PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

October 29, 2024 CA2024-1236

John Gutierrez
Senior Director- Government Affairs
Comcast
3055 Comcast Place, Livermore, CA 94551

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Comcast's Sacramento Metro Region

Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Monica Hoskins and Matthew Yunge of ESRB staff conducted a CIP audit of Comcast Sacramento Metro Region from August 26 through August 30, 2024. During the audit, ESRB staff conducted field inspections of Comcast'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 November 27, 2024, via electronic copy of all corrective actions and preventive measures taken by Comcast 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 Monica Hoskins at monica.hoskins@cpuc.ca.gov or (415) 652-1847.

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 Comcast Sacramento Metro Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Jason Aguas, Manager Regulatory Affairs – California, Comcast

COMCAST SACRAMENTO METRO REGION
COMMUNICATIONS AUDIT FINDINGS
AUGUST 26 – 30, 2024

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Comcast's Sacramento Metro Region:

- The U-Safe Program, General Order (GO) 95/128 Repair and Reporting Documentation, version March 2, 2010, with Comcast Repair Categories for Nonconformances.
- Facility statistics as of June 2024, including miles of overhead lines, miles of underground lines, number of poles, and number of underground structures.
- Overhead and Underground facility maps as of June 2024.
- Inspection and patrol records containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings and repairs from June 2019 through June 2024.
- Safety Hazards Notifications received from third-party utilities from June 2019 through June 2024.
- Safety Hazards Notifications sent to third-party utilities from June 2019 through June 2024.
- Pole loading calculations, including intrusive testing for Tier 2 and Tier 3 High Fire Threat Districts from June 2023 through June 2024.
- Employee statistics and employee training records from January 2021 through June 2024.
- Employee training materials, including the Comcast Outside Plant Handbook for Clearances and Regulations in California, contractor training PowerPoint on GO 95, and the Patrol Inspection Training Form.
- New construction projects from June 2023 through June 2024.

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 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."*

Comcast only conducts complete detailed inspections of its communication lines and assets in High Fire Threat Districts (HFTD). In all other areas, inspections only take place during other scheduled work. When sending a technician into the field to investigate an issue, the technician inspects the assigned pole and the associated assets, along with one span in each direction. Comcast has no set schedule for detailed inspections and patrols that ensures all poles and assets are inspected thoroughly and completely in non-HFTD.

ESRB notes that Comcast Sacramento Metro Region includes 116,779 poles. Comcast reports that Comcast averages 135,000 truck dispatches per year that include a "one span in each direction" inspection. Truck dispatches are based on customer calls and service changes with multiple dispatches frequently occurring at a single address. This method of inspection does not assure thorough and complete inspection of all facilities on a timely basis as required by GO 95 and GO 128.

2. **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

ESRB reviewed Comcast's Sacramento Metro Region patrol and detailed inspection records from June 2019 through June 2024 for the interval between inspections and the period since the last inspection.[1] ESRB found a total of 8,213 inspections (1.00%) were late or are past due of the 819,929 total patrols and detailed inspections. Table 1 breaks down the total late inspections for the Sacramento Metro Region by HFTD Tier and late inspection type. Late inspections are any inspections completed after the required interval. Past due inspections are inspections where the most recent inspection is overdue (past the required interval) as of June 30, 2024.

Table 1: Sacramento Metro Region Late and Past Due Inspections

HFTD Tier	Late Inspections	Past Due Inspections*	Total
2	397	1,482	1,879
3	1,466	4,868	6,334
Total	1,863	6,350	**8,213**

*as of June 30, 2024

ESRB used GO 95, Rule 80.1-A(1) inspection intervals for Tier 2 and 3 to assess the timeliness of Comcast's inspection and ESRB's analysis was based on street address as a unique identifier.[2]

3. **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.*

[1] ESRB analysis of Pre-Audit Data Request Responses Exhibit 5A Detailed and 5B Patrol.
[2] During the field audit, Comcast noted that multiple poles can be assigned to the same address, so the late and overdue inspection count here is conservative.

