

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 14, 2025
CA2024-1297

Ms. Lisa Ludovici
Director, Government Affairs
Charter Communications
270 Bridge Street
San Luis Obispo, CA 93401

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Charter Communication's Bakersfield Service Area

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Gordon Szeto and Nora Nyguen of ESRB staff conducted an CIP audit of Charter Communication's Bakersfield Service Area from October 28, 2024, through November 1, 2024. During the audit, ESRB staff conducted field inspections of Charter's facilities and equipment and reviewed pertinent documents and records.

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

Please provide a response no later than February 13, 2025, via electronic copy of all corrective actions and preventive measures taken by Charter to correct the identified violations and prevent the recurrence of such violations and observations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Gordon Szeto at (415) 603-9855 or gordon.szeto@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 Audit Findings of Charter Communication's Bakersfield Service Area

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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**CPUC AUDIT FINDINGS OF
CHARTER COMMUNICATIONS – BAKERSFIELD SERVICE AREA
OCTOBER 28 – NOVEMBER 1, 2024**

I. Records Review

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

- A description of Charter Communications Overhead and Underground Maintenance Program.
- Charter’s Facility Statistics for its Bakersfield Service Area as of October 2024, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Charter’s Bakersfield Service Area Facility Maps as of October 2024.
- Charter’s Bakersfield Service Area Inspection Data containing data for the inspected facility type, facility location, fire threat district location, and inspection date from August 2019 through August 2024.
- Charter’s overhead and underground work orders created between August 2019 through August 2024.
- Safety Hazards Notifications Charter Received from Third Party Utilities from August 2019 through August 2024.
- Safety Hazard Notifications Charter Sent to Third Party Utilities from August 2019 through August 2024.
- Charter’s new construction projects in the Bakersfield Service Area from August 2019 through August 2024.

II. Records Violations

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

1. GO 95, Rule 21.2, Districts, states in part:

“D. High Fire-Threat District means those areas comprised of the following:

(1) Zone 1 is Tier 1 of the latest version of the United States Forest Service (USFS) and CAL FIRE’s joint map of Tree Mortality High Hazard Zones (HHZs). (Note: The Tree Mortality HHZs Map may be revised regularly by the USFS and CAL FIRE.)

(2) Tier 2 is Tier 2 of the CPUC Fire-Threat Map.

(3) Tier 3 is Tier 3 of the CPUC Fire-Threat Map.”

ESRB Finding:

a) ESRB reviewed Charter’s SPIDA inspection records database for Detailed Inspections, Patrols and Third-Party Notifications received. Specific attention was focused on the Tehachapi area which is in a High Fire Threat District (HFTD). The SPIDA inspection database had 2,064 records for aerial pole structures, of which 481 had repeat pole IDs indicating a repeat inspection. This gave a total net of 1,603 pole structures with poles tracked. The 1,603 pole structures for Tehachapi is inconsistent with 749 pole structures listed in Charter’s Overall Statistics for the Bakerfield Service Area in the response to Pre-Audit Data Request Question 2. Charter should resolve this discrepancy.

a)b) ESRB performed a small sample size review (about 150 records) of Charter’s Bakersfield Region SPIDA inspection records from August 2019 through August 2024 and found 15 records where the listed HFTD Tier Level was not accurate based on the noted Latitude and Longitude. The Charter records had a lower HFTD Tier Level than identified by the CPUC High Fire Threat District Map. Facility HFTD Tier Level assignments must be accurate and are necessary to determine their inspection and repair intervals. Table 1 provides an example of records where Charter recorded HFTD that did not accurately reflect the correct HFTD Tier Level. Charter should review their HFTD Tier Level assignments in the SPIDA database versus the CPUC HFTD Map. The Fire-Threat Map and Geographic Information System data can be found on the CPUC’s “Fire-Threat Maps and Fire-Safety Rulemaking” website. Also, the SPIDA database should clearly list the Tier Level, rather than just having a column identifying “Yes” or “No” to “High Fire”.

Table 1: Incorrectly Listed HFTD Tier Level

Address	Latitude	Longitude	SPIDA Fire Threat Tier	CPUC Map HFTD Tier
20800 Schout Rd	35.11671	-118.50009	2	3
20502 Tiffany Circle	35.11674	-118.49777	2	3
20430 Steeple Court	35.1281	-118.4941	2	3

19261 Alta Vista Ave	35.128951	-118.47324	2	3
20902 Old Town Rd	35.12373083	-118.51274	2	3
21230 Golden Hills Blvd	35.12766	-118.48583	2	3
22301 Milky Way	35.14365421	-118.47974	2	3
20430 Steeple Court	35.1281	-118.4941	2	3
19271 W Valley Blvd	35.12443	-118.47257	2	3
22881 Jerry Drive	35.1521834	-118.47779	2	3
21230 Woodford Tehachapi Rd	35.12853	-118.49485	2	3
20001 W Valley Blvd	35.12495	-118.48628	2	3
19532 Water Canyon Rd	35.10198	-118.49016	2	3
19569 Cherry Lane	35.12067	-118.47812	2	3
Turf St 4	35.12456913	-118.42329	1	2

2. 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.”

