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

February 7, 2025 CA2024-1299

Jane Whang
Government Affairs
Verizon Communications Inc.
375 West Trimble Road
San Jose, CA 95131

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Verizon Fresno Group Service Area

Ms. Whang:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Thomas Roberts, Brandon Vazquez, and Rafael Herranz of ESRB staff conducted a CIP audit of Verizon's Fresno Group Service Areas from December 9 to 13, 2024. During the audit, ESRB staff conducted field inspections of Verizon'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 are enclosed.

Please provide a response no later than March 7, 2025, via electronic copy, of all corrective actions and preventive measures taken by Verizon to correct the identified 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 Thomas Roberts at (415) 971-3907 or thomas.roberts@cpuc.ca.gov.

Sincerely,

Rickey Tse, P.E.
Program and Project Supervisor

Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC Audit Findings of Verizon's Fresno Group Service Areas

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Thomas Roberts, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC
Rafael Herranz, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC

CPUC AUDIT FINDINGS OF
VERIZON FRESNO GROUP SERVICE AREAS
DECEMBER 9-13, 2024

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records obtained through Verizon's response to ESRB's data requests:

- Statistics for the facilities subject to GO 95 and GO 128,[1]
- Service maps for Verizon equipment in Fresno, Kings, Tulare, and Merced Counties, including Graphical Information System (GIS) data,
- GO 95 and GO 128 inspection program documents,[2]
- Inspector training documents,
- A list of GO 95 and GO 128 inspection records,
- A list of pole loading calculations completed from October 2019 through October 2024,
- A list of new construction projects completed from October 2019 through October 2024.

II. Records Violations

ESRB found violations of multiple GO 95 and GO 128 rules based on its review of documents provided during the audit. Each of the following sections provides excerpts of the applicable rule(s) followed by an explanation of the violations.

1. **GO 95, Rule 18-A(2), Maintenance Programs** states in part:
   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.

While one of Verizon's program documents references this rule, another document provided procedures for third party notices <u>received</u>, but not for third party notices <u>issued</u>. Verizon stated that it neither issued nor received any third party notifications from October 2019 through October 2024. Table 9 in Section V below shows that ESRB staff observed approximately 72 third party violations during the field audit of 111 poles. These observations confirm that Verizon does not have procedures to notify third parties of issues on shared poles, and that Verizon is in violation of this rule.

[1] Data on the number of customers was not provided due to objections by Verizon.
[2] Documentation of maintenance programs was not provided, except for inspections, per Section III.6 below.

2. **GO 95, Rule 18-B, Maintenance Programs** states in part:
   Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions.

ESRB requested information on Verizon's inspector training program, and the qualifications of inspectors to perform inspections in compliance with GO 95. Verizon provided one document which provided a checklist for the training courses inspectors should have, but not the instructional materials referenced therein. The document provided is also only a blank template, and completed checklists for the inspectors active during the audit period were not provided. Finally, none of the documents establish how the provided checklist relates to Verizon's inspection program. For example, there are no program documents which specify that patrol and detailed inspections can only be performed by inspectors that successfully complete all the training listed on the checklist, or if any recurring training is required. Based on these findings, Verizon is in violation of this requirement to document inspector qualifications.

3. **GO 95, Rule 18-B, Maintenance Programs** states in part:
   Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules.

   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.

This section of Rule 18-B includes two interrelated requirements: 1) the company must have an *auditable* maintenance program, and 2) it defines the minimum requirements for such a program to be deemed *auditable*. ESRB requested Verizon's documentation for its maintenance and inspection (M&I) policies, procedures, and programs, as well as records of Verizon's inspections and maintenance work orders. ESRB's review of this information revealed the following:

- Verizon's program documents do not refer to GO 95 Rule 18-B or define the minimum required data to be collected,
- Verizon's program documents and inspection records do not include a timeline for corrective actions,[3]
- Verizon did not provide maintenance work order records which document that corrective actions were performed.

Based on these findings, Verizon is in violation of the minimum requirements for an auditable maintenance program per Rule 18-B.