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 subject to the exception specified below."*

Comcast's *Repair Categories for Nonconformances*, shown in Table 2, outlines the repair timelines for nonconformance depending on priority level and High Fire Threat District:

Table 2: Comcast Repair Categories for Nonconformances[3]

Priority Level	Tier 3 HFTD		Tier 2 HFTD		Non-HFTD	
	GO 95 Repair Interval	Comcast Repair Interval	GO 95 Repair Interval	Comcast Repair Interval	GO 95 Repair Interval	Comcast Repair Interval
1	Immediate*					
2	6 months		12 months	6 months	36 months	
3	60 months	12 months	60 months	12 months	60 months	12 months

*Because of logistics involved in coordinating some Priority Level 1 tree trims, immediate repairs may take up to 90 days.

a. ESRB's review of Comcast's Sacramento Metro Region work orders from June 2019 through June 2024 found that 912 work orders (2.06%) were either closed late or were late and pending completion out of 44,358 total work orders[4]. Late closed work orders are

[3] Pre-Audit Data Request Response Exhibit 4D, Comcast Repair Categories for Nonconformances
[4] ESRB analysis of Pre-Audit Data Request Responses Exhibit 5A Detailed and 5B Patrol.

work orders completed after the listed due date. Late pending work orders are work orders that had due dates prior to July 1, 2024, but were not complete by that date. Table 3 breaks down the total late and late pending work orders for the Sacramento Metro Region by priority level and HFTD.

Table 3: Sacramento Metro Region Late Work Orders (WO)

Priority Levels	Tier 3 HFTD		Tier 2 HFTD		Non-HFTD		Totals
	Late Closed WO	Late Pending WO	Late Closed WO	Late Pending WO	Late Closed WO	Late Pending WO	
1	–	–	3	–	4	–	7
2	98	104	24	25	51	603	905
3	–	–	–	–	–	–	–
Total	202		52		658		**912**

The most overdue Priority 1 work order was identified during an inspection of the pole at 4914 Pony Express Trail, Camino. It was created on May 12, 2023 for a communications strand that was rubbing against a tree and had a due date of August 10, 2023. Comcast completed the work order on May 16, 2024, 280 days late.

The most overdue Priority 2 work order was identified during a patrol of the pole at 6221 Pine Street, Pollock Pines. It was created on July 25, 2019 for a problem with customer equipment and had a due date of January 21, 2020. Comcast completed the work order on December 17, 2021, 696 days late.

b. The Comcast Sacramento Metro Region work orders include inspections and patrols assigned to Tier 1 HFTD. However, Comcast does not define repair categories for Tier 1 work orders and does not define the priority codes for Tier 1 in its procedures. Comcast shall include Tier 1 HFTD to its repair categories shown in Table 2.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Structure Type	Address	City	GPS Coordinates
1	Underground Pedestal	3758 Iskenderun Avenue	Sacramento	(-121.54602304 38.64733853)
2	Underground Pedestal	3760 Iskenderun Avenue	Sacramento	(-121.54610427 38.6472899)
3	Underground Pedestal	140 Olivadi Way	Sacramento	(-121.54669737 38.64738966)
4	Underground Pedestal	110 Olivadi Way	Sacramento	(-121.54652611 38.64769521)
5	Underground Pedestal	160 Olivadi Way	Sacramento	(-121.54666756 38.64692299)
6	Underground Pedestal	187 Olivadi Way	Sacramento	(-121.54657679 38.64622322)
7	Underground Pedestal	3772 Sardinia Island Way	Sacramento	(-121.54652496 38.64581301)
8	Pole	614 Kesner Avenue	Sacramento	(-121.45165147 38.63379216)
9	Pole	618 Kesner Avenue	Sacramento	(-121.45142099 38.63380436)
10	Pole	608 Kesner Avenue	Sacramento	(-121.45197751 38.63380983)
11	Pole	Corner of Taylor Street and Kesner Avenue	Sacramento	(-121.45253528 38.63380485)
12	Pole	1407 G Street	Rio Linda	(-121.43306409 38.68011953)
13	Pole	1415 G Street	Rio Linda	(-121.43305979 38.68018409)
14	Pole	1411 G Street	Rio Linda	(-121.43298612 38.68072318)
15	Pole	1413 G Street	Rio Linda	(-121.43296855 38.68129552)
16	Pole	724 Myrtle Street	Galt	(-121.30156776 38.25669834)
17	Pole	718 Myrtle Street	Galt	(-121.30193655 38.25670736)
18	Pole	706 Myrtle Street	Galt	(-121.30229675 38.2567085)
19	Pole	Corner of Palin St and Myrtle Street	Galt	(-121.30253945 38.25667777)
20	Pole	632 Myrtle Street	Galt	(-121.30310972 38.2567092)
21	Pole	628 Myrtle Street	Galt	(-121.30331108 38.25670281)
22	Underground Pedestal	116 Amor Court	Galt	(-121.3148435 38.25691698)
23	Underground Pedestal	175 Emerald Oak Drive	Galt	(-121.31413483 38.25681467)
24	Underground Pedestal	187 Emerald Oak Drive	Galt	(-121.31415843 38.25720157)
25	Underground Pedestal	24 Brodie Drive	Galt	(-121.31375009 38.25761181)

