PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

June 10, 2024 CA2024-1175

Lisa Ludovici
Director, Government Affairs – Central and Northern California
Charter Communications (Charter)
270 Bridge Street
San Luis Obispo, CA 93401

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Charter's Tulare County Region

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Joe Murphy and Gordon Szeto of ESRB staff conducted a CIP audit of Charter's Tulare County Region from February 12, 2024 through February 16, 2024. During the audit, ESRB staff conducted field inspections of Charter's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations is enclosed.

Please provide a response no later than July 11, 2024, via electronic copy of all corrective actions and preventive measures taken by Charter to correct the identified violations and prevent the recurrence of such violations and observations.

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 Joe Murphy at (415) 308-4159 or muj@cpuc.ca.gov.

Sincerely,

Rickey Tse, P.E.

Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC Audit Findings of Charter Tulare County Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Joe Murphy, Utilities Engineer, ESRB, SED, CPUC
Gordon Szeto, Utilities Engineer, ESRB, SED, CPUC
Ryan Lindsay, Senior Manager, Construction, Charter Communications

CHARTER TULARE COUNTY REGION
COMMUNICATIONS AUDIT FINDINGS
FEBRUARY 12-16, 2024

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Charter's Tulare County Region:

- Facility statistics as of November 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 November 2023.
- Current and previous versions of wired and wireless, OH and UG maintenance policies, procedures, and programs, that were effective from November 2018 through November 2023 for compliance with GOs 95 and 128.
- Current inspector training program for compliance with GO 95 and 128.
- Patrol and detailed inspection records containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings and repairs from November 2018 through November 2023.
- Work orders records for wired and wireless, OH and UG facilities containing data for inspected facility type, facility location, fire threat district location, repair, due date and completed date from November 2018 through November 2023.
- Safety Hazards Notifications sent to third-party utilities from November 2018 through November 2023.
- Safety Hazards Notifications received from third-party utilities from November 2018 through November 2023.
- Pole loading calculations for Tier 2 and Tier 3 High Fire Threat Districts from November 2022 through November 2023.
- Intrusive test records for the CIP facilities in Tier 2 and Tier 3 High Fire Threat Districts from November 2022 through November 2023.
- New construction projects from November 2022 through November 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."*

GO 95, Rule 80.1-A(4), Record Keeping states in part:

> *"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..."*

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."*

Charter states in B.0 CPUC Inspection Program North West Region - Northern CA, *"Charter will complete a structured patrol of all underground and aerial plant that is not in the Fire-Threat Areas every 20 years."* [1]

ESRB notes that Charter's Tulare County Region has 9,297 ariel and 14,161 underground facilities, (23,458 total) in non-HFTD Tier 2 or 3 areas. [2]

Charter provided three databases documenting patrol and detailed inspection activity in the Tulare County region:

[1] Charter's CPUC Inspection Compliance Program, Charter Communications – North West Region – Northern B.0 CPUC Inspection Program North West Region - Northern CA, Rev: 06/12/18, In effect 6/30/2019.
[2] Charter provided a revised response to Pre-Audit Data Request Response to Questions 2: Area Miles and Structures Tulare County 2024 Audit.1 Rev20240212. Analysis here is based on Charter's revised response.

- Spida Data - Patrol_Detail_3rd Party 1-19-24 (records starting in May 2021).[3]
- Prism Data Base_Patrol_Tulare County [4]
- PRISM Completed Nov 2018-Nov 2023 [5]

ESRB reviewed each of these databases and noted the following number of inspections of facilities in non-HFTD areas. See Table 1.

Table 1: Tulare County Region Prism Non-HFTD Total Records, November 2018 – November 2023

Source	Non-HFTD [6]
Spida Data - Patrol_Detail_3rd Party 1-19-24	43 [7]
Prism Data Base_Patrol_Tulare County	738 [8]
PRISM Completed Nov 2018-Nov 2023	1,499 [9]
Total	2,280

2,280 is the sum of the patrol inspections entered in the three databases, but the number of unique inspections cannot be determined for the two Prism databases. The number of unique inspections is less than 2,280. The two Prism databases appear to only record work done at a particular site/facility and do not record the results of each inspection as required by GO 95, Rule 80.1-A(4). Additionally, with less than 2,280 unique facility patrol inspections over a 5-year period, the data does not suggest that Charter can inspect all 23,458 facilities in the required 20-year window. Charter should update its plan on completing patrol inspections in the non-HFTD areas in Tulare County Region.

