STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

February 4, 2025 CA2024-1264

Ross Johnson
AT&T Director of Regulatory Relations
430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Fresno, Kings, and Tulare County Region

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Stephen Lee and Joseph Murphy of ESRB staff conducted a CIP audit of AT&T's Fresno, Kings, and Tulare County region from November 4 to November 8, 2024. During the audit, ESRB staff conducted field inspections of AT&T's facilities and equipment 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 March 4, 2025, by electronic copy of all corrective actions and preventive measures taken by AT&T 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 the audit on the CPUC website. If there is any information in your response that you want 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 Stephen Lee at (916) 661-2353 or Stephen.Lee@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 CIP Audit Report for AT&T Fresno, Kings, and Tulare County Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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CPUC AUDIT FINDINGS OF AT&T

FRESNO, KINGS, AND TULARE COUNTIES

NOVEMBER 4 – 8, 2024

I. Records Review

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

- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines Procedure
- AT&T's Facility Statistics of the Fresno, Kings, and Tulare Counties service areas
- AT&T's List of Facility Locations
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the last 5 years (September 2019 – September 2024)
- Most Recent Work Orders Conducted in the last 5 years (September 2019 – September 2024)
- Pole Loading Calculations Conducted in the last 12 months (September 2023 – September 2024)
- Safety Hazard Notifications AT&T received and sent to Third Parties in the last 5 years (September 2019 – September 2024)
- New Construction Projects Completed in the last 12 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 18-B1(a), Maintenance Programs** states in part:

> *"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."*

AT&T's Overhead Lines Maintenance Plan assigns the following work order priority levels:

Priority Level	Required Due Date
1	• 72 hours
2	• 36 months
2a	• 12 months
2b	• 12 months if in Fire Map Tier 2 • 6 months if in Fire Map Tier 3 • 36 months if in Fire Map Tier 1
2c	• 12 months if in Fire Map Tier 2 and 1 • 6 months if in Fire Map Tier 3
3	• 60 months

ESRB's review of AT&T's overhead work orders from September 1, 2019 through September 1, 2024 found that 211 out of 7,896 (or 2.7%) work orders are late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their priority level, and late-closed work orders are work orders that were completed past their assigned due date based on their priority level. Table 1 below breaks down the 211 late overhead work orders by priority level.

Table 1: Late Overhead Facility Work Orders

Priority Level	Late-Pending Work Orders[1]	Late-Complete Work Orders	Total Late Work Orders	Total Tags Created	Percentage Late
1	0	0	0	35	0%
2	22	43	65	1,091	6.0%
2a	18	36	54	95	56.8%
2b	31	6	37	312	11.9%
2c	42	2	44	73	60.3%
3	7	4	11	6,290	0.2%
Total	120	91	211	7,896	2.7%

[1] As of September 1, 2024.

The 120 late-pending work orders are included in Appendix A. AT&T must provide ESRB with its corrective action plan to complete the 120 late-pending overhead work orders and its preventive measures to prevent any work orders from being completed late in the future.

2. **GO 128, Rule 17.1, Design, Construction and Maintenance** states:

   "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 review of AT&T's underground work orders from September 1, 2019 through September 1, 2024 found that 52 out of 1,593 (or 3.3%) underground work orders are late. Late-pending work orders are pending work orders that have not been completed by their assigned due date, and late-closed work orders are work orders that were completed past their assigned due date. Table 2 below breaks down the 52 late Underground work orders.

Table 2: Late Underground Facility Work Orders

	Late-Pending Work Orders[2]	Late-Complete Work Orders	Total Late Work Orders	Total Tags Created	Percentage Late
Total	5	47	52	1,593	3.3%

   The 5 late-pending work orders are included in Appendix B. AT&T must provide ESRB with its corrective action plan to complete the 5 late-pending underground work orders and its preventive measures to prevent any work orders from being completed late in the future.

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 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.

[2] As of September 1, 2024.

Inspection	*Tier 2*	*Tier 3*
Patrol	*2 Years*	*1 Year*
Detailed	*10 Years*	*5 Years*

For the purpose of implementing the patrol and detailed inspection intervals in the above Table, the term "year" is defined as 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months, not to exceed the end of the calendar year in which the next inspection is due."

ESRB's review of AT&T's patrol and detailed inspection records found that approximately 5,000 facilities within 64 Distribution Areas[3] in Tier 2 High Fire-Threat Districts (HFTD) were patrolled late in 2024. The list of late patrol inspections, categorized by Distribution Areas, is included in Appendix C.

4. **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."

AT&T lacks procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State. AT&T's patrol and detailed inspection procedures currently only satisfy inspection requirements in accordance with GO 95, Rule 80.1-A(1) for poles in HFTDs. AT&T is missing procedures for conducting patrol or detailed inspections for non-HFTD areas.

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

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

AT&T's inspection spreadsheets are missing the personnel who performed each inspection, and the personnel who performed each corrective action.

[3] AT&T Post Audit response 1.3 (1/23/2025) indicated an average of 78 facilities within each Distribution Area.

III. Field Inspection

During the field inspection from November 4 - 8, 2024, ESRB staff inspected AT&T's communication facilities in the locations listed in Table 3.