26	Underground Pedestal	27 Royal Court	Galt	(-121.31322441 38.25806331)
27	Underground Pedestal	33 Royal Court	Galt	(-121.31311186 38.25797469)
28	Underground Pedestal	44 Brodie Drive	Galt	(-121.31320435 38.25757761)
29	Underground Pedestal	132 Amor Court	Galt	(-121.31525522 38.25682457)
30	Underground Pedestal	140 Amor Court	Galt	(-121.31583535 38.25676054)
31	Underground Pedestal	9285 Fox Springs Way	Galt	(-121.34009843 38.42083961)
32	Underground Pedestal	9289 Fox Springs Way	Elk Grove	(-121.34011683 38.42051392)
33	Underground Pedestal	9297 Fox Springs Way	Elk Grove	(-121.34012354 38.42019516)
34	Underground Pedestal	9317 Fox Springs Way	Elk Grove	(-121.34009818 38.41952462)
35	Underground Pedestal	9584 Spring River Way	Elk Grove	(-121.34002482 38.41916489)
36	Underground Pedestal	9576 Spring River Way	Elk Grove	(-121.34038503 38.41929674)
37	Underground Pedestal	9568 Spring River Way	Elk Grove	(-121.34086428 38.4193514)
38	Underground Pedestal with Node	9556 Spring River Way	Elk Grove	(-121.34132641 38.41941306)
39	Pole	9045 Elk Grove Boulevard	Elk Grove	(-121.36505435 38.40961245)
40	Pole	Corner of 1st Avenue and Elk Grove Boulevard Quaymas Court Alley	Elk Grove	(-121.36515806 38.40956062)
41	Pole	9033 Elk Grove Boulevard	Elk Grove	(-121.36545285 38.40957952)
42	Pole	9027 Elk Grove Boulevard	Elk Grove	(-121.36583062 38.40959263)
43	Pole	9005 Elk Grove Boulevard	Elk Grove	(-121.36638217 38.40963457)
44	Pole	9003 Elk Grove Boulevard	Elk Grove	(-121.36693321 38.4095622)
45	Pole	9589 2nd Avenue	Elk Grove	(-121.36702178 38.40958962)
46	Underground Pedestal	4265 Ardwell Way	Sacramento	(-121.45513875 38.46710896)