2. **GO 95, Rule 80.1-A(4), Record Keeping** states in part:

> *"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..."*

[3] Response to Q06, 08, & 09, Spida Data - Patrol_Detail_3rd Party 1-19-24.
[4] Response to Q07, Prism Data Base_Patrol_Tulare County
[5] Response to Q12, PRISM Completed Nov 2018-Nov 2023
[6] Charter identifies Non-HFTD as High Fire Threat "1" in the Prism databases and No in the Spida database.
[7] Spida categories used to identify non-HFTD: "Start 19 Year Countdown" (Status): 14, "No" (Fire Threat): 31. Two records appeared in both searches resulting in 43 unique locations: May 2021 to November 2023.
[8] Records from November 2018 to November 2023 with Fire Threat of 1. The number of unique inspections cannot be determined but is less than 738 due to multiple entries at a single location.
[9] Records from November 2018 to November 2023 with Fire Threat of 1. The number of unique inspections cannot be determined but is less than 1,499 due to multiple entries at a single location.

The two Prism databases do not identify the location of each facility inspected, the results of each inspection, nor the personnel involved with the inspection of facilities as required by GO 95, Rule 80.1-A(4).

3. **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

Based on Charter's Area Miles and Structures Report for Tulare County, the region has 1,072 ariel structures in Tier 2 areas. Charter's Tulare County region does not contain HFTD Tier 3 areas. Tulare County Region Spida Data - Patrol_Detail_3rd Party 1-19-24 patrol and detailed inspection records from May 2021 through November 2023 shows 3,315 detailed inspections and 1 patrol inspection. Of the 3,316 inspections, there were 2,334 unique pole numbers. [10]

ESRB was unable to reconcile the difference between the 1,072 ariel structures in HFTD Tier 2 areas reported in Charter's Area Miles and Structures Report and the 2,334 unique pole numbers identified as located in HFTD Tier 2 areas in the Tulare County Region Spida Data, and therefore, unable to determine if Charter inspected poles in Tier 2 area in compliance with GO 95, Rule 80.1-A(1).

Due to the data issues noted above, ESRB was unable to systematically review all records for compliance with GO 95, Rule 80.1-A(1). ESRB selected sites for compliance inspection through a review of the records supplied. ESRB found records where HFTD Tier 2 inspections were either late or past due. Late inspections are any subsequent inspections completed after the required interval. Past due inspections are inspections where the most recent inspection is overdue (past the required interval) as of November 30, 2023, the closing date of the record review. Table 2 lists the most past due inspections.

[10] Charter Pre-Audit Data Request Responses to Questions 06, 08, and 09: Spida Data - Patrol_Detail_3rd Party 1-19-24.

Table 2: Tulare County Region Select Late or Past Due Inspections

HFTD Tier	Location, Identifier	Spida Detailed Inspection Date[11]	Prism Patrol Inspection Date[12]	Prism Completion Inspection Date[13]	Days Late/ Past Due
2	Pierpoint Dr. E/S 130' E/O Hwy 190, Camp Nelson Pole 4276604E	5/10/2021	No Record	No Record	92 [14]
2	3419 Wilson Dr, Springville Prism 4768039	No Record	8/1/2023	8/1/2023	942 [15]
2	34812 Hwy 190, Springville Prism 1181394	1/16/2024	No Record	3/7/2019	926 [16]

4. **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 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."

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

[11] Ibid.
[12] Charter Pre-Audit Data Request Response to Question 07: Prism Data Base_Patrol_Tulare County
[13] Charter Pre-Audit Data Request Response to Question 12: PRISM Completed Nov 2018-Nov 2023
[14] As of November 30, 2023.
[15] Calculated from November 1, 2018
[16] Inspection due 7/1/2021

"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."