ESRB Finding:

-Charter states in their CPUC Inspection Compliance Program, North West Region, Patrols will be done annually (Tier 3) and every 2 years (Tier 2) to record major safety non-compliance issues. The SPIDA database record shows that there were 148 Patrols performed, each with a finding recorded. However, there were no records of Patrols where there were no findings. This does not comply with GO 95 Rule 18-B that the Maintenance Program be **auditable** and 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, even if there were no findings. The record must identify the pole/facility that was patrolled even if there was not a finding. Also, it was noted that the SPIDA records for some Detailed Inspections did not record the pole number, but listed “NT” in the column for “pole number”. The inspection record should list the pole number of the pole inspected, which should be available in the inspection database from the address and Latitude and Longitude information. This will ensure the inspection record is auditable, and if there are any future or past issues with the pole, it can be traced to the inspection record.

3. 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, Inspection Requirements for Communication Lines states in part:

“A. Patrol and Detailed Inspections

(1) Inspection Requirements for Joint-Use Poles in High Fire-Threat District 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.

<i>Inspection</i>	<i>Tier 2</i>	<i>Tier 3</i>
<i>Patrol</i>	<i>2 Years</i>	<i>1 Year</i>
<i>Detailed</i>	<i>10 Years</i>	<i>5 Years</i>

Inspections in the High Fire-Threat District shall be planned and conducted in accordance with the statewide inspection requirements and procedures described in Rule 80.1-A(2), below.

Each company’s procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.

~~(2)~~ Statewide Inspection Requirements:

~~(3)~~(2) *Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following factors:*

- Fire threat*
- Proximity to overhead power line facilities*
- Terrain*
- Accessibility*
- Location, including whether the Communications Lines are located in the High Fire-Threat District*

Each company that discovers a safety hazard on or near a communications facility or electric facility involving another company while performing inspections of its own facilities pursuant to this rule shall notify the other

company and/or facility owner of such safety hazard in accordance with Rule 18-A3.

Each company’s procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.”

ESRB Finding:

a) -The 2,064 pole inspection records for Tehachapi shows 248 non-HFTD locations (listed as “No” for “High Fire”) and 1,816 HFTD locations (“Yes” for ”High Fire”). However, the SPIDA database indicated that there were 358 HFTD Tier 3 locations (based on the “Status 2” column with entries for “Start 4 Year Countdown”, which shows a Detailed Inspection in a Tier 3 location) and 1,200 HFTD Tier 2 locations (based on the “Start 9 Year Countdown”, which shows a Detailed Inspection in a Tier 2 location). To comply with GO 95 Rule 80.A(1) requirements over a five year period, there should be about 1790 Tier 3 inspections (358 Detailed Inspections + 1432 Patrols (i.e., 4 x 358)), and about 3000 Tier 2 inspections ((1200 Detailed Inspections x 0.5) + (1200 Patrols x 2)). The total inspections over five years for Tehachapi should be about 5038 (1790 Tier 3 + 3000 Tier2 + 248 Tier1). The 2,064 total pole inspection records for Tehachapi falls well short of the 5038 records that would be expected, indicating Charter is not in compliance with GO 95, Rule 80.1-A(1). Some examples of Tier 3 sites where no Patrols were done in 2019-2024 are listed in Table 2.

Table 2: Examples of Tier 3 Sites Where No Record of Patrols Found Aug 2019 to Aug 2024

Address	Latitude	Longitude	Pole#	HFTD Tier
22805 Shady Ln	35.15130536	-118.51062	46068108	3
21530 Shirley Dr	35.1308859	-118.47964	134986E	3
23080 Woodford	35.1544348	-118.49384	1373131E	3
22800 Woodford	35.15173986	-118.49480	1559481E	3
22800 Woodford	35.15139089	-118.49537	1559484E	3
22601 Fairway Ct	35.14853821	-118.49821	1769361E	3
20508 Country Club Dr	35.14881071	-118.49549	1769366E	3
22561 Woodford	35.14867281	-118.49504	1769367E	3
21701 Sunnybrook Dr	35.14887239	-118.51505	1786652E	3
22301 Coral Ct	35.14322049	-118.51151	1786673E	3
21404 Country Club Dr	35.14357416	-118.51058	1786675E	3
21401 Country Club Dr	35.14368108	-118.51030	1786676E	3
21017 Country Club Dr	35.14560072	-118.50524	1786686E	3

20916 Country Club Dr	35.14573505	-118.50335	1786690E	3
20916 Country Club Dr	35.14562265	-118.50338	1786691E	3

b) Charter’s Statewide Inspection described in their response to PADR Question 4 on Maintenance and Inspection Policies, Procedures and Programs that Charter will complete a Structured Patrol of all underground and aerial plant that is not in an HFTD site, every 20 years. The SPIDA inspection records for 21225 Quail Springs Rd and 19318 Brite Valley Rd in Tehachapi, listed “Start 19 Year Countdown” in the Status 2 column, implying it is not in an HFTD location and they are following the 20-year inspection cycle. However, both sites are in Tier 3 locations, and Charter should conduct a patrol annually and a detailed inspection once every 5-years. Charter should correct this error in the database and ensure inspections and patrols are conducted per HFTD Tier 3 requirements.

