

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 28, 2025

CA2024-1240

Gail Long
Sr. Manager-State Government Affairs
TDS Telecom (TDS)
525 Junction Road
Madison, WI 53717

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

Ms. Long:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Javier Reyes of ESRB conducted a CIP audit of TDS'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). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than February 26, 2025, by electronic copy of all corrective actions and preventive measures taken by TDS to correct the identified violations and prevent the recurrence of such violations.

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 Brandon Vazquez at (628) 249-2867 or brandon.vazquez@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rickey Tse'.

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

Enclosure: CPUC CIP Audit Report for TDS Telecom – Happy Valley

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC

Yi Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC
Javier Reyes, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Michael Brinkley, Manager – Field Services, TDS

**CPUC AUDIT FINDINGS
TDS TELECOM (TDS) – HAPPY VALLEY CIP AUDIT
NOVEMBER 12-15, 2024**

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) reviewed the following records:

- TDS’s facilities statistics.
- TDS Facility Maps for each Wire Center.
- TDS’s General Order (GO) 95 inspection programs.
- TDS’s inspector training program.
- Patrol and detailed-inspection records for the last five years (September 2019 – September 2024).
- Work order records for overhead and underground TDS facilities for the last five years (September 2019 – September 2024).
- Third Party Safety Hazard notifications for the last five years (September 2019 – September 2024).
- Pole loading and safety factor calculations completed in the last twelve months (September 2023 – September 2024).
- Intrusive pole tests conducted in the last three years (September 2021 – September 2024).
- New construction projects completed in the last twelve months (September 2023 – September 2024).

II. Records Violations

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

1. 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

Commission Decision, D.17-12-024, under Ordering Paragraph #4 states, *“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:*

- i. *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 ...*

TDS Pole Maintenance Program 2024 states in part:

“Pole Audits in Very High/High Risk areas [...] all uploaded with a 10% per year breakdown for a 10-year inspection cycle as part of this new process.”

ESRB’s review of TDS’s Pole Maintenance Program found that TDS inspects all its poles at a 10-year interval and inspects 10% of its poles annually. In the Tier 2 High Fire-Treat District (HFTD), GO 95, Rule 80.1-A(1) requires detailed inspections at a 10-year interval and patrol inspections at a 2-year interval. Additionally, in the Tier 3 HFTD, GO 95, Rule 80.1-A(1) requires detailed inspections at a 5-year interval and patrol inspections at a 1-year interval. While the TDS 10-year inspection interval meets the GO 95, Rule 80.1-A(1), Tier 2 HFTD 10-year detail inspection requirement, it does not meet the Tier 2 HFTD 2-year patrol inspection requirement or the Tier 3 HFTD 5-year detail inspection and 1-year patrol inspection requirement. Therefore, ESRB finds TDS in violation of GO 95, Rule 80.1-A(1) for failing to have a Tier 2 HFTD 2-year patrol inspection requirement, Tier 3 HFTD 1-year patrol inspection requirement, and Tier 3 HFTD 5-year detail inspection requirement.

Per D.17-12-024, TDS should have implemented a schedule and initiated field work for detailed inspections by September 1, 2018 for the Tier 3 HFTD and by June 30, 2019 for the Tier 2 HFTD.

Please provide ESRB with TDS’s updated pole detailed inspection and patrol inspection program.

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.”

TDS did not provide any underground patrol or inspection records for the period of September 2019 through September 2024. Therefore, TDS failed to show compliance with GO 128, Rule 17.2 through their inspection records. TDS’s procedures do not specify the required frequency of conducting patrols and inspections for underground facilities. TDS must update its procedures to indicate required patrol and inspection time intervals to ensure that all its underground communication facilities are subject to the required inspections per GO 128, Rule 17.2.

Please provide ESRB with TDS’s updated underground detailed inspection and patrol inspection program.