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

"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 require a checklist that specifies problems that inspectors should identify. Charter did not provide sufficient evidence that it has a checklist for patrol inspections. Charter provided ESRB the SCTE - GO95 Presentation[17] used for inspection training; however, Charter must also develop a checklist for its patrol inspections that inspectors can use to identify obvious structural problems and hazards.

[17] SCTE - GO95 Presentation, G.O.95 Presentation for Communication Aerial Facilities and Service Drops

5. **General Order (GO) 95, Rule 31.1, Design, Construction and Maintenance,** states in part:

> *"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 communication or supply lines and equipment."*

GO 95, Rule 18-A1: Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

> *"Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities."*

ESRB's review of Charter's Tulare County Region work orders from May 2021 through November 2023 found that 721 work orders that Charter either closed late or were late and pending completion.[18] 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 November 30, 2023 but were not complete by that date. Table 3 breaks down the total late and past due work orders for the Tulare County Region.

Table 3: Tulare County Region Late Closed and Pending Work Orders

Late Closed Work Order	Late Pending Work Order	Total
685	36	721

Table 4 lists the most late and overdue closed work orders.

[18] ESRB analysis of Charter Pre-Audit Data Request Responses to Questions 06, 08, and 09: Spida Data - Patrol_Detail_3rd Party 1-19-24. This only covers the period from May 2021, the oldest records in the Spida database. Charter also supplied patrol and completed records from Charter's Prism database but these records do not contain work order due date so ESRB could not evaluate compliance with due dates.

Table 4: Tulare County Region Most Late and Overdue Work Orders

Priority Level	Latest Repair Address	Due Date/ Closed Date	Days Late/ Past Due
2	35980 CA 190 Springville CA 93265 Pole AN	1/15/2022/ 1/17/2024	732
2	38059 Rio Vista Dr Springville CA 93265 Pole 48168448E	4/28/2022/ 1/17/2024	629
2	33615 Globe Dr Springville CA 93265 Pole 2229815E	5/16/2022/ Past Due	563

6. **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(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."*

ESRB reviewed Charter's Tulare County Region patrol records from November 2018 through November 2023 [19] and found 20 records (14 unique records) where the listed HFTD Tier level was not accurate based on the noted latitude and longitude. The Charter records noted a lower HFTD level (non-HFTD or High Fire "1") than identified by the CPUC High Fire Threat District (HFTD) Map. Facility HFTD tier level assignments must be accurate and are necessary to determine their inspection and repair intervals. Table 5 provides an example of records where Charter recorded HFTD that did not accurately reflect the correct HFTD level.

[19] Prism Data Base_Patrol_Tulare County and PRISM Completed Nov 2018-Nov 2023

Table 5: Incorrectly listed HFTD Tier Level

Prism ID	Project Name	Source[a]	Latitude	Longitude	Fire Threat[b]	HFTD Tier[c]
684563	1036 Creekmont Ct[20]	P	34.29108	-119.202194	1	2
1569463	Street Crossing	B	36.102112	-118.865067	1	2
1677934	Cable Replacement	B	36.136887	-118.769958	1	2
1682788	Por Cale Replacement	B	36.478149	-118.920265	1	2
1824921	Plant Replacement	B	36.090881	-118.810417	1	2
1895660	<Name>[21]	C	36.051964	-118.935463	1	2
2112648	Por-Plant Replace-CN001	B	36.142277	-118.609787	1	2
2289159	<Name>	C	36.048584	-118.926163	1	2
2353709	DB Street Cross - Hwy 190	B	36.047897	-118.926773	1	2
2389190	14200 Road 284 Porterville	C	36.050244	-118.932488	1	2
2641817	<Name>	C	36.079998	-118.990288	1	2
2922137	<Name>	C	36.079937	-118.990204	1	2
3729612	<Name>	C	36.047131	-118.927254	1	2
4753071	<Name>	C	36.102127	-118.864479	1	2

a: P: Prism Data Base Patrol, C: PRISM Completed, B: both.
b: Fire Threat as listed in the Charter Prism database.
c: HFTD Tier based on latitude/longitude from CPUC High Fire Threat District (HFTD) Map

7. General Order (GO) 95, Rule 18-B, Maintenance Programs states 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."*

Charter did not provide formal written auditable procedures that describe the qualifications of inspectors to ensure that all its communication lines are in compliance with GO 95 and GO 128. ESRB acknowledged that Charter has provided both a narrative of inspector qualifications and a copy of its SCTE - GO95 Presentation[22]; however, Charter must also develop required training and maintain training records that can be audited.