4. GO 95, Rule 80.1-A.(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District and GO 95, Rule 80.1-A.(2), Statewide Inspection Requirements, GO 95, Rule 80.1-A.(3) Definitions, Patrol Inspections state in part:

“Each company’s procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.”

“For the purpose of this rule, Patrol Inspection shall be defined as a simple visual inspection, of applicable communications facilities equipment and structures that is designed to identify obvious structural problems and hazards. Patrol inspections may be carried out in the course of other company business.”

ESRB Finding: Charter did not provide ESRB a checklist for patrol inspections in their response to the PADR Question 4 on Maintenance and Inspection Policies, Procedures and Programs. It was also noted during the field audit that a checklist was not used by Charter personnel. Charter must develop a checklist for its patrol inspections that inspectors can use to identify obvious structural problems and hazards in accordance with GO 95, Rule 80.1-A.(1).

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).”

ESRB Finding:

- a) The SPIDA inspection records did not identify the personnel who performed the inspections, which does not comply with GO 95, Rule 80.1.A.(4) Record Keeping.
- b) ESRB also found that when the SPIDA Excel spreadsheet was sorted by “High Fire” and then by “Status2”, there were inconsistencies or errors in the records. For example, at 21305 Country Club Drive and 20632 Ridgecrest Drive, “Status-2” were listed as “Start 4 Year Countdown” implying they are in Tier 3 sites, but “High Fire” were listed as “No”. There were 28 other locations with similar inconsistencies or errors, including 20827 Neely Ave, which is a Tier 3 site, but had a “Start 9 Year Countdown” and “No” for “High Fire”. The inconsistencies/errors are listed in Table 3 below. Charter should resolve these inconsistencies and correct the records.

Table 3: Errors and Inconsistencies in SPIDA Inspection Records

Address	Latitude	Longitude	Status2 CD=Countdown	High Fire
21305 Country Club Dr	35.14322049	-118.51151	Start 4 Yr CD	No
20632 Ridgecrest Dr	35.14655942	-118.49795	Start 4 Yr CD	No
1200 E Tehachapi Blvd	35.12802784	-118.42327	Start 9 Yr CD	No
20827 Neely Ave	35.11324	-118.50064	Start 9 Year CD	No
1200 E Tehachapi Blvd	35.1272913	-118.42324	Start 9 Year CD	No
Barstow-Bakersfield#2 Hwyl	35.116987	-118.38297	Start 9 Year CD	No
913 Golden West Ct	35.12235557	-118.46105	Start 9 Year CD	No
18727 Cherry Ln	35.12060102	-118.46301	Start 9 Year CD	No
14812 Jameson Rd 1	35.1169739	-118.39318	Start 9 Year CD	No
15054 Abajo Ave	35.1169758	-118.39724	Start 9 Year CD	No
15115 Abajo Ave 3	35.1170123	-118.39822	Start 9 Year CD	No
15115 Abajo Ave	35.1170285	-118.39909	Start 9 Year CD	No
15154 Abajo Ave 1	35.1170049	-118.39985	Start 9 Year CD	No
14301 Jameson Rd1	35.1170123	-118.38598	Start 9 Year CD	No
14500 Jameson Rd 1	35.1170123	-118.38598	Start 9 Year CD	No
14301 Jameson Rd 5	35.1163626	-118.38339	Start 9 Year CD	No
421 Dennison Rd	35.1379685	-118.43198	Start 9 Year CD	No
700 Bailey Ave	35.12583137	-118.42323	Start 9 Year CD	No
518 Jacobsen Ct	35.1244567	-118.44111	Start 9 Year CD	No
20916 Steuber Rd 3	35.1243045	-118.41414	Start 9 Year CD	No
20916 Steuber Rd 2	35.12419701	-118.41425	Start 9 Year CD	No
49500 Alan Ave	35.13437669	-118.43203	Start 9 Year CD	No
15328 Abajo Ave	35.117023	-118.40242	Start 9 Year CD	No
20137 Jameson Rd	35.1140059	-118.37913	Start 9 Year CD	No

20607 Steuber Rd 2	35.12176954	-118.41430	Start 9 Year CD	No
28265 Griffin St	35.126784	-118.46171	Start 9 Year CD	No
429 E F St	35.10366434	-118.44144	Start 9 Year CD	No
20607 Steuber Rd	35.12425624	-118.41747	Start 9 Year CD	No
E Valley Blvd	35.12430121	-118.41935	Start 9 Year CD	No
700 Bailey Ave	35.1243322	-118.42627	Start 9 Year CD	No

- c) The SPIDA inspection records for many Third-Party Notifications as shown in Table 4, had Latitude and Longitude data that do not correspond to the Tehachapi area. Also, in preparing for the field audit, ESRB found one record for Curry St north of Welch Ct, that had incorrect Latitude and Longitude data (mapping software put the location several miles southeast of Tehachapi at a remote desert site). These errors should be corrected or removed.