47	Underground Pedestal	8025 Puka Way	Sacramento	(-121.45481116 38.46672364)
48	Underground Pedestal	8029 Puka Way	Sacramento	(-121.45473845 38.46642757)
49	Underground Pedestal	8044 Puka Way	Sacramento	(-121.45485028 38.46589766)
50	Underground Pedestal	8040 Puka Way	Sacramento	(-121.45480683 38.46606957)
51	Underground Pedestal	4209 Equinox Way	Sacramento	(-121.4553682 38.46637801)
52	Underground Pedestal	4201 Equinox Way	Sacramento	(-121.45576937 38.46628953)
53	Underground Pedestal with Node	4181 Equinox Way	Sacramento	(-121.4565864 38.46614299)
54	Pole	4904 Roosevelt Avenue	Sacramento	(-121.44847714 38.53367283)
55	Pole	4828 Roosevelt Avenue	Sacramento	(-121.44874066 38.53370788)
56	Pole	4820 Roosevelt Avenue	Sacramento	(-121.44924958 38.53369131)
57	Pole	4806 Roosevelt Avenue	Sacramento	(-121.44962674 38.53363238)
58	Pole	4743 Roosevelt Avenue	Sacramento	(-121.44993961 38.53391049)
59	Pole	4901 49th Street	Sacramento	(-121.44866461 38.53402316)
60	Pole	4529 49th Street	Sacramento	(-121.44869691 38.53421734)
61	Pole	Corner of Seville Way and L Street	Sacramento	(-121.46479063 38.5706879)
62	Pole	1225 Seville Way	Sacramento	(-121.46484923 38.57048122)
63	Pole	1235 Seville Way	Sacramento	(-121.46500188 38.57017779)
64	Pole	3161 L Street	Sacramento	(-121.46473959 38.57085954)
65	Pole	3315 Mater Field Road	Rancho Cordova	(-121.30281574 38.57493469)
66	Pole	3307 Mater Field Road	Rancho Cordova	(-121.30318468 38.57532829)
67	Pole	3307 Mater Field Road	Rancho Cordova	(-121.30318739 38.57563518)
68	Pole	3323 Mater Field Road	Rancho Cordova	(-121.29160592 38.61733514)
69	Underground Pedestal	10401 Rockingham Drive, Apartment 3/4	Rancho Cordova	(-121.29112051 38.61729807)
70	Underground Pedestal	10401 Rockingham Drive, Apartment 7/8	Rancho Cordova	(-121.29072238 38.61727613)

71	Underground Pedestal	10701 Ambassador Drive	Rancho Cordova	(-121.29232966 38.61727216)
72	Underground Pedestal	10709 Ambassador Drive	Rancho Cordova	(-121.29255609 38.61723335)
73	Underground Pedestal	10715 Ambassador Drive	Rancho Cordova	(-121.29289223 38.61707404)
74	Underground Pedestal	10661 Ambassador Drive	Rancho Cordova	(-121.29330306 38.61697354)
75	Underground Pedestal	10653 Ambassador Drive	Rancho Cordova	(-121.29010785 38.67015556)
76	Underground Pedestal	10645 Ambassador Drive	Rancho Cordova	(-121.29012796 38.6700689)
77	Underground Pedestal	10637 Ambassador Drive	Rancho Cordova	(-121.2911669 38.67016045)
78	Pole	5704 Larry Avenue	Citrus Heights	(-121.29206305 38.67014194)
79	Pole	7512 Larry Avenue	Citrus Heights	(-121.23977633 38.67320118)
80	Pole	7410 Ranch Avenue	Citrus Heights	(-121.23973201 38.67254718)
81	Pole	5740 San Juan Avenue	Citrus Heights	(-121.23976199 38.6721896)
82	Pole	5901 Almond Avenue	Orangevale	(-121.2399896 38.67199564)
83	Pole	5850 Almond Avenue	Orangevale	(-121.24057124 38.6717407)
84	Pole	5806 Almond Avenue	Orangevale	(-121.24106343 38.67172667)
85	Underground Pedestal	8599 Mandorla Circle	Orangevale	(-121.24149233 38.67171209)
86	Underground Pedestal	8592 Mandorla Circle	Orangevale	(-121.24160318 38.67208852)
87	Underground Pedestal	8584 Mandorla Circle	Orangevale	(-121.24158586 38.6722518)
88	Underground Pedestal	8576 Mandorla Circle	Orangevale	(-121.26932386 38.73173763)
89	Underground Pedestal	8560 Mandorla Circle	Orangevale	(-121.26935345 38.73139141)
90	Underground Pedestal	8556 Mandorla Circle	Orangevale	(-121.26934715 38.73137253)
91	Underground Pedestal	1166 Green Hill Drive	Roseville	(-121.26940946 38.73100587)
92	Underground Pedestal	1174 Green Hill Drive	Roseville	(-121.26937954 38.73078302)
93	Underground Pedestal	1178 Green Hill Drive	Roseville	(-121.26918745 38.73081523)