[3] Refer to Section 3 below.

4. **GO 95, Rule 18-B(1), Maintenance Programs** states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.

Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate:

- *Type of facility or equipment;*
- *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
- *Accessibility;*
- *Climate;*
- *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*

(a) The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:

- *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*

(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:

- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:

- *Take corrective action within 60 months […]*

Documentation provided by Verizon regarding M&I policies, procedures, and programs did not reference this rule, the priority levels and corresponding timeline for corrective actions, or the factors to be used to schedule corrective actions within each priority level. Verizon's inspection records include a field titled "Priority," but records indicate "2a" or "2b" without defining the letter subscripts, which are not used within this rule. And as discussed in the previous section, Verizon's documentation does not provide due dates or records of work orders used to perform corrective actions. Finally, Verizon provided inspection records for a single pole, which was inspected on Nov. 15, 2022 and again on July 16, 2024. Two issues from the 2022 inspection remained in 2024, approximately 18 months later. Corrective actions would be late unless they

were deemed Level 3 or Level 2 (4) priority per section "a" of Rule 18-B(1), and this is not specified. For these reasons, Verizon is in violation of the requirements for the timing of corrective actions.[4]

5. Inspection of Overhead Facilities

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.*[5]

GO 95, Rule 80.1.A(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District states in part:

> *Inspections in the High Fire-Threat District shall be planned and conducted in accordance with the statewide inspection requirements and procedures described in Rule 80.1-A(2), below.*
>
> *Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.*

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

> *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'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's review of M&I program documents for Verizon and its subcontractor revealed the following regarding inspections:

[4] This is also a minimum requirement for having an auditable M&I program per Section 2 above.
[5] This rule refers to Rule 80.1 for additional details regarding communications lines.

- The methodology used to ensure that all communication lines are subject to the required inspections is not provided,
- The frequency of patrol and detailed inspections is not provided,
- The five factors required per Rule 80.1.A(2) are not addressed,
- Only one of the 1,269 poles within the boundary of this audit had a detailed inspection record,
- No records of patrol inspections were provided.

Based on these findings, Verizon is in violation with the above GO 95 inspection requirements.

6. Maintenance of Overhead Facilities

GO 95, Rule 18-A(1), Resolution of Potential Violations of General Order 95 and Safety Hazards states:

> *Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.*
>
> *Upon completion of the corrective action, the company's records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.*

GO 95, Rule 18-B, Maintenance 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.*

GO 95, Rule 22.2, Maintenance states in part:

> *Maintenance means the work done on any line or any element of any line for the purpose of extending its life […]*

Sections 1-5 above focus on one component of a company's M&I program: inspections. The rule excerpts in this section address the other component: the maintenance activities and corrective actions triggered by inspections. Program documentation provided by Verizon does not address the maintenance of overhead equipment, and Verizon provided no work orders for maintenance performed as corrective actions. Therefore, Verizon violates the requirement for a maintenance program per the above rules.

7. GO 95, Rule 44.2, Additional Construction states:

> *Any entity planning the addition of facilities shall ensure that the addition of the facilities will not reduce the safety factors below the values specified by Rule 44.3.*
>
> *If performed, the entity responsible for performing loading calculations for additional construction shall maintain these loading calculations for the service life of the pole or*

other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.

Any loading calculations performed for wood structures more than 15 years old shall incorporate the results of intrusive inspections performed within the previous five years.

Verizon provided pole loading calculations for 12 attachment projects in Fresno, each of which includes multiple poles. In response to ESRB's request for intrusive test records, Verizon cited GO 95 Rule 80.1 and stated that it has not conducted any intrusive tests because it is not attached to any communications-only poles in Tier 3 in Fresno County. Since Verizon's M&I program documents do not refer to Rule 44.2 and no intrusive test records have been provided, Verizon is in violation of the requirements of this rule.

8. Maintenance and Inspection of Underground Facilities

GO 128, Rule 12.2, Maintenance states:

Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.