Table 4: Incorrect Latitude and Longitude Data

Address	Latitude	Longitude
21400 Belmont Drive	5.06631685	-5.5770180
Piedra Drive & Verde St	0.15780718	-5.515492
Mesa Drive & Boogie St	9.43018396	-8.6321758
Woodford Tehachapi Rd & Dawn	1.68107866	-4.2053772
Es Angel St & Golden Hills	7.00167077	-1.4141429
Cross Way & Angel St	9.19526939	-7.6677728
Golden Hills & Woodford Tehachapi Rd	6.9962513	-6.6457949
San Gabriel & Sun Court	8.3444533	-6.2566759
Copper Drive & Gold St	5.2280827	-7.9008505
Moon Drive & Pat Court	2.18687489	-4.6336007
Pat Court & Moon Drive	5.98714508	-2.7943766
5'N & 2409' W/O /SE COR SEC 21-32-33	8.1736998	-6.7466351
Curry St NO Welch Ct	35.075495	-118.26522

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Site #	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
1	• Pole #120254002	35.35803, -119.0404	Oakdale Dr & Bank St	Bakersfield
2	• Pole	35.35132, -119.0326	317 Dixon Ave	Bakersfield
3	• Pole	35.35041, -119.0526	501 McDonald Way	Bakersfield
4	• Pole	35.3506, -119.05253	413 McDonald Way	Bakersfield
5	• Pedestal	35.35026, -119.0587	500 Taylor St	Bakersfield
6	• UG Pedestal	35.142399, -118.451	901 Capital Hills Park	Tehachapi
7	• UG Vault	35.139785, -118.451	Mill St & Highway 58	Tehachapi
8	• Pole	35.12431, -118.4479	802 Green St	Tehachapi
9	• Pole#1183974E	35.1227983, -118.45	S Curry St & Welch Ct	Tehachapi
10	• Pole#1021994E	35.1227983, -118.45	S Curry St & Welch Ct	Tehachapi
11	• Pedestal	35.118315, -118.451	1120 S Curry St	Tehachapi
12	• Pole#2322860E	35.15139, -118.4781	22811 Camp Dr	Tehachapi
13	• Pole#2338998E	35.15139, -118.4781	22811 Camp Dr	Tehachapi
14	• Pole#2338751E	35.15139, -118.4781	22811 Camp Dr	Tehachapi
15	• Pole#4180108E	35.14431, -118.4896	20104 Clubview Dr	Tehachapi
16	• Pole#2322208E	35.14431, -118.4896	20104 Clubview Dr	Tehachapi
17	• Pole	35.13545, -118.4944	21706 Mid Way	Tehachapi
18	• Pole	35.13443, -118.4911	20209 Mini Court	Tehachapi
19	• Pedestal	35.13443, -118.4911	20209 Mini Court	Tehachapi
20	• Pedestal	35.13443, -118.4911	20209 Mini Court	Tehachapi
21	• Pole	35.20752, -118.8369	249 Monroe St	Arvin
22	• UG Vault	35.20075, -118.8362	736 Monroe St	Arvin
23	• Pole	35.19917, -118.8379	843 Walnut St	Arvin
24	• Pole#12085479 2	35.19723, -118.8331	Olsen St & Meyer St	Arvin
25	• Pole#11019936 9	35.19723, -118.8331	Olsen St & Meyer St	Arvin
26	• Pole	35.19451, -118.8391	1300 Block Sycamore Rd	Arvin
27	• Pedestal	35.25672, -118.9191	10716 San Diego St	Lamont
28	• Pedestal	35.25716, -118.9195	10713 San Gorgonio St	Lamont
29	• Pedestal	35.25772, -118.9200	7513 San Emidio Ct	Lamont
30	• Pole#12106022 7	35.14085, -119.4459	400 E Kern St	Taft
31	• Pole#12101245 8	35.14085, -119.4459	400 E Kern St	Taft