94	Underground Pedestal	1182 Green Hill Drive	Roseville	(-121.26917615 38.73099258)
95	Underground Pedestal	1184 Green Hill Drive	Roseville	(-121.26918703 38.73121527)
96	Underground Pedestal	1187 Green Hill Drive	Roseville	(-121.26921508 38.7314304)
97	Underground Pedestal	1181 Green Hill Drive	Roseville	(-121.26915077 38.73169726)
98	Underground Pedestal	1177 Green Hill Drive	Roseville	(-121.33525228 38.77678376)
99	Underground Pedestal	1173 Green Hill Drive	Roseville	(-121.33645342 38.77662713)
100	Underground Pedestal	1165 Green Hill Drive	Roseville	(-121.33653865 38.77700226)
101	Underground Pedestal	1323 Avenida Alvarado	Roseville	(-121.33669582 38.77749599)
102	Underground Pedestal	1333 Avenida Alvarado	Roseville	(-121.33699777 38.77772377)
103	Underground Pedestal	1812 Paseo Penasco	Roseville	(-121.33703176 38.77772917)
104	Underground Pedestal with Node	1818 Paseo Penasco	Roseville	(-121.3377722 38.77806296)
105	Underground Pedestal	1820 Paseo Penasco	Roseville	(-121.33728045 38.77654961)
106	Underground Pedestal	1824 Paseo Penasco	Roseville	(-121.3376655 38.77654696)
107	Underground Pedestal	1828 Paseo Penasco	Roseville	(-121.33685009 38.77656918)
108	Underground Pedestal with Node	1339 Avenida Alvarado	Roseville	(-121.37832748 38.70677603)
109	Underground Pedestal	1343 Avenida Alvarado	Roseville	(-121.37872656 38.70681108)
110	Underground Pedestal	1337 Avenida Alvarado	Roseville	(-121.37918402 38.70678229)
111	Underground Pedestal	3624 Lasick Court	Sacramento	(-121.3798059 38.70671752)
112	Underground Pedestal	3616 Lasick Court	Sacramento	(-121.38031982 38.70675894)
113	Underground Pedestal	3608 Lasick Court	Sacramento	(-121.38073567 38.70685115)
114	Underground Pedestal	3600 Lasick Court	Sacramento	(-121.38117579 38.70666222)
115	Underground Pedestal	3551 Treleaven Court	Sacramento	(-121.38138283 38.70681696)

116	Underground Pedestal	3545 Treleaven Court	Sacramento	(-121.38182247 38.70685887)
117	Underground Pedestal	3534 Treleaven Court	Sacramento	(-121.38185222 38.70683017)
118	Underground Pedestal	3533 Treleaven Court	Sacramento	(-121.45227809 38.69836902)
119	Underground Pedestal	3525 Treleaven Court	Sacramento	(-121.45281733 38.6983839)
120	Underground Pedestal	3520 Treleaven Court	Sacramento	(-121.45341497 38.69838442)
121	Pole	590 Q Street	Rio Linda	(-121.45332626 38.69858872)
122	Pole	570 Q Street	Rio Linda	(-121.45356263 38.69902302)
123	Pole	Corner of Q Street and Front Street	Rio Linda	(-121.4537176 38.69926311)
124	Pole	525 Q Street	Rio Linda	(-120.74493172 38.73204094)
125	Pole	7220 Front Street	Rio Linda	(-120.74466602 38.73216495)
126	Pole	7226 Front Street	Rio Linda	(-120.74480683 38.73227264)
127	Pole	3020F Newton Road	Placerville	(-120.74419594 38.73248179)
128	Underground Vault	3020 Newton Road Apartment 22	Placerville	(-120.74501799 38.73228889)
129	Pole	3021G Newton Road	Placerville	(-120.7456974 38.73229807)
130	Pole	3051 Newton Road	Placerville	(-120.81583997 38.73870037)
131	Pole	3020C Newton Road	Placerville	(-120.81578177 38.73914059)
132	Pole	3030 Newton Road	Placerville	(-120.8154134 38.73931975)
133	Underground Pedestal	2525 Patti Court	Placerville	(-120.81490436 38.73932633)
134	Underground Vault	2516 Patti Court	Placerville	(-120.81461868 38.73960963)
135	Underground Pedestal	2506 Patti Court	Placerville	(-120.81390911 38.73891436)
136	Underground Pedestal with Node	2500 Patti Court	Placerville	(-120.83307082 38.90954162)
137	Underground Pedestal	2496 Deena Court	Placerville	(-120.83338511 38.90899383)
138	Underground Pedestal with Node	667 James Drive	Placerville	(-120.83385972 38.90844093)
139	Pole	3087 B Street	Georgetown	(-120.83413953 38.9079769)
140	Pole	3091 B Street	Georgetown	(-120.83440576 38.90772837)
141	Pole	3105 B Street	Georgetown	(-120.83478876 38.90690354)
142	Pole	3121 B Street	Georgetown	(-120.83525901 38.68669387)

