



February 5, 2025

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California Public Utilities Commission

SUBJECT: Communication Infrastructure Provider (CIP) Audit of TDS Telecom - Happy Valley

To all:

This letter is in response to the CIP audit of TDS Telecom's Happy Valley service area from November 12, 2024 through November 15, 2024. During the audit, ESRB staff conducted field inspections of TDS's communications facilities and reviewed pertinent documents and records. As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). The response to each of those items is below:

- 1. GO 95, Rule 80.1-A(1), Inspection Requirements for Joint-Use Poles in High Fire Threat District.** *"With the exception of implementations instructions set forth in Ordering Paragraphs 2 and 3, the new amended regulations adopted by today's Decision that apply to Zone 1, Tier 2, and/or Tier 3 of the High Fire Threat District shall be: Fully implemented in Tier 3 statewide by September 1, 2018, including full requirements pertaining to frequency of inspections ... ii. Fully implemented in Tier 2 statewide by June 30, 2019, including full requirements pertaining to frequency of inspections ..."* Please provide ESRB with TDS's updated pole detailed inspection and patrol inspection program.

Response: Happy Valley's service area is located in Tier 2 HFTD; none of the area is located in Tier 3 HFTD. With this clarification, TDS has added a policy to perform a patrol of aerial plant, including poles, every 2 years. The local Field Service Manager will maintain records of the patrols including patrol date, findings and corrective action if needed. TDS will continue inspections every 10 years tracked in NRBV.

- 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." Please provide ESRB with TDS's updated underground detailed inspection and patrol.



Response: TDS has added a policy to perform a patrol of underground facilities, every 2 years. The local Field Service Manager will maintain records of the patrols including patrol date, findings and corrective action if needed.

- GO 95, Rule 80.1-B, Intrusive Inspections in the High Fire-Threat District states in part:** *“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:* • *Interset between joint-use poles supporting supply lines in Southern California.* • *Within three spans of a joint-use pole supporting supply lines in Southern California.* • *Within one span of a joint-use pole supporting supply lines in Northern California.”* Please verify if TDS owns poles in the Tier 3 HFTD and provide ESRB a list of TDS owned poles in the Tier 3 HFTD. If TDS owns poles in the Tier 3 HFTD that are within one span of joint-use poles supporting supply lines, TDS must implement an intrusive inspection procedure per GO 95, Rule 80.1-B.

Response: N/A. Happy Valley’s service area is located in Tier 2 HFTD; none of the area is located in Tier 3 HFTD.

Field Inspection:

- 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.”*

Response: The ESRB observed 2 violations where the ownership sign was missing and 6 violations where the ownership sign was faded. TDS will order and replace/add TDS stickers to all TDS equipment no later than August 1, 2025.

If you have questions or need additional information, I can be reached at either gail.long@tdstelecom.com or 608-664-2923 to discuss.

Sincerely,

/s/

Gail Long, Sr. Manager State Government Affairs

Cc: Michael Brinkley - Michael.Brinkley@tdstelecom.com