GO 128, Rule 12.3.A, Rules Applicable December 12, 1967 states:

The following rules were made applicable to all systems on December 12, 1967. (1) Rule 12.2.

GO 128, Rule 12.3.B, Rules Applicable April 13, 1970 states in part:

The following rules were made applicable to all systems on April 13, 1970. (1) Rule 17.2.

GO 128, Rule 17, Requirements for All Supply and Communication Systems states:

The following rules apply to all supply and communication underground systems under all conditions.

GO 128, Rule 17.2, Inspection of Lines states:

Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules. (See Rule 12.3).

GO 128, Rule 22.3.B, Maintenance states:

Maintenance means the work done on any facility or element for the purpose of preserving its efficiency or physical condition in service.

The M&I program documentation and records provided by Verizon include no procedures or data for underground equipment, indicating that it does not have an M&I program for underground equipment. ESRB finds that Verizon's lack of a documented M&I program for underground equipment violates the above requirements.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities in Fresno County:[6]

Table 1: Field Inspection Locations[7]

Location #	Structure Type	Approximate Coordinates	City
1	Hand Hole	36.7251313, -119.7774637	Fresno
2	Hand Hole	36.7259748, -119.7778895	Fresno
3	Hand Hole	36.7264939, -119.7783808	Fresno
4	Pole	36.7432847, -119.7449433	Fresno
5	Hand Hole	36.7432847, -119.7449433	Fresno
6	Hand Hole	36.7502122, -119.6834050	Fresno
7	Hand Hole	36.7502122, -119.6834050	Fresno
8	Pole	36.7504964, -119.6854710	Fresno
9	Pole	36.7505681, -119.6993055	Fresno
10	Pole	36.7431821, -119.7330343	Fresno
11	Pole	36.7430937, -119.7324086	Fresno
12	Pole	36.7430932, -119.7318444	Fresno
13	Pole	36.7431095, -119.7336736	Fresno
14	Pole	36.7202809, -119.7457178	Fresno
15	Pole	36.7198635, -119.7457181	Fresno
16	Pole	36.7196179, -119.7457235	Fresno
17	Pole	36.7190022, -119.7457355	Fresno
18	Pole	36.7185778, -119.7457335	Fresno
19	Pole	36.7178987, -119.7457255	Fresno
20	Pole	36.7288192, -119.7365939	Fresno
21	Pole	36.7290705, -119.7365996	Fresno
22	Pole	36.7291567, -119.7368175	Fresno
23	Pole	36.7291487, -119.7371518	Fresno
24	Pole	36.7291473, -119.7377707	Fresno
25	Hand Hole, Pole	36.7056019, -119.7273543	Fresno
26	Pole	36.7050092, -119.7273480	Fresno
27	Pole	36.7045531, -119.7273530	Fresno
28	Pole	36.7042378, -119.7273580	Fresno
29	Hand Hole, Pole	36.7097058, -119.7457667	Fresno

[6] This audit targeted four counties: Fresno, Tulare, Kings, and Merced. All of Verizon's facilities in Tulare, Kings, and Merced counties, and some in Fresno County, were located within the right of way of a railway or the California Aqueduct and Verizon was not able to provide access to these facilities. The field portion of this audit therefore only includes locations in the cities of Fresno and Clovis and adjacent unincorporated areas.

[7] Locations in Fresno include unincorporated areas adjacent to or surrounded by the City of Fresno, e.g. Old Fig Garden.