3. 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.”*

Commission Decision, D.17-12-024, under Ordering Paragraph #4 states, *“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:*

- i. Fully implemented in Tier 3 statewide by September 1, 2018, including full requirements pertaining to frequency of inspections ...”*

ESRB’s review of TDS’s procedures found that TDS does not have an intrusive inspection procedure for TDS owned poles per GO 95, Rule 80.1-B in the Tier 3 HFTD. Per TDS’s response on 11/20/2024 to ESRB’s Post-Audit Data Request: “TDS does not have specific time intervals for scheduled intrusive testing.” However, TDS stated that it does “perform hammer and probe tests on poles that we will climb, or on poles that do not pass visual inspection during our scheduled 10-year inspection.” TDS did not provide ESRB any records of intrusive tests conducted in the last three years (September 2021 – September 2024). If TDS owns poles in the Tier 3 HFTD, TDS would be in violation of GO 95, Rule 80.1-B since its current practices do not ensure every TDS owned poles within one span of a joint-use pole supporting supply lines in a Tier 3 HFTD are intrusively inspected.

Per D.17-12-024, TDS should have implemented a schedule and initiated field work for intrusive inspections by September 1, 2018 for the Tier 3 HFTD.

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.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Structure ID	Structure Type	GIS Coordinates
1	D3A4A1	Pedestal	40.427475, -122.407141
2		Pedestal	40.427497, -122.407554
3	DSA 34403	Padmount Comms Equipment Box	40.424719, -122.402087
4	AFC RT12	Padmount Comms Equipment Box	40.424712, -122.402078
5	CL	Cross Box Pedestal	40.424689, -122.402106
6	D3A11	Cross Box Pedestal	40.424868, -122.402372
7	5000-35	Pedestal	40.46029, -122.454532
8		Pedestal	40.460294, -122.454511
9		Comms Pole	40.460286, -122.454508
10	121727490	Secondary Pole	40.459661, -122.454452
11		Padmount Comms Equipment Box	41.085074, -122.707206
12	3283	Comms Pole	41.085035, -122.70712
13	2300	Primary Pole	41.087099, -122.703949
14	B1E9	Pedestal	40.982518, -122.695195
15	B1E8	Pedestal	40.982923, -122.695397
16		Pedestal	40.846702, -122.830405
17	4124	Primary Pole	40.846723, -122.830385
18	16851	Primary Pole	40.846991, -122.830399
19	A2	Pedestal	40.361405, -122.913994
20		Battery Rack	40.35546, -122.889212
21		Pedestal	40.439375, -122.661183
22		Pedestal	40.473347, -122.62099
23	DSA 34209	Padmount Comms Equipment Box	40.473328, -122.621008
24	A7A8	Pedestal	40.47343, -122.620931
25	A5A3	Pedestal	40.47739, -122.594578
26	FP-4	Pedestal	40.504402, -122.541429
27	AA2A2	Pedestal	40.504373, -122.541443

28	F6A1	Pedestal	40.485271, -122.450826
29	F6A	Pedestal	40.485185, -122.45134
30	F5A10	Pedestal	40.485014, -122.451973
31	A1B12	Pedestal	40.470665, -122.429485
32	7000-3	Pedestal	40.470715, -122.429775
33	A1A1	Pedestal	40.470786, -122.429745
34	B4H4	Pedestal	40.469032, -122.395461
35	B4H5	Pedestal	40.469057, -122.394661
36	B4H6	Pedestal	40.469036, -122.393631
37		Pedestal	40.46919, -122.393707
38	C2C2	Pedestal	40.438074, -122.400472
39	C2A6	Pedestal	40.439182, -122.400283
40		Pedestal	40.43885, -122.387818
41		Pedestal	40.438884, -122.38762

IV. Field Inspection Violations

ESRB observed the following violations during the field inspection:

1. 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.”

Location	Violation Description
1	Faded ownership sign.
6	Faded ownership sign.
7	Missing ownership sign.
21	Faded ownership sign.
26	Missing ownership sign.
31	Faded ownership sign.
34	Faded ownership sign.
35	Faded ownership sign.

V. Field Observations

ESRB staff observed no third-party potential violations during the field inspection.