143	Pole	3126 B Street	Georgetown	(-120.83484553 38.68627459)
144	Pole	2861 Harkness Street	Georgetown	(-120.83430704 38.68645464)
145	Underground Pedestal	3208 Grace Drive	Diamond Springs	(-120.83391166 38.68671013)
146	Pole	4420 Pleasant Valley Road	Diamond Springs	(-120.83540102 38.68586871)
147	Pole	6585 Pleasant Valley Road	Diamond Springs	(-120.91802957 38.66663506)
148	Pole	4420 Pleasant Valley Road	Diamond Springs	(-120.91781738 38.66595778)
149	Pole	3203 Grace Drive	Diamond Springs	(-120.91765204 38.66559946)
150	Pole	4520 Holiday Lake Drive	Shingle Springs	(-120.91708349 38.66534762)
151	Pole	4540 Holiday Lake Drive	Shingle Springs	(-120.91691623 38.66472106)
152	Pole	4501 Holiday Lake Drive	Shingle Springs	(-120.97896228 38.69075662)
153	Pole	4507 Lakeshore Court	Shingle Springs	(-120.97841785 38.69060108)
154	Pole	4521 Lakeshore Court	Shingle Springs	(-120.97840583 38.69019231)
155	Underground Pedestal	2500 Almeria Drive	Cameron Park	(-120.97837015 38.68996963)
156	Underground Pedestal with Node	2510 Almeria Drive	Cameron Park	(-120.97822718 38.69123448)
157	Underground Pedestal	521 Dizmar Court	Cameron Park	(-120.97820751 38.69167465)
158	Underground Pedestal	520 Dizmar Court	Cameron Park	(-121.07156702 38.71288302)
159	Underground Pedestal	413 Malaga Court	Cameron Park	(-121.07120283 38.71234426)
160	Underground Pedestal	401 Malaga Court	Cameron Park	(-121.07111658 38.71234444)
161	Pole	1190 Uplands Drive	El Dorado Hills	(-121.55242226 38.50543094)
162	Pole	1210 Uplands Drive	El Dorado Hills	(-121.55301472 38.50545643)
163	Pole	1190 Uplands Drive	El Dorado Hills	(-121.55340695 38.50495753)
164	Underground Pedestal with Node	236 Riverbrook Way	Sacramento	(-121.55355021 38.50464492)

165	Underground Pedestal	6696 Trudy Way	Sacramento	(-121.55374948 38.50423706)
166	Underground Pedestal	6704 Trudy Way	Sacramento	(-121.55402401 38.50388407)
167	Underground Pedestal	6712 Trudy Way	Sacramento	(-121.55418127 38.5034771)
168	Underground Pedestal	6720 Trudy Way	Sacramento	(-121.55366101 38.50320709)
169	Underground Pedestal	2725 Trudy Way	Sacramento	(-121.55286233 38.50337949)
170	Underground Pedestal	6801 Harmon Way	Sacramento	(-121.5526064 38.50374428)
171	Underground Pedestal	6806 Harmon Way	Sacramento	(-121.55208333 38.50474108)
172	Underground Pedestal	6801 Harmon Way	Sacramento	(-121.55199817 38.50521706)
173	Underground Pedestal	6775 Pocket Way	Sacramento	(-121.73736184 38.54697685)
174	Power Supply Box	6724 Pocket Way	Sacramento	(-121.7374591 38.54726585)
175	Underground Pedestal	244 Riverbrook Way	Sacramento	(-121.73754604 38.54760828)
176	Pole	402 I Street	Davis	(-121.73815108 38.54764232)
177	Pole	418 I Street	Davis	(-121.73802038 38.54718673)
178	Pole	422 I Street	Davis	(-121.73799618 38.54690053)
179	Pole	960 5th Street	Davis	(-121.73785998 38.54647643)
180	Pole	417 I Street	Davis	(-121.72746993 38.55551582)
181	Pole	403 I Street	Davis	(-121.7274719 38.55596098)
182	Pole	335 I Street	Davis	(-121.72741788 38.55620146)
183	Pole	1919 Wahl Way	Davis	(-121.7274644 38.55639071)
184	Pole	1014 Snyder Drive	Davis	(-121.72747816 38.55516501)
185	Pole	1026 Snyder Drive	Davis	(-121.72748139 38.5548155)
186	Pole	1201 Pole Line Road	Davis	(-121.54602304 38.64733853)
187	Pole	938 Wahl Way	Davis	(-121.54610427 38.6472899)
188	Pole	920 Snyder Drive	Davis	(-121.54669737 38.64738966)