Location #	Structure Type	Approximate Coordinates	City
30	Pole	36.7093811, -119.7457600	Fresno
31	Pole	36.7089651, -119.7457717	Fresno
32	Pole	36.7086084, -119.7457748	Fresno
33	Pole	36.6792516, -119.7545939	Fresno
34	Pole	36.6799367, -119.7546227	Fresno
35	Pole	36.6808715, -119.7547061	Fresno
36	Pole	36.6814516, -119.7545462	Fresno
37	Hand Hole, Pole	36.6940020, -119.7816547	Fresno
38	Pole	36.6946171, -119.7816446	Fresno
39	Pole	36.6951348, -119.7816319	Fresno
40	Pole	36.6956878, -119.7816272	Fresno
41	Pole	36.6997971, -119.7997170	Fresno
42	Pole	36.7003035, -119.7997264	Fresno
43	Pole	36.7008933, -119.7997656	Fresno
44	Pole	36.7015197, -119.7998210	Fresno
45	Pole	36.7018430, -119.7996496	Fresno
46	Pole	36.7652135, -119.7726870	Fresno
47	Pole	36.7872198, -119.7812577	Fresno
48	Pole	36.7876446, -119.7812476	Fresno
49	Pole	36.7879217, -119.7812436	Fresno
50	Pole	36.7941315, -119.7804561	Fresno
51	Pole	36.7942303, -119.7813090	Fresno
52	Pole	36.7943546, -119.7815460	Fresno
53	Pole	36.8158635, -119.7849310	Fresno
54	Pole	36.8158742, -119.7846876	Fresno
55	Pole	36.8158769, -119.7845753	Fresno
56	Pole	36.8158809, -119.7842658	Fresno
57	Pole	36.8299067, -119.8341690	Fresno
58	Pole	36.8374672, -119.7997093	Fresno
59	Hand Hole	36.8374082, -119.7995722	Fresno
60	Pole	36.8374607, -119.8003886	Fresno
61	Pole	36.8374841, -119.8009196	Fresno
62	Hand Hole, Pole	36.8377468, -119.7807140	Fresno
63	Pole	36.8376810, -119.7802368	Fresno
64	Pole	36.8375799, -119.7793892	Fresno
65	Pole	36.8376220, -119.7790938	Fresno
66	Pole	36.8449158, -119.7836144	Fresno
67	Pole	36.8452375, -119.7835191	Fresno
68	Pole	36.8457871, -119.7836169	Fresno

Location #	Structure Type	Approximate Coordinates	City
69	Hand Hole	36.8733729, -119.7764837	Fresno
70	Hand Hole	36.8739190, -119.7746772	Fresno
71	Pole	36.8517861, -119.7696266	Fresno
72	Hand Hole	36.8517861, -119.7696266	Fresno
73	Pole	36.8512473, -119.7696789	Fresno
74	Hand Hole, Pole	36.8084574, -119.7532823	Fresno
75	Pole	36.8085350, -119.7529290	Fresno
76	Pole	36.8085327, -119.7526399	Fresno
77	Pole	36.7805268, -119.7364514	Fresno
78	Pole	36.7808743, -119.7363817	Fresno
79	Pole	36.7941438, -119.7363988	Fresno
80	Pole	36.7941232, -119.7355513	Fresno
81	Pole	36.7957714, -119.7544098	Fresno
82	Hand Hole, Pole	36.7971511, -119.7543411	Fresno
83	Pole	36.7977412, -119.7544198	Fresno
84	Hand Hole, Pole	36.8025513, -119.7316580	Clovis
85	Pole	36.8028742, -119.7316580	Clovis
86	Pole	36.8031569, -119.7316378	Clovis
87	Pole	36.8035873, -119.7316455	Clovis
88	Hand Hole, Pole	36.8231266, -119.7035437	Clovis
89	Pole	36.8231126, -119.7037559	Clovis
90	Pole	36.8231215, -119.7041160	Clovis
91	Pole	36.8231564, -119.7043081	Clovis
92	Pole	36.8303750, -119.7174600	Clovis
93	Pole	36.8303681, -119.7177980	Clovis
94	Pole	36.8660014, -119.6929627	Clovis
95	Pole	36.8655612, -119.6929453	Clovis
96	Pole	36.8650299, -119.6929456	Clovis
97	Pole	36.8587603, -119.6839411	Clovis
98	Pole	36.8583990, -119.6839341	Clovis
99	Hand Hole, Pole	36.8304451, -119.6852246	Clovis
100	Pole	36.8302242, -119.6856323	Clovis
101	Hand Hole, Pole	36.8266193, -119.6550215	Clovis
102	Pole	36.8258254, -119.6550142	Clovis
103	Pole	36.8252607, -119.6549974	Clovis
104	Hand Hole, Pole	36.7788012, -119.7004266	Fresno
105	Pole	36.7786586, -119.7004173	Fresno
106	Pole	36.7784715, -119.7004166	Fresno
107	Pole	36.7463950, -119.8131415	Fresno