[20] Street address and lat/long indicate this record is located in Ventura County in an HFTD Tier 2 area. The city (Exeter) and county (Tulare) indicate that the facility is in the Tulare County region.
[21] Prism record Project Name listed either an employee or customer name. <Name> replaces the actual name listed in the database.
[22] Charter's Post Audit Data Request Response dated March 21, 2024.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities listed in Table 6:

Table 6: Locations of Tulare County Region Field Inspection

Loc#	Struct Type	Address	City	Lat	Long
1	OH	42433 Sierra Dr.	Three Rivers	36.45103889	-118.8967583
2	OH	42486 Sierra Dr.	Three Rivers	36.45113889	-118.8963611
3	OH	42504 Sierra Dr.	Three Rivers	36.45126667	-118.8960889
4	OH	42494 Sierra Dr.	Three Rivers	36.45135833	-118.8958972
5	OH	42504 Sierra Dr.	Three Rivers	36.45145	-118.895775
6	OH	43175 Sierra Dr.	Three Rivers	36.45691944	-118.8866361
7	OH	43280 Sunset Dr.	Three Rivers	36.45665278	-118.8867806
8	OH	43177 Sunset Dr.	Three Rivers	36.45724167	-118.8868333
9	OH	43232 Sunset Dr.	Three Rivers	36.45763056	-118.8869694
10	OH	43175 B Sierra Dr.	Three Rivers	36.45716944	-118.8855056
11	OH	43174 Sierra Dr.	Three Rivers	36.45707778	-118.8850694
12	OH	43765 Dinely Dr.	Three Rivers	36.46036667	-118.8743222
13	Pad	43766 Dinely Dr.	Three Rivers	36.46040833	-118.8743667
14	OH	43788 Dinely Dr.	Three Rivers	36.46062778	-118.8741444
15	OH	43716 Dinely Dr.	Three Rivers	36.4599	-118.8748472
16	OH	43715 Dinely Dr.	Three Rivers	36.45944722	-118.8751611
17	OH	43714 Dinely Dr.	Three Rivers	36.45908056	-118.8756778
18	OH	43710 Dinely Dr.	Three Rivers	36.45845833	-118.8773028
19	OH	36542 Road 197	Woodlake	36.45126667	-119.1326
20	OH	36426 Road 197	Woodlake	36.45183056	-119.132575
21	OH	36570 Road 197	Woodlake	36.45256389	-119.1325444
22	OH	Road 197 x Ave. 364	Woodlake	36.45004167	-119.1325833
23	OH	19690 Ave. 364	Woodlake	36.44994722	-119.1326444
24	OH	Ave. 364	Woodlake	36.45003611	-119.1322028
25	OH	Ave. 364	Woodlake	36.44934167	-119.1304694
26	UG	115 King Ct.	Exeter	36.30160556	-119.1454861
27	UG	113 King Ct.	Exeter	36.30160278	-119.1451111
28	OH	1100 S. Harvard Ave.	Lindsay	36.18832778	-119.0821
29	OH	1150 S. Harvard Ave.	Lindsay	36.188	-119.0821111
30	OH	1174 S. Harvard Ave.	Lindsay	36.18756111	-119.0821694
31	Ped	583 W. Bel Aire Ln.	Porterville	36.08274167	-119.0303944
32	Ped	573 W. Bel Aire Ln.	Porterville	36.08266389	-119.0302417
33	Ped	543 W. Bel Aire Ln.	Porterville	36.08256111	-119.0295861
34	Ped	933 Howland Pl.	Porterville	36.08286389	-119.0296944
35	Ped	953 Howland Pl.	Porterville	36.08315278	-119.0297389
36	OH	1197 W. Putnam Ave.	Porterville	36.06949722	-119.0440306
37	OH	1221 W. Putnam Ave.	Porterville	36.06948889	-119.0445639
38	OH	1241 W. Putnam Ave.	Porterville	36.06957222	-119.0450833
39	OH	1259 W. Putnam Ave.	Porterville	36.06938889	-119.0454556
40	Ped	450 W. Springville Ave. at Jaye Ave.	Porterville	36.05502778	-119.026475