Table 3: Field Inspection Locations

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
1	Handhole	(36.7941900, -119.7201778)	Clovis
2	Handhole	(36.7942195, -119.7218042)	Clovis
3	Pedestal	(36.7942260, -119.7223118)	Clovis
4	Pole	(36.8132459, -119.7654048)	Fresno
5	Pole	(36.8136294, -119.7654042)	Fresno
6	Pole	(36.8136219, -119.7651202)	Fresno
7	Pole	(36.8136211, -119.7647192)	Fresno
8	Pole	(36.9646233, -119.4642732)	Humphreys Station
9	Pole	(36.9651229, -119.4654024)	Humphreys Station
10	Pole	(36.9652094, -119.4654001)	Humphreys Station
11	Pole	(36.9793785, -119.5258199)	Auberry
12	Pole	(36.9789639, -119.5256579)	Auberry
13	Pole	(36.9801723, -119.5253475)	Auberry
14	Pole	(36.9803574, -119.5247762)	Auberry
15	Pole	(36.9807209, -119.5250732)	Auberry
16	Pole	(36.7440493, -119.7366915)	Fresno
17	Cross Connect Box	(36.7440405, -119.7367330	Fresno
18	VRAD Box	(36.7440364, -119.7367867)	Fresno
19	Pole	(36.7440394, -119.7369580)	Fresno
20	Pole	(36.7440413, -119.7373788)	Fresno
21	Pole	(36.7440483, -119.7377895)	Fresno
22	Handhole	(36.7402259, -119.6878233)	Fresno
23	Pedestal	(36.7407358, -119.6885579)	Fresno
24	Cross Connect Box	(36.7412041, -119.6887091)	Fresno
25	Cross Connect Box	(36.7411921, -119.6886967)	Fresno
26	Vault	(36.7412262, -119.6887389)	Fresno
27	Pole	(36.7287244, -119.7021986)	Sunnyside

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
28	Pole	(36.7290337, -119.7022606)	Sunnyside
29	Pole	(36.7296205, -119.7023588)	Sunnyside
30	Pole	(36.6487891, -119.5802074)	Del Rey
31	Pedestal	(36.6487891, -119.5802074)	Del Rey
32	Pole	(36.6487985, -119.5801175)	Del Rey
33	Pole	(36.6484308, -119.5797735)	Del Rey
34	Pole	(36.6482664, -119.5800401)	Del Rey
35	Pole	(36.5749231, -119.6152759)	Selma
36	Pole	(36.5744958, -119.6152893)	Selma
37	Pole	(36.5739492, -119.6152806)	Selma
38	Pole	(36.5739611, -119.6146965)	Selma
39	Pole	(36.5735039, -119.6152642)	Selma
40	Pole	(36.4140817, -118.9028497)	Three Rivers
41	Pole	(36.4142752, -118.9037549)	Three Rivers
42	Pole	(36.4144884, -118.9040697)	Three Rivers
43	Pole	(36.4140985, -118.9022525)	Three Rivers
44	Pole	(36.4140615, -118.9017701)	Three Rivers
45	Pole	(36.4213172, -118.9129586)	Three Rivers
46	Pole	(36.4213038, -118.9120168)	Three Rivers
47	Pole	(36.4214791, -118.9112101)	Three Rivers
48	Pole	(36.4216218, -118.9194928)	Three Rivers
49	Pole	(36.4210904, -118.9199115)	Three Rivers
50	Pole	(36.4206919, -118.9202465)	Three Rivers
51	Pole	(36.3068382, -119.2114177)	Farmersville
52	Pole	(36.3061579, -119.2114338)	Farmersville
53	Pole	(36.3058261, -119.2114358)	Farmersville
54	Pedestal	(36.3247599, -119.3290614)	Visalia
55	Pole	(36.3214428, -119.6476944)	Hanford
56	Pole	(36.3035130, -119.7627525)	Lemoore
57	Pole	(36.3039056, -119.7627800)	Lemoore
58	Pole	(36.1405507, -118.6343384)	Pierpoint
59	Pole	(36.1409398, -118.6344772)	Pierpoint
60	Pole	(36.1393783, -118.6320807)	Pierpoint
61	Pole	(36.1389535, -118.6319895)	Pierpoint

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
62	Pole	(36.1389683, -118.6315258)	Pierpoint
63	Pole	(36.1385939, -118.6313682)	Pierpoint
64	Pole	(36.1388002, -118.6310162)	Pierpoint
65	Pole	(36.1261341, -118.8234627)	Springville
66	Pole	(36.1259180, -118.8234952)	Springville
67	Pole	(36.1258519, -118.8232206)	Springville
68	Pole	(36.1263919, -118.8234523)	Springville
69	Pole	(36.1264258, -118.8237114)	Springville
70	Pole	(36.1044563, -118.8187597)	Springville
71	Pole	(36.1051352, -118.8186196)	Springville
72	Pole	(36.1064608, -118.8186913)	Springville
73	Pole	(36.1024076, -118.8208767)	Springville
74	Pole	(36.1019723, -118.8203171)	Springville
75	Pole	(36.0664193, -119.0284662)	Porterville
76	Pole	(36.0664307, -119.0288642)	Porterville
77	Pole	(36.0662383, -119.0288840)	Porterville
78	Pole	(36.0694804, -119.0445742)	Porterville
79	Pole	(36.0694701, -119.0440180)	Porterville
80	Pole	(36.0694879, -119.0436549)	Porterville
81	Pole	(36.0693817, -119.0435570)	Porterville
82	Vault	(36.7509649, -120.3857927)	Mendota
83	Pole	(36.7511446, -120.3858179)	Mendota
84	Pole	(36.7507530, -120.3853254)	Mendota
85	Pole	(36.7506890, -120.3851641)	Mendota
86	Pole	(36.7504999, -120.3850675)	Mendota
87	Pole	(36.7500886, -120.3845975)	Mendota
88	Pole	(36.8512127, -120.4671351)	Firebaugh
89	Pole	(36.8512337, -120.4667613)	Firebaugh
90	Pole	(36.8512441, -120.4665748)	Firebaugh
91	Pole	(36.8512355, -120.4662992)	Firebaugh
92	Pole	(36.8512232, -120.4658356)	Firebaugh
93	Pole	(36.8512390, -120.4654808)	Firebaugh
94	Pole	(36.8514775, -120.4649796)	Firebaugh
95	Pole	(36.8512345, -120.4649296)	Firebaugh