Location #	Structure Type	Approximate Coordinates	City
108	Pole	36.7499116, -119.8654046	Fresno
109	Pole	36.7499202, -119.8643555	Fresno
110	Hand Hole, Pole	36.7647585, -119.8482274	Fresno
111	Pole	36.7647504, -119.8488715	Fresno
112	Pole	36.7647418, -119.8494133	Fresno
113	Pole	36.7647472, -119.8498126	Fresno
114	Pole	36.7647416, -119.8503410	Fresno
115	Pole	36.7647418, -119.8507306	Fresno
116	Hand Hole, Pole	36.7939655, -119.8441900	Fresno
117	Pole	36.7943250, -119.8441927	Fresno
118	Pole	36.7950502, -119.8441867	Fresno
119	Pole	36.7957596, -119.8441615	Fresno
120	Pole	36.7938439, -119.8440700	Fresno
121	Pole	36.7938697, -119.8433280	Fresno

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **GO 128, Rule 17.1, Design, Construction and Maintenance** states in part:
   Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

   For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.

   ESRB's findings related to the above rule are listed in Table 2:

Table 2: GO 128, Rule 17.1 Findings

Location	Findings
69	Tracer not grounded (required per Verizon staff).
72	Tracer not grounded (required per Verizon staff).
116	Exposed tracer wire.

2. **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.

ESRB's findings related to the above rule are listed in Table 3:

Table 3: GO 95, Rule 31.1 Findings

Location	Findings
4	Pole included in GIS map, but Verizon not attached.
7	GIS map shows handhole and pole at this location, but no pole.
8	Pole included in GIS map, but Verizon not attached.
9	Pole included in GIS map, but Verizon not attached.
61	Verizon attached to buddy pole rather than new pole.
94	GIS shows a second pole north of this location at E. Shepherd Ave, but it isn't here.
119	Verizon attached to buddy pole rather than new pole.

3. **GO 95, Rule 35, Vegetation Management s**tates in part:
Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the

structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule.

ESRB's findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 35 Findings

Location	Findings
60	Verizon cable was in contact with a tree and showed signs of abrasion.
94	Vegetation contacting cable resulting in broken lashing.

4. **GO 95, Rule 37, Minimum Clearance of Wires above Railroads, Thoroughfares, Buildings, Etc.** states in part:

   Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.

   Table 1, Case 10B: Radial centerline clearance of conductor or cable (unattached) from non-climbable street lighting or traffic signal poles or standards, including mastarms, brackets and lighting fixtures, and from antennas that are not part of the overhead line system must be at least 1 foot.

   ESRB's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 37 Findings

Location	Findings
44	Verizon cable is approximately 3 inches from streetlight pole.

5. **GO 95, Rule 84.6.B, Ground Wires** states:

   Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such

distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.

Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8).

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

Table 6: GO 95, Rule 84.6.B Findings

Location	Findings
19	Ground wire for Verizon equipment is exposed.
50	Ground wire for Verizon equipment is exposed.

6. **GO 95, Rule 86.2, Guys, Use** states in part:
   Where mechanical loads imposed on poles, towers or structures are greater than can be supported with the safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.

   Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire stress, the pole below the point of guy attachment acting merely as a strut.

   Guys shall be attached to structures as nearly as practicable at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.

   ESRB's findings related to the above rule are listed in Table 7:

Table 7: GO 95, Rule 86.2 Findings

Location	Findings
20	Slack guy wires supporting Verizon equipment.
117	Slack guy wires supporting Verizon equipment.

7. **GO 95, Rule 87.7, Covering or Guarding** states in part:
   A. Vertical and Lateral Cables

See Rules 84.6–C, D and E for covering or protection of vertical and lateral cables cables attached to the surface of poles, crossarms or structures.