Loc#	Struct Type	Address	City	Lat	Long
41	Ped	450 W. Springville Ave. #137	Porterville	36.05498889	-119.0274806
42	Ped	485 W. Joan Ave.	Porterville	36.04671389	-119.0276722
43	Ped	483 Richard Ave.	Porterville	36.04703056	-119.0279083
44	Ped	493 Richard Ave.	Porterville	36.04718889	-119.0280611
45	Ped	509 Richard Ave.	Porterville	36.04725	-119.02845
46	Ped	517 Richard Ave.	Porterville	36.04728333	-119.0292583
47	Ped	535 Richard Ave.	Porterville	36.04726111	-119.0292667
48	Ped	543 Richard Ave.	Porterville	36.04732778	-119.0295194
49	Ped	559 Richard Ave.	Porterville	36.047325	-119.0303922
50	Ped	567 Richard Ave.	Porterville	36.04726389	-119.0300222
51	OH	2286 E. Clea Ave.	Porterville	36.05620556	-118.9797222
52	OH	2308 Crabtree Ave.	Porterville	36.05858333	-118.9682222
53	OH	2292 Crabtree Ave.	Porterville	36.05864444	-118.9680639
54	OH	2310 Crabtree Ave.	Porterville	36.05876111	-118.9681333
55	OH	16 Fairway Dr.	Porterville	36.06572778	-119.0019694
56	OH	Fairway Dr. x E. Olive Ave.	Porterville	36.065675	-119.0025111
57	OH	15 Fairway Dr.	Porterville	36.06579722	-119.0033417
58	OH	N. Park Dr. x E. Olive Ave.	Porterville	36.06568889	-119.0033111
59	OH	28 S. Corona Dr.	Porterville	36.06573056	-119.0039056
60	OH	41 N. Corona Dr.	Porterville	36.06546111	-119.0038222
61	OH	23375 Ave. 56	San Lorenzo	35.89121667	-119.0498417
62	OH	23376 Ave. 56	Ducor	35.89113889	-119.0495444
63	OH	23395 Mt Whitney Ave.	Ducor	35.893475	-119.0490028
64	OH	Ave. 56 x Rd. 234	Ducor	35.89119722	-119.0490111
65	OH	5610 Rd. 234	Ducor	35.89226667	-119.0487889
66	OH	23444 Ave. 56	Ducor	35.89239167	-119.0481028
67	OH	23999 Parsons Ave.	Ducor	35.89252222	-119.0494833
68	OH	23373 Parsons Ave.	Ducor	35.892175	-119.0498889
69	OH	23374 Parsons Ave.	Ducor	35.89224167	-119.0504917
70	OH	Braly Rd. x Parsons Ave.	Ducor	35.89118889	-119.0505056
71	OH	33625 Hwy 190	Springville	36.10156944	-118.8226778
72	OH	33787 Hwy 190	Springville	36.10195278	-118.8216472
73	OH	33789 Hwy 190	Springville	36.10242778	-118.8208
74	OH	33875 Hwy 190	Springville	36.102775	-118.8201972
75	OH	33925 Hwy 190	Springville	36.10318889	-118.8198611
76	OH	34746 Bogart Dr.	Springville	36.11260556	-118.8282917
77	OH	34746 A Bogart Dr.	Springville	36.11263611	-118.828475
78	OH	34746 B Bogart Dr.	Springville	36.11311667	-118.8286972
79	OH	35273 Redeleff Ave.	Springville	36.126025	-118.8241278
80	OH	35273 A Redeleff Ave.	Springville	36.12626389	-118.8246222
81	OH	35275 Redeleff Ave.	Springville	36.125775	-118.8245083
82	OH	35275 A Redeleff Ave.	Springville	36.12572222	-118.8240444
83	OH	35277 Redeleff Ave.	Springville	36.12598333	-118.8235333
84	OH	35182 Redeleff Ave.	Springville	36.12604167	-118.8234778
85	OH	35424 Ward Ave.	Springville	36.12948333	-118.82245
86	OH	35425 Ward Ave.	Springville	36.12933611	-118.8229222
87	OH	35356 Lenard Dr.	Springville	36.12957778	-118.82335