Site #	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
32	• Pedestal	35.14668, -119.4536	306 Calvin St	Taft
33	• Pedestal	35.14668, -119.4536	306 Calvin St	Taft
34	• Pole	35.14627, -119.4523	900 3rd St	Taft
35	• Pole	35.13485, -119.4688	333 Phillipine St	Taft
36	• Pedestal	35.1434, -119.46982	416 Sierra St	Taft
37	• Pedestal	35.1434, -119.46982	414 Sierra St	Taft
38	• Pole	35.1601, -119.46044	611 Taylor St	Taft
39	• Pedestal	35.2985, -119.13916	6209 Painted Daisy Ct	Bakersfield
40	• Pedestal	35.2985, -119.13916	6209 Painted Daisy Ct	Bakersfield
41	• Pedestal	35.2985, -119.13916	6209 Painted Daisy Ct	Bakersfield
42	• Pedestal	35.30048, -119.1390	6002 Herzon Court	Bakersfield
43	• Pedestal	35.30048, -119.1390	6002 Herzon Court	Bakersfield
44	• Pedestal	35.30048, -119.1390	6002 Herzon Court	Bakersfield
45	• Pedestal	35.30049, -119.1111	9802 Buckhorn Peak Dr	Bakersfield
46	• Pedestal	35.30049, -119.1111	9802 Buckhorn Peak Dr	Bakersfield
47	• Pedestal	35.30049, -119.1111	9802 Buckhorn Peak Dr	Bakersfield
48	• Power Supply	35.28151, -119.0922	GosfordRd/8001HarrisRd	Bakersfield
49	• Pedestal	35.2953, -119.08126	7201 Landing Cove St	Bakersfield
50	• Pedestal	35.2953, -119.08126	7201 Landing Cove St	Bakersfield
51	• Pedestal	35.29767, -119.082	7102 Firebaugh St	Bakersfield
52	• Pedestal	35.29767, -119.082	7110 Firebaugh St	Bakersfield
53	• Pedestal	35.29639, -119.076	6623 Silver Moon Drive	Bakersfield
54	• Pedestal	35.29639, -119.076	6615 Silver Moon Drive	Bakersfield
55	• Pedestal	35.2989, -119.05536	4712 Pinecastle Ave	Bakersfield
56	• Pedestal	35.2989, -119.05536	4804 Pinecastle Ave	Bakersfield
57	• Pedestal	35.32228, -119.0607	3517 Grissom St	Bakersfield
58	• Pedestal	35.32228, -119.0607	3517 Grissom St	Bakersfield
59	• Pedestal	35.32488, -119.0647	5405 Planz Road	Bakersfield
60	• Pedestal	35.32488, -119.0647	5401 Planz Road	Bakersfield
61	• Pole#12208150 4	35.33325, -119.0546	4525 Meadowlark Way	Bakersfield
62	• Pole#12208152 2	35.33325, -119.0546	Stine Rd near Wilson Rd	Bakersfield
63	• Pole#JPA19278	35.4962, -119.28276	205 W. Ash Ave (alley)	Shafter
64	• Pole#JPA19273	35.4962, -119.28276	205 W. Ash Ave (alley)	Shafter
65	• Pole#JPA19275	35.4962, -119.28276	205 W. Ash Ave (alley)	Shafter
66	• Pole#12133626 4	35.499, -119.274595	250 East Marengo Ave	Shafter
67	• Pole	35.50232, -119.2576	1160 Weyand Ave	Shafter

Site #	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
68	• Pole	35.478497, -119.269	30594 Orange Ave	Shafter
69	• UG Vault	35.44835, -119.1083	9622 Silver Falls Lane	Bakersfield
70	• Pedestal	35.44835, -119.1083	9606 Silver Falls Lane	Bakersfield
71	• UG Vault	35.44835, -119.1083	9614 Silver Falls Lane	Bakersfield
72	• Pedestal	35.44471, -119.1181	4001GossamerGroveBlvd	Shafter
73	• Pedestal	35.44498, -119.119	3829EvergreenVillage Ln	Bakersfield
74	• Pedestal	35.40639, -119.148	13100 Boyd Lake Drive	Bakersfield
75	• Pedestal	35.40639, -119.148	13101 Boyd Lake Drive	Bakersfield
76	• Pedestal	35.413696, -119.120	5904 Cougar Falls Court	Bakersfield
77	• UG Vault	35.413696, -119.120	5901 Cougar Falls Court	Bakersfield
78	• Pedestal	35.413696, -119.120	5908 Cougar Falls Court	Bakersfield
79	• UG Vault	35.3848, -119.12768	11217Aimee Way	Bakersfield
80	• UG Vault	35.3848, -119.12768	11217Aimee Way	Bakersfield
81	• UG Vault	35.38937, -119.1055	9302 Alki Court	Bakersfield
82	• UG Vault	35.38937, -119.1055	9215 Alki Court	Bakersfield
83	• Pedestal	35.38937, -119.1055	9205 Alki Court	Bakersfield
84	• Pedestal	35.38937, -119.1055	9201 Alki Court	Bakersfield
85	• UG Vault	35.39108, -119.1024	9000 Seahurst Court	Bakersfield
86	• Pedestal	35.39108, -119.1024	9012 Seahurst Court	Bakersfield
87	• Pedestal	35.39108, -119.1024	9008 Seahurst Court	Bakersfield
88	• Pedestal	35.39798, -119.1101	CallowayDr&HagemanCt	Bakersfield
89	• Pedestal	35.39798, -119.1101	CallowayDr&HagemanCt	Bakersfield
90	• UG Vault	35.4077, -119.09164	8016 Peanut Ave	Bakersfield
91	• Pedestal	35.407658, -119.091	5301 Sedwick St	Bakersfield
92	• Pole#12037071 3	35.40469, -119.0349	707 Bearsley Ave	Bakersfield
93	• Pole	35.40489, -119.0352	707 Bearsley Ave	Bakersfield
94	• Pole#12221882 5	35.41257, -119.0263	314 Warren Ave	Bakersfield
95	• Pole	35.40496, -119.0357	BeardsleyAve/Harris Dr	Bakersfield
96	• Pole #93971	35.4080, -119.02526	224 Plymouth Ave	Bakersfield
97	• Pole #13997	35.4080, -119.02526	224 Plymouth Ave	Bakersfield
98	• Pole	35.4080, -119.02526	224 Plymouth Ave	Bakersfield
99	• Pole#12042831 8	35.364697, -118.976	1805 Potomac Ave	Bakersfield
100	• Pole#12042831 7	35.364697, -118.976	1805 Potomac Ave	Bakersfield
101	• Pole#12042832 1	35.364697, -118.976	1805 Potomac Ave	Bakersfield