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
96	Pedestal	(36.8670998, -120.4633418)	Firebaugh
97	Pedestal	(36.8671009, -120.4633662)	Firebaugh
98	Pedestal	(36.8672141, -120.4633626)	Firebaugh
99	Pole	(36.8672141, -120.4633626)	Firebaugh
100	Pedestal	(36.8672106, -120.4635416)	Firebaugh
101	Pedestal	(36.8667439, -120.4635681)	Firebaugh

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.*
>
> *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.*
>
> *A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard…"*

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

Table 4: GO 95, Rule 31.1 Findings

Location #	Findings
16	The fiber strand has detached from the span.
20	The overhead splice enclosure is disconnected from the main span.
21	The overhead splice enclosure is starting to detach from the main span.
37	The lashing wire is damaged. AT&T already has the open work order 1356085 to fix the issue. ESRB notes that this work order was due on March 25, 2024, and is late.
40	The pole is leaning significantly. AT&T already has the existing work order 761481 to fix the issue. ESRB notes that this work order was due on September 11, 2021, and is late.
47	The animal guard is falling off.
48	The splice enclosure is open.

Location #	Findings
50	AT&T needs to transfer its facilities to the new pole.
59	The lashing wire is loose.
63	The splice connections require a proper permanent enclosure. They are currently covered in a black plastic bag. Additionally, the service drop is wrapped around a pole step.
65	AT&T's span is supported by rope.
68	The top of the pole is rotten.
70	AT&T needs to transfer its facilities to the new pole. The old pole is leaning significantly.
71	AT&T needs to transfer its facilities to the new pole. The old pole is leaning significantly. AT&T's lashing wire is broken.
72	AT&T needs to transfer its facilities to the new pole. The splice enclosure is damaged.
73	AT&T needs to transfer its facilities to the new pole or install a new pole. The old pole is completely split in half at the top and the anchor guys are broken. AT&T already has the existing work order 1031156 to address the issue. ESRB notes this work order was due on October 20, 2022, and is late.
78	The bottom of the splice enclosure is damaged. AT&T's lashing wire is broken.
80	The overhead enclosure is detached from the span. The pole is also missing visibility strips.
81	The pole is missing visibility strips and appears to have been hit by a car (damaged riser cover).
92	The pole is leaning more than 10%.
95	The pole is deteriorating.
99	AT&T needs to transfer its facilities to the new pole.
Hwy 190, Springville, CA	There are several significantly deteriorated and/or leaning poles near and along Hwy 190 in Springville, CA. SCE has placed several new poles in this area, but AT&T has not transferred its facilities to the new poles. AT&T indicated that it plans to remove 34 poles and transfer 24 poles by the Q1 2025.

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 2:

Table 2: GO 95, Rule 31.6 Findings

Location #	Findings
6	There is an abandoned service drop.
9	The telephone riser cable and vertical ground wire are cut and abandoned.
27	There is an abandoned service drop.
28	There is an abandoned service drop.
33	There are multiple abandoned facilities on the pole.
34	There are multiple abandoned facilities on the pole.
40	There is an abandoned service drop.
43	There is an abandoned service drop.
46	There is an abandoned service drop.
47	There are two abandoned service drops.
61	There are abandoned service drops.
67	There is an abandoned service drop.
68	There is an abandoned service drop.
69	There is an abandoned service drop.

Location #	Findings
83	There is an abandoned service drop.
95	There are multiple abandoned facilities on the pole.

3. GO 95, Rule 35, Vegetation Management states 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 finding related to the above rule is listed in Table 3:

Table 3: GO 95, Rule 35 Finding

Location #	Finding
28	The tree is causing strain on the telephone span.

4. GO 95, Rule 37, Table 1, Case 4.B requires the following:

The vertical clearance for communication conductors above areas capable of being traversed by agricultural clearance is 15 feet.

ESRB's findings related to the above rule are listed in **Error! Reference source not found.**:

Table 4: GO 95, Table 1, Case 4.B Findings

Location #	Findings
90	The telephone span is about 13 feet above the farmland. AT&T already has the existing work order 758475 to address the issue by September 4, 2025.
91	The telephone span is about 12.5 feet above the farmland.

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

   The clearance between communication conductors not supported on the same poles is 24 inches.

   ESRB's finding related to the above rule is listed in Table 8:

Table 8: GO 95, Table 2, Case 3.C Finding

Location #	Finding
60	AT&T's span is contacting Charter's span.

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

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

   ESRB's findings related to the above rule are listed in Table 9**Error! Reference source not found.**:

Table 9: GO 95, Table 2, Case 16.C Findings

Location #	Findings
40	AT&T's span is contacting the cable TV company's cable span.
63	AT&T's service drop is contacting the cable TV company's cable span.
64	A tree is pushing AT&T's and the cable TV company's cable spans together.
65	AT&T's span is contacting the cable TV company's cable span.