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 finding related to the above rule is listed in Table 4:

Table 4: GO 95, Rule 31.1 Finding

Location	Findings
66	The lashing wire is loose between Location 65 and Location 66.

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 5:

Table 5: GO 95, Rule 31.6 Findings

Location	Findings
141	The drop is abandoned and needs to be removed. Comcast fixed this issue in the field.
187	The drop is abandoned and needs to be removed.

3. **GO 95, Rule 35, Vegetation Management s**tates in part:

   "Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction

and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule."

ESRB's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 35 Findings

Location	Findings
17	Vegetation is causing strain on the service drop to 710 Myrtle Street, Galt. Comcast fixed this issue in the field.
152	Vegetation is causing strain and abrasion on the messenger and node.
181	Vegetation is causing strain and abrasion on the conductors and drops.

4. **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 s 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 7:

Table 7: GO 95, Rule 38 Findings

Location	Findings
10	The service drop for 611 Kesner Avenue, Sacramento is hanging low and in contact with other facilities.
67	The drop is hanging low and in contact with AT&T facilities.
127	The loose drops are in contact with other facilities.

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 findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 84.6-B Findings

Location	Findings
12	The vertical ground wire is exposed, and the protective moulding cover is loose.
21	The vertical ground wire is exposed, and the protective moulding cover is damaged.
39	The vertical ground wire is exposed, and the protective moulding cover is missing.

Location	Findings
56	The vertical ground wire is exposed, and the protective moulding cover is loose.
58	The vertical ground wire is exposed, and the protective moulding cover is damaged.
64	The vertical ground wire is exposed, and the protective moulding cover is loose.
67	The vertical ground wire is exposed, and the protective moulding cover is loose.
68	The vertical ground wire is exposed, and the protective moulding cover is loose.
161	The vertical ground wire is exposed, and the protective moulding cover is damaged.
180	The vertical ground wire is exposed, and the protective moulding cover is loose.

6. **GO 95, Rule 84.6-F, Protective Covering** states:

"Protective covering shall be attached to poles, crossarms and structures by means of corrosion–resistant straps, lags or staples which are adequate to maintain such covering in a fixed position.

Where such covering consists of hardwood or rigid plastic moulding, the distance between straps, lags or staples shall not exceed three feet on each side and due care shall be exercised to avoid the possibility of nails protruding through any inner surface.

When U–shaped moulding is utilized appropriate gaps between sections shall be provided to permit expansion due to temperature variations and such gaps shall be covered by corrosion resistant straps to prevent contact with conductors covered by moulding."

ESRB's finding related to the above rule is listed in Table 9:

Table 9: GO 95, Rule 84.6-F Finding

Location	Findings
185	The ground wire moulding is unsecured to the pole.

7. **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 10:

Table 10: GO 95, Rule 84.8-C Findings

Location	Findings
80	The service span is 15ft 5in above the public thoroughfare and does not meet the minimum clearance requirement.
131	The service drop feeding 3020C Newton Road, Placerville is hanging low over a residential driveway. Comcast fixed this issue in the field.

8. **GO 95, Rule 86.7-B, Location of Sectionalizing Insulators, 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 related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 86.7-B Findings

Location	Findings
39	Vegetation above the down guy insulator is contacting and grounding the anchor guy.
66	Vegetation above the down guy insulator is contacting and grounding the anchor guy.
151	Vegetation above the down guy insulator is contacting and grounding the anchor guy.

9. **GO 95, Rule 86.9, Guy Marker (Guy Guard)** states:

   "A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."