Loc#	Struct Type	Address	City	Lat	Long
88	OH	35356 Lenard Dr.	Springville	36.12864722	-118.8235639
89	OH	35302 Lenard Dr.	Springville	36.127575	-118.8236472
90	OH	35276 Lenard Dr.	Springville	36.12715278	-118.8235472
91	OH	35260 Lenard Dr.	Springville	36.12708611	-118.8235778
92	OH	27995 Worth Dr.	Porterville	36.05212222	-118.9471194
93	OH	28010 Worth Dr.	Porterville	36.05204444	-118.9469306
94	OH	28013 Worth Dr.	Porterville	36.05241667	-118.9457389
95	OH	27981 Worth Dr.	Porterville	36.053375	-118.9465944
96	OH	224 E. Henderson Ave.	Porterville	36.081075	-119.0106056
97	OH	224 A E. Henderson Ave.	Porterville	36.08007778	-119.0116583
98	OH	225 E. Henderson Ave.	Porterville	36.08008056	-119.01175
99	OH	201 E. Henderson Ave.	Porterville	36.08008611	-119.0120611
100	OH	133 E. Henderson Ave.	Porterville	36.08023056	-119.0135333
101	Ped	13130 Ave. 404	Cutler	36.52270556	-119.2795194
102	OH	13130 A Ave. 404	Cutler	36.52285278	-119.2790917
103	OH	13121 Ave. 404	Cutler	36.51978056	-119.2797083
104	OH	13111 Ave. 404	Cutler	36.5228	-119.2798528
105	OH	44582 Road 120	Orosi	36.59903889	-119.3049778
106	OH	44582 A Road 120	Orosi	36.59908333	-119.3046806
107	OH	44582 B Road 120	Orosi	36.59836667	-119.3041833
108	UG	218 Citrus Ave.	Orange Cove	36.63266111	-119.3087778
109	UG	85 Olive Dr.	Orange Cove	36.6324	-119.3087083
110	OH	85 Olive Dr.	Orange Cove	36.63242222	-119.3086889
111	OH	218 Citrus Ave.	Orange Cove	36.63253889	-119.3084806

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
8	Facilities not transferred to new utility pole.[23]
12	Facilities not transferred to new utility pole.
24	Loose/broken lashing.
77	Facilities not transferred to new utility pole.[24]
89	Pole extension hardware loose. Deteriorated pole.
93	Loose/broken lashing.

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

[23] During the field audit, Charter personnel indicated that the non-conformance was previously identified. ESRB requested confirmation provide job status, work order, priority, and due date in a Post-Audit Data Request, Feb 24, 2024. In Charter's response of March 21, 2024, only the location and a description of the non-conformance was provided. No evidence of a work order prior to the field identification was provided.
[24] Ibid.

Location	Findings
4	Abandoned service drop.
20	Abandoned service drop.
85	Abandoned line.
110	Abandoned service drop.

3. **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 9:

Table 9: GO 95, Rule 38 Findings

Location	Findings
3	Insufficient clearance to phone conductors.
15	Insufficient clearance to phone conductors.
25	Insufficient clearance to phone conductors.