Location #	Findings
66	AT&T's span is contacting the cable TV company's cable span.
68	AT&T's service drops are contacting the other communication company's facilities.
75	AT&T's service drops are contacting the other communication company's facilities.
77	AT&T's span is contacting the cable TV company's cable span.
99	AT&T's splice box is wrapped into the cable TV company's cable span.

7. **GO 95, Rule 84.4-A(3), Clearances, Accessible to Pedestrians Only** states:

   "Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet."

   ESRB's finding related to the above rule is listed in Table 10**Error! Reference source not found.**:

Table 10: GO 95, Rule 84.4-A(3) Finding

Location #	Finding
27	The span is less than 8 feet above ground and is entangled in a bush. AT&T already has the existing work order 1199402 to address the issue by December 8, 2025.

8. **GO 95, Rule 84.4-A(1), Clearances, Above Ground, Over, across, or along Public Thoroughfares,** states in part:

   "Over, across or along Public Thoroughfares: Minimum clearance shall not be less than 18 feet (Table 1, Case 3, Column A).

   EXCEPTIONS: (a) A minimum clearance of 16 feet is permitted over an entrance to or exit from industrial or commercial premises."

   ESRB's findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 84.4-A(1) Findings

Location #	Findings
6	The telephone span along the throughfare is less than 18 feet above the road.
11	The telephone span across the throughfare is less than 18 feet above the road. AT&T already has the existing work order 523900 to address this issue. ESRB notes that this work order was due on October 10, 2024, and is late
48	The telephone span crosses the road and is less than 16 feet above the commercial campground's entrance. ESRB notes that the road appears to be recently regraded.

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

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

ESRB's findings related to the above rule are listed in Table 12:

Table 12: GO 95, Rule 84.4-A(6) Findings

Location #	Findings
8	The telephone span crosses the road and is only 14.5 feet above the road. AT&T already has the existing work order 1429167 to address the issue. ESRB notes that there is a discrepancy with the dates in AT&T's records since the work order shows it was created on February 19, 2024, but due on July 31, 2023.
46	The telephone span crosses the road and is only 15 feet above the road.
51	The telephone span along the thoroughfare is only 14.5 feet above the curb. AT&T already has the existing work order 797645 to address this issue. ESRB notes that this work order was due on March 8, 2024, and is late.

10. 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 13:

Table 13: GO 95, Rule 84.6-B Findings

Location #	Findings
9	The ground moulding is damaged at the base of the pole.
27	The ground moulding is missing.

11. GO 95, Rule 84.6-D Vertical Runs states in part:

"Runs of bridled conductors, attached to surface of pole, need not be covered provided such runs are below the guard arm and in the same quadrant as the longitudinal cable, or where such runs are below and on the same side of pole with a cable arm and are not in the climbing space, or are connected to service drops which are placed in accordance with the provisions of Rule 84.8–B2b. Where bridled runs are not required to be covered by these rules, they 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 14:

Table 14: GO 95, Rule 84.6-D Findings

Location #	Findings
11	The vertical run is not secured at intervals of not more than 24 inches.

Location #	Findings
30	The vertical run is not secured at intervals of not more than 24 inches.
34	The vertical run is not secured at intervals of not more than 24 inches.
76	The vertical run is not secured at intervals of not more than 24 inches.
77	The vertical run is not secured at intervals of not more than 24 inches.
83	The vertical run is not secured at intervals of not more than 24 inches.

12. GO 95, Rule 84.8-C(1) – Service Drops, Clearances above Ground and Buildings, Above Public Throughfares, states:

"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."

ESRB's findings related to the above rule are listed in Table 15:

Table 15: GO 95, Rule 84.8-C(1) Findings

Location #	Findings
6	The service drop across the alley is less than 16 feet above the road.
20	The service drop crosses the road and is only 15 feet above the road.

13. GO 95, Rule 84.8-C(3)(b) – Service Drops, Above Ground in Areas Accessible to Pedestrians Only, Residential Premises, states:

"Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet.

EXCEPTION: If the building served does not permit an attachment which will provide this10 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 8 feet 6 inches."

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

Table 16: GO 95, Rule 84.8-C(3)(b) Findings

Location #	Findings
5	The service drop across the sidewalk is less than 8 feet and 6 inches above ground. AT&T already has the work order 1141269 to correct the issue by July 12, 2025.
35	The service drop to the home is less than 8 feet and 6 inches from the ground.
74	The service drop to the landfill is less than 8 feet and 6 inches from the ground.

14. GO 95, Rule 84.8-C(4) – Service Drops, From Buildings and Structures, states in part:

"Service drops should be arranged so as not to hamper or endanger firefighters and workers in performing their duties[...]

Service drops are not required to clear the roofs of buildings on the premises served any specified vertical distance."

ESRB's finding related to the above rule is listed in Table 17:

Table 17: GO 95, Rule 84.8-C(4) Finding

Location #	Finding
55	AT&T's service drop is contacting and lying on top of the customer's roof.

15. 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 are Table 18:

Table 18: GO 95, Rule 86.2 Findings

Location #	Findings
43	The anchor guy is slacked.
70	The anchor guy is slacked.

16. GO 95, Rule 86.4-C(4), Clearances, Passing on Same Poles states:

> *"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 finding related to the above rule is listed in Table 19:

Table 19: GO 95, Rule 86.4-C(4) Finding

Location #	Finding
10	The telephone span is less than three inches from PG&E's anchor guy.