   ESRB's finding related to the above rule is listed in Table 12:

Table 12: GO 95, Rule 86.9 Finding

Location	Findings
151	The anchor down guy has a broken guy guard. Comcast fixed this issue in the field.

10. **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 findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 87.7-D(1) Findings

Location	Findings
62	The riser guard is missing and exposing the communication drops.
81	The riser guard is missing and exposing the communication drops.
125	The riser guard is missing and exposing the communication drops.
127	The riser guard is missing and exposing the communication drops and creating clearance issues.
150	The riser guard is missing and exposing the communication drops.
162	The riser guard is damaged and exposing the communication drops.

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 14:

Table 14: GO 128, Rule 17.1 Findings

Location	Findings
26	The pedestal enclosure is damaged and needs replacement.
28	The pedestal is missing the required grounding.
30	The pedestal enclosure is missing the base and accessible to the public and needs replacement. The pedestal is missing the required grounding.
36	The pedestal enclosure is damaged and needs replacement.

Location	Findings
38	The pedestal is missing the required grounding. Comcast fixed this issue in the field.
46	The pedestal is missing the required grounding.
49	The pedestal has an unconnected grounding wire and grounding rod. Comcast fixed this issue in the field.
52	The pedestal enclosure is unsecured and accessible to the public and needs replacement.
69	The grounding box is inaccessible and needs replacement.
70	The grounding box is inaccessible and needs replacement.
74	The pedestal is missing the required grounding.
90	The pedestal is missing the required grounding.
101	The pedestal enclosure is damaged and needs replacement.
111	The pedestal enclosure is damaged and needs replacement.
117	The pedestal is missing the required grounding.
120	The pedestal enclosure is damaged and needs replacement. The pedestal is missing the required grounding.
135	The pedestal enclosure is damaged and needs replacement.
156	The pedestal is missing the required grounding.
160	The pedestal has an unconnected grounding wire and grounding rod. Comcast fixed this issue in the field.
169	The pedestal enclosure is damaged and needs replacement. The pedestal is missing the required grounding.
171	The pedestal enclosure is damaged and needs replacement.
175	The pedestal enclosure is damaged and needs replacement.

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 15. While in the field, Comcast created and sent third-party notifications to the respective utilities for the items below:

Table 15: Third-Party Observations

Location	Observations
9	AT&T has an abandoned drop.
11	AT&T has a loose equipment box hanging from their lines.
12	AT&T has a drop attached to Comcast facilities. AT&T has an abandoned drop.
15	SMUD has a customer fence/gate attached to their pole.
18	AT&T has a drop attached to Comcast facilities. AT&T has a broken riser bracket and ground moulding below 8ft.
21	AT&T has drops attached to other facilities. AT&T has an unattached splice enclosure and ground moulding below 8ft.

Location	Observations
40	Phone has a span guy contacting other facilities.
41	SMUD has an exposed ground wire.
43	Frontier has an abandoned drop. Frontier has vegetation on their span wire between Location 43 and Location 44
45	Frontier has drops attached to Comcast facilities.
55	Power has a low pole step.
58	SMUD has an exposed ground wire.
60	AT&T and other communication drops are in contact with other facilities.
62	Phone has an abandoned drop.
65	Communications has a slack down guy.
67	AT&T has unsecured riser guard.
80	AT&T has a drop attached to Comcast facilities. AT&T has a low span wire at 13ft 5in.
81	SMUD has a low pole step.
83	AT&T has unsecured drops and a missing riser guard. SMUD has an exposed ground wire.
124	AT&T has an abandoned drop.
125	AT&T has a missing riser guard and an unattached splice box.
127	AT&T has abandoned drops. Phone has unsecured drops and a missing riser guard.
141	AT&T has an abandoned drop.
143	AT&T has an incomplete pole transfer. PG&E has vegetation on their service drop.
150	AT&T has unsecured drops and a missing riser guard. AT&T has a broken lashing wire. AT&T has abandoned drops.
151	AT&T has unsecured drops and a missing riser guard.
154	AT&T has unsecured riser guard.
163	AT&T has vegetation above the down guy insulator.
185	AT&T has an unsecured riser guard. Communications has an unsecured riser guard. PG&E has a missing secondary riser guard and exposed secondary wire.