Location	Findings
36	Insufficient clearance to phone conductors at snowshoe.
52	Insufficient clearance to supply conductor, midspan.
54	Insufficient clearance to phone conductors at Jackson loop.
55	Drip loops contacting other communication lines. Insufficient clearance to phone conductors.
57	Insufficient clearance to phone conductors.
72	Insufficient clearance to phone conductors, midspan.
79	Insufficient clearance to phone conductors at service drop (wrapped).
82	Insufficient clearance to phone conductors at drip loops. Insufficient clearance to supply at house.
88	Insufficient clearance to phone conductors at drip loops.
90	Insufficient clearance to phone fiber lines.
107	Insufficient clearance to supply connection at pole with guard arm.

4. **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 findings related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 84.6-B Findings

Location	Findings
36	The vertical ground wire is exposed, and the protective moulding cover is damaged.
55	The vertical ground wire is exposed, and the protective moulding cover is damaged.

5. **GO 95, Rule 84.6-D, Vertical and Lateral Conductors, Vertical Runs s**tates in part:

> *"Vertical runs of communication wires or cables supported on the surface of wood poles or structures… 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
12	Vertical run supports greater than 24 inches.
22	Vertical run supports greater than 24 inches.
38	Vertical run supports greater than 24 inches.
85	Vertical run supports greater than 24 inches.
93	Vertical run supports greater than 24 inches.
102	Vertical run supports greater than 24 inches.

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
15	The service drop is low over the curb line on public street.
39	The service drop is low over the curb line on public street.
53	The service drop is low over a driveway.
58	The service drop is low over a pedestrian accessible area.
85	The service drop is low over the center of the road.
88	The service drop is low over the center of the road.
89	The service drop is low over the center of the road.
91	The service drop is low over the center of the road.

7. GO 95, Rule 86.2, Guys-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 related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 86.2 Findings

Location	Findings
6	Slack down guy and buried anchor. [25]
15	Broken down guy. [26]
87	Slack down guy.[27]
98	Broken down guy.[28]

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 able 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:

[25] Ibid.
[26] Ibid
[27] Ibid.
[28] Ibid.

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

Location	Findings
53	Insufficient clearance to down guy.
99	Insufficient clearance to down guy, guard slipped away from contact point.

9. **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 finding related to the above rule is listed in Table 15:

Table 15: GO 95, Rule 87.7-D(1) Finding

Location	Finding
58	The riser guard is broken and exposing the communication drops.

10. **GO 95, Rule 92.1-F(2), Conductors, Cables and Messengers, Vertical Clearances Between Conductors, Cables, Messengers and Miscellaneous Equipment** states in part:

> *"All parts of such metal terminals, boxes or similar equipment which are 8 inches or more from center line of pole shall have vertical clearances from conductors not less than the clearance specified in Table 2, Col. C, Cases 8 to 13 inclusive.*
>
> *EXCEPTION: The minimum vertical distance between all parts of such metal terminals, boxes or similar equipment which are 8 inches or more from the center line of pole and are supported by cable and/or messenger alone can be reduced to*

not less than 1 inch by mutual agreement between the affected owners (see Rule 38, Table 2, Case 8, Column C).”

ESRB’s findings related to the above rule are listed in Table 16:

Table 16: GO 95, Rule 92.1-F(2) Findings

Location	Findings
8	Metal amplifier enclosure is contacting the phone lines.
36	Metal amplifier (node) enclosure clearance to phone is less than required.
38	Metal amplifier enclosure is contacting the phone lines.
94	Metal amplifier enclosure is contacting the phone lines.

11. 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 17:

Table 17: GO 128, Rule 17.1 Findings

Location	Findings
31	Conduit to enclosure has insufficient cover.
44	Missing ground rod and connection to amplifier.

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

Table 18: GO 128, Rule 17.8 Findings

Location	Findings
13	Missing ownership marking.
101	Missing ownership marking.
109	Missing ownership marking.

13. GO 128, Rule 42.7, Covers states:

> *"Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal (Also See Rule 17.8 and Appendix B, Figure 9)."*

ESRB's findings related to the above rule are listed in Table 19:

Table 19: GO 128, Rule 42.7 Findings

Location	Findings
33	Unsecured enclosure as found.
40	Unsecured enclosure as found.
42	Unsecured enclosure as found. (Repaired in field.)
44	Unsecured enclosure as found. (Repaired in field.)
45	Unsecured enclosure as found. (Repaired in field.)
50	Unsecured enclosure as found. (Repaired in field.)
108	Unsecured enclosure as found.

