listed in Table 13:

Table 13: GO 128, Rule 17.8 Findings

Location #	Findings
2	The surface-mounted communication power inserter is not marked with any ownership identification.
8	The surface-mounted communication power inserter is not marked with any ownership identification.
10	The surface-mounted communication power inserter is not marked with any ownership identification.

Response: Location 2 – estimated correction date 7/12/2024.
Location 8 – estimated correction date 7/12/2024.
Location 10 – estimated correction date 7\12/2024.

14. **GO 128, Rule 43.3-C, Depths** states:

"Communication cables shall be installed at a minimum depth below the surface under which they are located as follows except as provided in Rule 43.3–D:

(1) Sidewalks, Parkways and Private Property: 12 inches."

ESRB's findings are listed in Table 14:

Table 14: GO 128, Rule 43.3-C Findings

Location #	Findings
7	The phone cable is not buried and is running across the ground surface. This condition was previously reported to Volcano on July 28, 2022, in the 3rd Party Notification 124171867.
69	A section of the underground cable is no longer buried and is exposed above ground.

Response: Location 7 – Work order V01-24-00119 due date 7/28/2025
Location 69 – Corrected.