Site #	Equipment Type(s)	Approximate Latitude / Longitude	Approximate Address	City
102	• UG Vault	35.60403, -119.348	316 Mesquite Court	Wasco
103	• UG Vault	35.60403, -119.348	316 Mesquite Court	Wasco
104	• Pedestal	35.6046, -119.33798	1016 Iris St	Wasco
105	• Pedestal	35.6046, -119.33798	1109 Iris St	Wasco
106	• Pole (ATT)	35.5995, -119.33537	301 E Street	Wasco
107	• JointPole#1686 1	35.5995, -119.33537	301 E Street (alley)	Wasco
108	• JointPole#1686 0	35.5995, -119.33537	301 E Street (alley)	Wasco
109	• Pole#12011803 2	35.59856, -119.3335	332 F Street	Wasco
110	• Pole	35.59856, -119.3335	332 F Street	Wasco
111	• Pole	35.59856, -119.3335	332 F Street	Wasco
112	• Pole#12148488 568	35.59591, -119.3372	1026 6th Street	Wasco

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1.GO 95, Rule 31.1, Design, Construction and Maintenance states in part:

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

ESRB’s findings related to above Rule are listed in Table 5

Table 5: GO 95, Rule 31.1 Findings

Site #	Findings
1	The lashing to Charter’s cable is coming loose.
2	A guard arm brace has come loose from the pole and needs to be reattached. The insulator bobs on Charter’s guy wire is less than 6 feet from the pole.
4	Riser guard is clamped about every 5 feet instead of every 3 feet.
12	Drip loop is not attached to strand.

Site #	Findings
13	Charter coaxial cable is loose and should be attached to spacer bar on pole.
21	Charter has a loose dangling cable messenger at the pole.
21	Charter has multiple service drops supported by an ATT cable. Charter needs to re-attached their service drops to a Charter strand/cable.
25	Charter cable storage near pole is obstructing access and needs to be rearranged.
34	Charter riser guard needs clamp.
38	Charter cable storage neat pole is obstructing access and needs to be rearranged.
63	Charter service drop is being hung from an ATT cable.
66	Charter service drop cable to home at 256A E Marengo Ave is under strain by tree branches.
67	Charter needs to reattach guard arm which is loose.
93	Charter service drop is being hung from ATT cable.

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 above Rule are listed in Table 6:

Table 6: GO 95, Rule 31.6 Findings

Site #	Finding
4	Charter has an abandoned service drop.
97	Charter has two abandoned service drops.
110	Charter has an abandoned service drop.
111	Charter has an abandoned service drop.

3.GO 95, Rule 38, Minimum Clearance of Wires from Other Wires states in part:

“The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.

Table 2, Case 3C: The clearance between wires, cables and conductors not supported on the same poles, vertically at crossings in spans and radially where colinear or approaching crossings for communication conductors (including open wire, cables and service drops) must be at least 24 inches.

Table 2, Case 8C: Vertical separation between conductors and/or cables, on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole and in adjoining midspans for communication conductors (including open wire, cables and service drops) must be at least 12 inches.

EXCEPTION: Can be less than 12” for strand mounted terminals, splice cases and other equipment located 8” or more from the centerline of the pole, but not less than 1” with mutual agreement between affected owners.”

ESRB’s findings related to above Rule are listed in Table 7:

Table 7: GO 95, Rule 38 Findings

Site #	Finding
34	Charter cable does not have adequate separation at midspan from Frontier cable.
35	Charter cable is contacting Frontier’s equipment (weaver clamp).
63	Charter cable is contacting ATT cable and does not have adequate midspan clearance from ATT cable.
66	Charter splitter box is contacting ATT splice box.
67	Charter cable does not have adequate midspan clearance from ATT cable.
95	Charter cable contacting ATT snowshoe.
108	Charter cable contacting ATT cable.
109	Charter upper cable contacting ATT cable.

4.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 above Rule are listed in Table 8:

Table 8: GO 95, Rule 84.4-A(6) Findings

Site #	Findings
10	The Charter span is only 16 feet 7 inches above ground at the center of the road.
17	The Charter cable span is only 17 feet 8 ½ inches above ground at the center of the road.
24	The Charter cable span is only 17 feet 4 ½ inches above ground at the center of the road.
30	Charter has two service drops at the center of the alley road that are only 17 feet 9 inches and 17 feet 1 inch.
35	Charter service drop has low clearance (16 feet) at center of alley road.
38	Charter cable has low midspan clearance (12 feet 11 inches) at center of alley road.
61	Charter cable has low clearance (14 feet 11 inches) at curb in alley road.
62	Charter cable has low clearance (14 feet 8 inches) at curb of road.
68	Charter cable has low clearance (14 feet 10 inches) at curb in agricultural area.
95	Charter cable has low clearance (15 feet 8 ½ inches at road centerline.
96	Charter cable has low clearance at -two service drops, one is (17 feet 10 inches) and other is (17 feet 7 ½ inches), at road centerline.
107	Charter cable has low clearance (15 feet 6 inches) at center of alley road.
108	Charter cable has low clearance (14 feet 4 inches) at curb in alley road.
110	Charter cable has low midspan clearance (15 feet 7 ½ inches) at curb in alley road.