17. 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 findings related to the above rule are listed in Table 20:

Table 20: GO 95, Rule 86.9 Findings

Location #	Findings
38	The anchor guy is missing a marker.
42	The anchor guy is missing a marker.
48	The anchor guy is missing a marker.
53	The anchor guy is missing a marker.
68	The anchor guy is missing a marker.
70	The anchor guy is missing a marker.
81	The anchor guy is missing a marker.
88	The anchor guy is missing a marker.
93	The marker on the anchor guy is not 8 feet in length.

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

> *"On poles which carry no supply conductors or crossarms, communication cables or messengers may be attached to the sides of poles in any position within 3 feet of the top of the pole provided metal–sheathed cables or messengers are separated from open wire conductors in this section of the pole by a vertical distance of not less than 12 inches."*

ESRB's finding related to the above rule is listed in Table 21:

Table 21: GO 95, Rule 87.4-C(3) Finding

Location #	Finding
43	The spacing between the different communication cables on the pole are less than 12 inches.

19. 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 22:

Table 22: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
14	The riser cover stops below 8 feet.
39	The riser cover is detaching from the pole and exposes the riser cable.
57	The riser cover is missing.
81	The riser cover is damaged.
84	The riser cover is detaching from the pole and exposes the riser cable.
88	The riser cover is missing.
94	The riser cover stops below 8 feet.

20. GO 95, Rule 91.3 – C, Joint Poles or Poles Jointly Use, Stepping states in part:

"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be

installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the step."

ESRB's finding related to the above rule is listed in Table 23:

Table 23: GO 95, Rule 91.3-C Finding

Location #	Finding
57	The pole step is less than 8 feet from the ground line.

21. GO 95, Rule 91.5, Marking states:

"Each communication cable and conductor as defined by Rules 20.4, 20.6(A), 20.9, 84.1, 87.4(C), and 89.1 that is attached to a joint- use pole shall be marked as to ownership. The marker shall (1) identify the owner of the cable and/or conductor; (2) provide a 24 hour contact number for emergencies or information; (3) be made of weather and corrosion resistant material; and (4) be clearly visible to workers who climb the pole or ascend by mechanical means. This marking requirement applies only to (A) new construction, (B) reconstruction of facilities, and (C) existing aerial communication cables and conductors that a technician works on when the technician ascends the joint-use pole for regular maintenance."

ESRB's finding related to the above rule is listed in Table 24:

Table 24: GO 95, Rule 91.5 Finding

Location #	Finding
4	AT&T's cable is not marked for ownership.

22. GO 95, Rule 92.4-C(2), Grounding, Ground Rods (Grounding Electrodes) states in part:

"Ground rods on the communication messenger system(s) shall conform to each of the following requirements […]

(c) Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground."

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

Table 25:

Table 25: GO 95, Rule 92.4-C(2) Findings

Location #	Findings
43	The ground rod is exposed above ground.
53	The ground rod is exposed above ground.

23. GO 128, Rule 17.1, Design, Construction and Maintenance states in part:

"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service."

ESRB's findings related to the above rule are listed in Table 26:

Table 26: GO 128, Rule 17.1 Findings

Location #	Findings
1	The handhole lid broke when opening the facility during the audit.
17	The back panel of the cross connect box was not secured. AT&T immediately fixed the issue during the audit.
38	There is an abandoned pedestal.
82	The vault lid is not flush with the sidewalk and is imbedded into the concrete sidewalk. This prevents the opening and closing of one side of the vault lid and is also a trip hazard. AT&T already has the existing work order 1535084 to correct the issue. ESRB notes that this work was due on August 8, 2024, and is late.
96	The pedestal is broken.

24. 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 27:

Table 27: GO 128, Rule 17.8 Findings

Location #	Findings
3	The pedestal is missing ownership identification
23	The pedestal is missing ownership identification. AT&T immediately added an ownership label to the pedestal during the audit and fixed the issue.
31	The pedestal is missing ownership identification. AT&T immediately added an ownership label to the pedestal during the audit and fixed the issue.
96	The pedestal is missing ownership identification.
97	The pedestal is missing ownership identification. AT&T immediately added an ownership label to the pedestal during the audit and fixed the issue.
98	The pedestal is missing ownership identification. AT&T immediately added an ownership label to the pedestal during the audit and fixed the issue.
100	The pedestal is missing ownership identification. AT&T immediately added an ownership label to the pedestal during the audit and fixed the issue.
101	The pedestal is missing ownership identification. AT&T immediately added an ownership label to the pedestal during the audit and fixed the issue.

V. Observations

1. **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."

ESRB observed the following third-party findings during the audit. AT&T must issue third-party notifications to the respective utilities for these findings. ESRB's findings related to the above rule are listed in Table 28:

Table 28: GO 95, Rule 18-A Findings

Location #	Findings
5	Comcast's ground wire is missing at the base of the pole.
6	PG&E's insulator skirt is damaged. ESRB immediately notified PG&E about the issue during the audit. PG&E created a Priority X EC tag to repair the issue.
7	PG&E's insulator skirt is damaged. The crossarm is also rotting and the secondary bus strap is loose. ESRB immediately notified PG&E about the issue during the audit. PG&E created a Priority X EC tag to repair the issue.
9	PG&E's pole has a significant amount of woodpecker holes.
11	Ponderosa Telephone Company's telephone loop and splice enclosure are contacting AT&T's facilities.
14	There is a large woodpecker hole on PG&E's pole near the top crossarm's through bolt.
16	Vegetation is contacting above PG&E's anchor guy insulator.