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, Charter created and sent third-party notifications to the respective utilities for the items below:

Table 20: Third-Party Observations

Location	Observations
1	Missing down guy marker.
5	Climbing obstruction (vegetation).
6	Abandoned phone drop.
8	Unsupported vertical phone line, greater than 24 inches between supports.
9	Phone line requires transfer to new utility pole. Phone down guy is slack, missing guy marker. Power down guy contacting communications line.

Location	Observations
11	Phone pole butt requires removal.
12	Deteriorated pole.
14	Phone line attached to comm line.
15	Woodpecker damage to pole.
16	Pole lean greater than 10%.
17	Unauthorized third-party attachments.
18	Woodpecker damage to pole. Abandoned phone lines.
19	Abandoned phone service.
20	Abandoned phone service.
21	Buddy pole needs removal. Unsupported phone vertical run/missing riser, adjacent pole.
22	Rotted supply cross arm (top). Missing visibility strips.
23	Unsupported vertical phone ground run/missing riser on pole. Adjacent pole: abandoned drop, low pole step. Adjacent pole: abandoned supply pole.
24	Broken supply ground moulding
25	Supply buddy pole requires removal.
26	Loose phone riser cover (Fixed in field)
33	Broken supply enclosure.
34	Unsecured phone enclosure, exposed wire (Fixed in field). Unsecured supply enclosure.
36	Loose phone lashing.
38	Loose phone lashing. Unsupported phone vertical run/missing riser on pole.
39	Phone line clearance to other services on pole. Phone service drop clearance to supply. Phone pole deteriorated, missing visibility strip.
51	Unsupported phone vertical run/missing riser on pole. Phone lines attached to communications lines/messenger.
52	Supply clearance to communications, midspan.

Location	Observations
53	Supply down guy to communications clearance. Phone attached to communications messenger. Low phone service drop clearance over driveway.
54	Abandoned supply ground. Missing supply High Voltage sign.
55	Unsupported vertical phone run/missing riser on pole. Abandoned supply ground. Missing supply guy marker/guard.
56	Loose phone riser. Supply riser spacer creates step to pole step.
57	Slack phone down guy.
58	Missing supply High Voltage sign.
59	Missing supply High Voltage sign.
60	Clearance, phone service drop.
71	Slack phone down guy
73	Deteriorated phone pole. Broken phone down guy.
75	Leaning phone pole. Broken phone lashing. Missing visibility strips on pole. Low phone lines, midspan.
76	Phone service drop on communications line.
77	Phone line requires transfer to new utility pole. Missing phone guy marker.
78	Phone line requires transfer to new utility pole.
79	Abandoned phone service drop.
81	Abandoned phone service drop, on ground. Missing phone guy marker. Phone pole lean.
82	Phone pole lean. Missing down guy marker. Phone clearance to other utilities at pole.
83	Abandoned phone drop.
84	Unauthorized phone attachment at communications level (phone messenger at communications level).
85	Phone line clearance over road. Unsupported phone vertical run/missing riser on pole.

Location	Observations
86	Phone pole lean greater than 10%.
87	Low phone line clearance over road.
88	Low phone pole step.
90	Low phone line clearance over road.
91	Low phone line clearance over road. Phone: Unattached equipment. Phone, low clearance to other communication lines on pole.
92	Abandoned phone service.
93	Phone service attached to communications messenger. Low phone drop clearance over road.
94	Low phone pole step.
95	Abandoned phone service drop. Phone pole missing visibility strips
96	Abandoned phone drop. Abandoned supply ground.
98	Missing supply High Voltage sign.
99	Exposed supply ground, unsupported vertical run/missing riser on pole. Broken phone enclosure.
102	Loose phone guard arm bracket. Unsupported phone line vertical run/missing riser on pole. Phone lines cross over communication lines. Abandoned supply ground.
105	Phone line contacting communications line. Missing supply visibility strips on pole.
110	Slack supply down guy.