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 above Rule are listed in Table 9:

Table 9: GO 95, Rule 84.6-B Finding

Site#	Finding
23	Charter ground molding is damaged and needs to be replaced.
68	Charter has damaged ground moulding.
93	Charter has damaged ground.
101	Charter has exposed ground moulding. Charter fixed in field.
110	Charter has an abandoned ground line.

6.GO 95, Rule 84.7A – Climbing Space states:

“Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c , 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

The climbing space shall be maintained in the same position on the pole for minimum vertical distance of 4 feet above and below each conductor level through which it passes, excepting that where a cable is attached to a crossarm or a pole with the cable less than 9 or 15 inches from the center line of the pole supporting conductors on line arms (no buck arm construction involved) in accordance with the provisions of Rules 84.4–D1 or 87.4–C3 , the 4 foot vertical distance may be reduced to not less than 3 feet.

The position of the climbing space shall not be shifted more than 90 degrees around the pole within a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.

The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–E. ”

ESRB’s findings related to above Rule are listed in Table 10:

Table 10: GO 95, Rule 84.7A Findings

Site #	Finding
4	Vegetation is impeding climbing space.
10	Equipment (strand) and vegetation is impeding climbing space.
107	Vegetation is impeding climbing space.

7.GO 95, Rule 84.8-C(2)(b), Service Drops, Clearances above Ground and Buildings, Above Private Thoroughfares or Private property states:

“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 above Rule are listed in Table 11:

Table 11: GO 95, Rule 84.8-C(2)(b) Finding

Site #	Finding
18	There are 4 Charter low service drops (10 feet 10 inches, 11 feet, 11 feet 3 inches, 11 feet 9 inches) above the customer’s driveway.
66	Charter has low service drop (~ 8 feet) at 246 E Marengo Ave.

8.GO 95, Rule 86.2, 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 finding related to above Rule is listed in Table 12:

Table 12: GO 95, Rule 86.2 Findings

Site #	Findings
61	The down guy is loose.

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

“Cables or messengers where attached to the surface of poles which support supply conductors, shall not be less than 6 feet vertically below the level of supply conductors.

EXCEPTION: This minimum clearance of 6 feet may be reduced to not less than 4 feet below supply conductors of 0 - 750 volts provided a guard arm is placed above the messenger and cable (or self-supporting cable) in accordance with the provision of Rule 87.7-B (see Rule 21.0-D for guard arm definition). No cable or messenger shall be attached to the surface of such a pole less than 2 feet below the lowest level of communication conductors on crossarms unless a minimum horizontal separation of 30 inches is maintained between the messenger or cable and the communication conductors on the opposite side of pole.”

ESRB’s findings related to above Rule are listed in Table 13:

Table 13: GO 95, Rule 87.4-C(3) Finding

Site #	Finding
21	The Charter span does not have 6 feet separation from the secondary conductors.
30	The Charter span installed below the guard arm and is only 3 feet 7 inches from the PGE secondary supply line and does not meet 4 feet.
34	The Charter span does not have 6 feet separation from the supply conductors.

10.GO 95, Rule 87.7-D(1), Risers states:

*“Covered from Ground Level to 8 Feet above the Ground:
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 above Rule are listed in Table 14:

Table 14: GO 95, Rule 87.7-D(1) Findings

Site #	Findings
16	The riser guard is less than 8 feet high.
25	Charter needs a riser guard for an unprotected Underground cable at the pole.

11.GO 95, Rule 91.3-C, Stepping states:

“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 steps.”

ESRB’s findings related to above Rule are listed in Table 15:

Table 15: GO 95, Rule 91.3-C Finding

Site #	Finding
62	The lowest pole step is only 7 feet from the ground line.
108	The lowest pole step is only 7 feet from the ground line.
110	The lowest pole step is only 7 feet 10 inches from the ground line.
111	The lowest pole step is only 6 feet 6 inches from the ground line.

12.GO 95, Rule 92.4-D(1) , Location of Grounds on Exposed Cables with Metallic Shields, Sheaths, or Messengers; and on Exposed Guys states:

Exposed Cables and Messengers: The exposed communication cables and messengers shall be grounded: At all deadend poles and at intervals not greater than every one-quarter of a mile (1320 feet).

ESRB’s finding related to above Rule is listed in Table 16:

Table 16: GO 95, 92.4-D(1) Finding

Site #	Finding
14	Charter cable dead ends at pole and needs to be grounded.