19	Comcast's cable is wrapped around AT&T's anchor guy. Additionally, the cables coming out of Comcast's tap are less than three inches from AT&T's telephone span.
20	The cables coming out of Comcast's tap are less than three inches from AT&T's telephone span.
29	Comcast's service drop is low across the customer's backyard.
35	Comcast's service drop is contacting AT&T's service drop.
37	Comcast's riser cover is damaged near the ground surface.
38	PG&E's service drop shows signs of arcing. ESRB notified PG&E about the issue during the audit, but PG&E indicated there was no issue with the service drop. The cables coming out of Comcast's tap are less than three inches from AT&T's telephone span.
39	Comcast's cable riser is not secured to the pole every 24 inches.
43	The cable TV company's facilities are less than one foot from AT&T's facilities the at the pole attachment.
49	There is an abandoned electric service drop to a streetlight.
52	The cable TV company's ground wire is disconnected.
55	The cable TV company has a loose span clap at pole.
56	Comcast's service drop is contacting AT&T's span. Comcast's service drop has also disconnected from its hook and is being supported by a plastic zip tie.
58	SCE's crossarm appears to be rocked (tilted). There is also minor conductor bird-caging near the center phase splice.
61	There is an uncovered and potentially abandoned coaxial cable mounted to the pole.
63	The cable TV company's span is contacting AT&T's span. SCE's pole step is less than 8 feet from the ground surface.
64	Spectrum's facilities are only 14 feet above the road.

75	The cable TV company's span is contacting AT&T's span.
76	The cable TV company's span is contacting AT&T's span. The cable TV company's span is also low across the road.
85	The cable TV company's ground moulding is damaged and exposes the ground wire.
87	Comcast's service drop is contacting PG&E's service drop. Comcast's anchor guy is loose.

2. **GO 95, Rule 44.4, Cooperation** states in part:

"All entities with facilities on the subject pole shall cooperate with the company performing the load calculations necessitated by the provisions of Rule 44.1, 44.2 or 44.3,"

In the Post-Audit Data Request issued on November 26, 2024, ESRB requested pole loading calculations for Location 42 (located at 36.414436, -118.903984 in front of 42482 S Fork Dr, Three Rivers, CA) and Location 60 (located at 36.1394009, -118.6321043 on the farthest pole west of 215 Cedar Dr, Springville, CA). AT&T provided responses on January 23, 2025, and ESRB observed that the calculations provided were for the incorrect poles. AT&T must provide the pole loading calculations for the correct poles.

Figure 1: Location 42

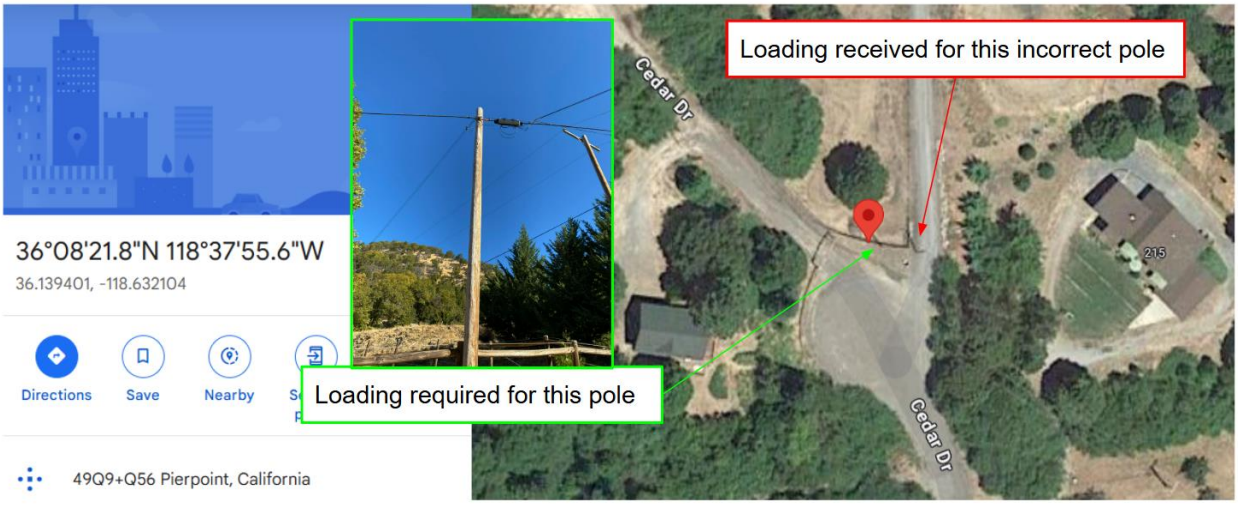

Figure 2: Location 60

Appendix A: Late-Pending Overhead Facility Work Orders

Work Order Package ID	Priority	HFTD Tier	Creation Date	Due Date	Number of Days Late*
523648	2c	2	12/10/2019	10/10/2020	1422
523647	2c	2	12/10/2019	10/10/2020	1422
540005	2a	2	1/1/2020	11/1/2020	1400
540017	2b	2	1/1/2020	11/5/2020	1396
540845	2b	2	1/2/2020	11/5/2020	1396
540840	2a	2	1/2/2020	11/5/2020	1396
540024	2b	2	1/1/2020	11/5/2020	1396
540841	2a	2	1/2/2020	11/6/2020	1395
757080	2c	2	1/12/2021	9/2/2021	1095
757077	2c	2	1/12/2021	9/2/2021	1095
757078	2c	2	1/12/2021	9/2/2021	1095
755522	2b	2	1/9/2021	9/3/2021	1094
755523	2b	2	1/9/2021	9/3/2021	1094
755509	2b	2	1/9/2021	9/3/2021	1094
755521	2b	2	1/9/2021	9/3/2021	1094
755494	2b	2	1/9/2021	9/4/2021	1093
757075	2c	2	1/12/2021	9/9/2021	1088
757076	2c	2	1/12/2021	9/9/2021	1088
761482	2a	2	1/21/2021	9/11/2021	1086
761481	2a	2	1/21/2021	9/11/2021	1086
757000	2b	2	1/12/2021	9/15/2021	1082
473825	2	1	9/22/2019	9/21/2022	711
517875	2	2	11/28/2019	10/12/2022	690
1031280	2b	2	1/27/2022	10/19/2022	683
1031156	2c	2	1/27/2022	10/20/2022	682
1031250	2b	2	1/27/2022	10/20/2022	682
1031214	2a	2	1/27/2022	10/20/2022	682
1031037	2b	2	1/27/2022	10/21/2022	681
1030891	2a	2	1/27/2022	10/21/2022	681
1030949	2b	2	1/27/2022	10/21/2022	681
1031281	2a	2	1/27/2022	10/21/2022	681
1030955	2b	2	1/27/2022	10/25/2022	677
1031410	2b	2	1/27/2022	10/26/2022	676
540560	2	2	1/1/2020	11/1/2022	670
540604	2	2	1/1/2020	11/1/2022	670
540574	2	2	1/1/2020	11/1/2022	670
540575	2	2	1/1/2020	11/1/2022	670
540958	2	2	1/2/2020	11/4/2022	667
540596	2	2	1/1/2020	11/4/2022	667
540570	2	2	1/1/2020	11/4/2022	667
540963	2	2	1/2/2020	11/5/2022	666

540569	2	2	1/1/2020	11/5/2022	666
540962	2	2	1/2/2020	11/5/2022	666
540600	2	2	1/1/2020	11/5/2022	666
540954	2	2	1/2/2020	11/5/2022	666
540583	2	2	1/1/2020	11/5/2022	666
540956	2	2	1/2/2020	11/6/2022	665
1020634	2c	2	1/12/2022	12/6/2022	635
1021020	2c	2	1/12/2022	12/16/2022	625
1073102	2c	2	3/23/2022	1/23/2023	587
1073107	2b	2	3/23/2022	1/23/2023	587
1072522	2b	2	3/23/2022	1/24/2023	586
1072972	2a	2	3/23/2022	1/24/2023	586
1072524	2a	2	3/23/2022	1/24/2023	586
1073113	2b	2	3/23/2022	1/25/2023	585
1073110	2b	2	3/23/2022	1/25/2023	585
1075711	2c	2	3/25/2022	1/25/2023	585
1075703	2a	2	3/25/2022	1/25/2023	585
1075765	2c	2	3/25/2022	1/25/2023	585
1072382	2c	2	3/23/2022	1/26/2023	584
1072383	2b	2	3/23/2022	1/26/2023	584
1072692	2a	2	3/23/2022	1/26/2023	584
1066903	2c	2	3/18/2022	1/27/2023	583
1072759	2c	2	3/23/2022	1/27/2023	583
1075673	2c	2	3/25/2022	1/27/2023	583
1084576	2c	2	3/31/2022	1/27/2023	583
1084369	2c	2	3/31/2022	1/28/2023	582
1084700	2c	2	3/31/2022	1/31/2023	579
1066810	2b	2	3/18/2022	1/31/2023	579
1066951	2c	2	3/18/2022	1/31/2023	579
1072451	2c	2	3/23/2022	2/1/2023	578
1084418	2c	2	3/31/2022	2/1/2023	578
1084377	2a	2	3/31/2022	2/1/2023	578
1084380	2c	2	3/31/2022	2/1/2023	578
1084475	2c	2	3/31/2022	2/2/2023	577
1066658	2b	2	3/18/2022	2/2/2023	577
1076004	2c	2	3/25/2022	2/3/2023	576
1073320	2c	2	3/23/2022	2/3/2023	576
1075108	2c	2	3/25/2022	2/4/2023	575
1075357	2c	2	3/25/2022	2/5/2023	574
1075760	2b	2	3/25/2022	2/8/2023	571
1073271	2c	2	3/23/2022	2/9/2023	570
1075820	2a	2	3/25/2022	2/9/2023	570
1075882	2c	2	3/25/2022	2/9/2023	570
1084993	2c	2	3/31/2022	2/9/2023	570
1073265	2a	2	3/23/2022	2/9/2023	570

1084947	2c	2	3/31/2022	2/9/2023	570
1084918	2a	2	3/31/2022	2/9/2023	570
1085023	2a	2	3/31/2022	2/10/2023	569
1084711	2c	2	3/31/2022	2/12/2023	567
1084680	2c	2	3/31/2022	2/12/2023	567
1084447	2c	2	3/31/2022	2/14/2023	565
1075207	2c	2	3/25/2022	2/16/2023	563
1075208	2c	2	3/25/2022	2/16/2023	563
1084287	2c	2	3/31/2022	2/16/2023	563
1084362	2b	2	3/31/2022	2/17/2023	562
1084398	2c	2	3/31/2022	2/17/2023	562
1084406	2b	2	3/31/2022	2/18/2023	561
1084832	2c	2	3/31/2022	2/24/2023	555
1127374	2c	1	6/9/2022	6/9/2023	450
1142571	2a	1	7/18/2022	7/18/2023	411
1429168	2b	2	2/19/2024	7/31/2023	398
1429167	2b	2	2/19/2024	7/31/2023	398
755969	2	2	1/9/2021	9/4/2023	363
758660	2	2	1/13/2021	9/4/2023	363
758687	2	2	1/13/2021	9/4/2023	363
757472	2	2	1/12/2021	9/9/2023	358
761969	2	2	1/21/2021	9/11/2023	356
737622	2	1	12/5/2020	12/4/2023	272
797645	2b	1	3/9/2021	3/8/2024	177
1352421	2b	1	9/18/2023	3/18/2024	167
1353150	2b	1	9/19/2023	3/19/2024	166
1356085	2b	1	9/25/2023	3/25/2024	160
482077	3	2	10/8/2019	6/24/2024	69
482076	3	2	10/8/2019	6/24/2024	69
491122	3	2	10/23/2019	6/28/2024	65
491491	3	2	10/23/2019	6/28/2024	65
491331	3	2	10/23/2019	6/28/2024	65
491475	3	2	10/23/2019	6/28/2024	65
490116	3	2	10/22/2019	7/2/2024	61