13.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 above Rule are listed in Table 17:

Table 17: GO 128, Rule 17.1 Findings

Site #	Findings
28	Ground wire was not attached to ground rod. Charter fixed in field.
33	Ground wire to the amplifier was not attached.
40	Pedestal was damaged and needs to be replaced.
47	Pedestal has amplifier but is missing ground rod.
57	Pedestal has amplifier but is missing ground rod.
70	Pedestal was damaged and is missing ground rod.
75	Ground wire not attached to ground rod.
79	Ground wire not attached to ground rod. Charter fixed in field.
83	Pedestal was damaged and needs to be replaced.
84	Pedestal was damaged and needs to be replaced.
85	UG Vault is at end of line and needs ground rod.
86	Damaged pedestal.
87	Damaged pedestal.
90	Ground wire not connected to ground rod. Charter fixed in field.
91	Damaged pedestal frame.

14.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 above Rule are listed in Table 18:

Table 18: GO 128, Rule 17.8 Findings

Site #	Findings
5, 11, 19, 20, 27, 28, 29, 32, 36, 41, 42, 43, 44, 46, 47, 48, 51, 52, 54, 56, 57, 58, 59, 70, 72, 73, 74, 78, 79, 86, 87, 88, 89, 104, 105	The surface-mounted Pedestal is not marked with any ownership identification.
22, 69, 71, 80, 82, 103	The underground vault is not marked with any ownership identification.

15.GO 128, Rule 42.7, Covers states:

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

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

Table 19: GO 128, Rule 42.7 Findings

Location #	Findings
6, 36, 37, 40, 41, 42, 44, 46, 47, 56, 57, 58, 59, 70, 74, 76, 77, 78, 91, 103, 104	The surface-mounted Pedestal was unsecured as found. Charter fixed locations 44, 58, 104 in field.

V. Observations

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

- (2) *“Where a communications company’s or an electric utility’s (Company A’s) actions result in potential violations of GO 95 for another entity (Company B), that entity’s (Company B’s) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.*
- (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 GO95.”*

Table 20 includes all non-Charter (third-party) findings that ESRB observed during the audit:

Table 20: Observations

Site #	Observations
1	ATT needs to transfer it’s cables to the new PGE pole. ATT also has low cable drop at the road centerline (17 feet 7 ½ inch).
2	PGE pole has split at the top. PGE insulator bob on guy wire is less than 6 feet from the pole.
2	ATT cable is under strain between 315 and 317 Dixon Ave.
10	Race Communications splice box is contacting Charter cable.
12	Race Communications needs to raise/reattach their cable to meet 12 inch separation from Charter cable.

Site #	Observations
16	Race Communications needs to raise splice box to meet separation from Charter extender box, and needs to install a riser guard for their underground cable.
17	Race Communications has an abandoned drop.
21	PGE service drop has a damaged neutral wire. This was reported immediately to the PGE 24 hour Notification Center. PGE also has down guy contacting ATT cable.
21	ATT has an abandoned service drop.
24	PGE has loose down guy.
24	ATT cable has low clearance (13 feet 10 inches) at road centerline, and low midspan clearance (13 feet 10 inches) to adjacent pole at site 25.
31	Frontier has abandoned service drop.
34	PGE metal riser guard is not grounded.
34	Frontier metal riser guard is not grounded, and Frontier has low cable clearance at curb (14 feet 2 inches).
35	Frontier has low service drop clearance (17 feet 3 inches) at alley centerline and has dangling cable near splice box.
35	PGE has low service drop clearance (17 feet 3 inches) at alley centerline.
38	Frontier has low service drop clearance (17 feet 9 inches) road centerline and has an exposed junction box near pole.
61	ATT has damaged pedestal, damaged riser and is not clamped to the pole, abandoned service drop.
61	PGE needs to remove old pole which has been replaced with new pole, new pole has rot at the upper section of pole and surface rot and a long crack/check in lower section of pole.
62	ATT cable has low clearance (12 feet 10 inches) at road curb.
63	ATT has damaged ground moulding.
64	ATT has exposed cable at a junction box.
65	ATT has an abandoned service drop.
66	ATT has loose ground moulding at pole, abandoned service drops on alley arm, service drop cable is under strain on tree branch near home, service drop cable is contacting PGE service drop, low service drop at 246 E Marengo Ave.
66	PGE has a bird nest on transformer support bracket.
67	ATT needs to repair damaged ground moulding.

Site #	Observations
91	PGE needs install High Visibility Strip.
92	ATT damaged/exposed riser, exposed junction box, adjacent ATT span also has exposed junction box.
94	ATT low clearance at curb (15 feet 8 ½ inches), multiple service drops with strain on tree.
95	PGE low service drop at curb (14 feet 5 inches) to home at 100 Harris Drive.
98	PGE pole is leaning about 10 degrees, pole is dead end pole and there is no down guy.
99	PGE down guy contacting Charter and ATT service drops.
101	PGE damaged High Visibility Strips.
106	ATT needs High Visibility Strips, loose lashing, cable strain on tree branch, abandoned drop next to pole.
107	ATT ground molding exposed, low service drop clearance (14 feet 3 inches) at center of alley road.
108	ATT junction box is exposed and has an abandoned service drop.
108	PGE has low service drop (15 feet 3 ½ inches) at alley curb.
109	ATT service drop is attached to Charter strand.
110	ATT has several cables with low midspan clearance at alley curb (13 feet and 15 feet).