*As of September 1, 2024

Appendix B: Late-Open Underground Facility Work Orders

Work Order Package ID	Creation Date	Due Date	Number of Days Late*
1051579	3/3/2022	3/6/2022	910
1191654	11/27/2022	11/30/2022	641
1452606	4/4/2024	4/7/2024	147
1481901	5/24/2024	5/27/2024	97
1535084	8/5/2024	8/8/2024	24

*As of September 1, 2024

Appendix C: Late Patrol Inspections in a Tier 2 HFTD

DA_PSA_CD[4]	UN_DA_NA[4]	Last patrol or detailed inspection	Most recent patrol
2002	NZPR1224	2/6/2022	6/6/2024
2004	NZPR3105	2/8/2022	6/3/2024
110201	NAH2002	2/23/2022	6/14/2024
110301	NZPR1228	2/9/2022	6/6/2024
110501	NCQR4110	2/3/2022	6/13/2024
140101	NCQR2911	2/1/2022	6/14/2024
140201	NZPR1134	2/11/2022	6/5/2024
210101	NZP312101	1/27/2022	6/4/2024
210601	NZP110301	2/2/2022	6/4/2024
212001	NCQR4401	2/3/2022	6/13/2024
230701	NZP314102	2/5/2022	6/3/2024
232001	NCQ410101	2/1/2022	6/13/2024
310101	NPV232001	1/30/2022	5/28/2024
310301	NOIR2135	2/3/2022	6/7/2024
310401	NZPR1154	2/7/2022	6/5/2024
310901	NAH2004	2/23/2022	6/14/2024
312101	NCQR4901	2/4/2022	6/14/2024
314101	NZP310301	1/26/2022	6/3/2024
340101	NZPR1225	2/7/2022	6/6/2024
370301	NCQR4301	2/2/2022	6/13/2024
410501	NZP122101	2/5/2022	6/6/2024
1801R	NZPR1201	1/29/2022	6/4/2024
5501R	NZPR1114	2/9/2022	6/5/2024
5527R	NPV210601	1/28/2022	5/20/2024
5601R	NCQ210101	2/1/2022	6/13/2024
5721R	NZPR1141	2/10/2022	6/5/2024
5816R	NTR310101	1/29/2022	5/23/2024
R1105	NZP110401	2/4/2022	6/6/2024
R1106	NZPR1107	2/6/2022	6/4/2024
R1108	NZPR1156	2/9/2022	6/5/2024
R1113	NCQR2912	2/2/2022	6/14/2024
R1114	NAH1001	1/25/2022	6/14/2024
R1116	NWER1116	1/27/2022	5/31/2024
R1117	NWER1117	1/30/2022	5/31/2024
R1119	NWER1119	1/28/2022	5/31/2024
R1141	NZPR1106	2/2/2022	6/4/2024
R1146	NZPR3106	2/3/2022	6/3/2024
R1147	NPVR1146	1/31/2022	5/25/2024

[4] The DA_PSA_CD and UN_DA_NA are unique identifiers assigned by AT&T and are used to organize areas requiring patrol and detailed inspections.

R1153	NPV212001	1/25/2022	5/21/2024
R1154	NCQR4902	2/4/2022	6/14/2024
R1201	NZPR1105	2/2/2022	6/4/2024
R1201	NZPR1132	2/10/2022	6/5/2024
R1208	NAH0899	2/23/2022	6/14/2024
R1224	NOIR2129	1/26/2022	6/7/2024
R1225	NZPR1113	2/9/2022	6/6/2024
R1408	NPVR3133	1/26/2022	5/23/2024
R2129	NZP314101	2/2/2022	6/3/2024
R2130	NZP110201	1/31/2022	6/4/2024
R2135	NPVR1147	1/26/2022	5/28/2024
R2701	NZPR3125	2/7/2022	6/1/2024
R2703	NZPR3143	2/6/2022	6/3/2024
R2911	NZPR1140	2/9/2022	6/6/2024
R2912	NZPR1131	2/11/2022	6/5/2024
R3106	NPV290601	1/28/2022	5/28/2024
R3107	NPV370301	1/28/2022	5/21/2024
R3109	NZPR1153	2/9/2022	6/5/2024
R3111	NZPR1111	2/8/2022	6/6/2024
R3125	NZPR1108	2/10/2022	6/5/2024
R3133	NZPR3107	1/28/2022	5/31/2024
R3143	NPV240701	1/29/2022	5/21/2024
R3201	NCQ410501	2/2/2022	6/13/2024
R3206	NPV270101	1/30/2022	5/25/2024
R3404	NOIR2130	2/2/2022	6/7/2024
R4301	NTR310401	1/29/2022	5/22/2024