D. (1) Risers, 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*

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.

Vertical runs shall be treated as risers (see Rule 87.7–D) where within a distance of 8 feet from the ground line.

ESRB's findings related to the above rules are listed in Table 8:

Table 8: GO 95, Rules 84.6-D and 87.7 Findings

Location	Findings
71	Riser cover does not extend to 8 feet high.
73	Riser cover does not extend to the ground.
99	Loose riser cover.

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 9 includes all non-Verizon (third party) findings that ESRB observed during the audit. Verizon must create outgoing third-party notifications to the respective companies for the following observations:

Table 9: Third Party Observations

Location #	Findings
4	PG&E: high-visibility strips on pole painted over.
10	Comcast: vegetation strain/abrasion on cable.
13	AT&T: missing down guy guard and exposed ground rod.
14	Comcast: loose down guy.
14	AT&T: ground wire cut and section missing; loose down guy.
16	PG&E: loose down guy.
19	Comcast: riser cover not secured.
22	PG&E: broken ground wire cover with exposed wire.
23	Comcast: broken ground wire cover.

Location #	Findings
23	PG&E: damaged/decayed pole.
24	PG&E: damaged/decayed pole (has red tag,)
25	PG&E: fiber contacting Comcast at midspan and vibrating/oscillating even though no wind.
27	PG&E: neutral conductor touching service drop and cross arm.
28	PG&E: broken ground wire cover with exposed wire.
30	PG&E: bare neutral conductor contacting tree.
31	AT&T and Comcast: missing ground wire cover with exposed wire.
37	AT&T: damaged pole.
40	AT&T and Comcast: cables are less than 12 inches from streetlight.
42	AT&T: cable has vegetation strain/abrasion.
42	AT&T and Comcast: cables contacting each other.
44	AT&T and Comcast: cables contacting streetlight.
46	Comcast: Cable touching streetlight.
47	PG&E: damaged high voltage signs.
48	PG&E: damaged high voltage sign.
49	PG&E: missing high voltage sign on top cross arm.
49	Comcast: cable contacting down guy and AT&T cable.
50	PG&E: missing high voltage sign.
52	AT&T: missing down guy guards.
55	PG&E: damaged high voltage sign.
56	PG&E: pole top fire caused significant missing section of wood and high-visibility strips on pole painted over.
57	PG&E: down guy deflected by vegetation.
58	PG&E: pole degraded; missing high voltage sign; insulator pin through bolt backing out/loose.
60	PG&E: missing high voltage sign.
60	AT&T: vegetation causing cable strain/abrasion.
61	AT&T: attached to buddy pole rather than new pole

Location #	Findings
62	Comcast: exposed ground wire.
63	Comcast: riser unsecured and ground wire not covered.
64	Comcast: unsecured and cut riser cover.
68	Comcast: down guy guard missing.
68	AT&T: down guy guard missing.
68	PG&E: bare secondary conductor contacting streetlight.
68	Comcast: cable contacting streetlight.
71	Comcast: idle coax cable.
71	AT&T: riser cover less than 8 feet above grade.
74	AT&T: unsecured ground wire cover and ground wire cut.
74	Comcast: idle cable between poles is contacting AT&T mid-span.
79	Comcast: ground wire not covered above 8 feet and ground molding not secured.
80	PG&E: switch handle rod touching AT&T line.
81	PG&E: cross arm is loose causing jumpers to be taut.
83	AT&T: cut ground wire.
86	AT&T: cut ground wire.
89	PG&E: broken primary insulator.
92	PG&E: span guy touching Comcast cable.
97	PG&E: SCADA control cables from switch touching Verizon cable.
99	AT&T: loose riser cover, exposed ground rod, unsupported splice box.
100	PG&E: service tri-plex and neutral conductor touching.
103	AT&T: uncovered riser cable and low service drop.
108	Comcast: one service drop resting on tree branch and pushed down by tree; another service drop is tied to PG&E service drop for support.
109	PG&E: ground wire and cover damaged.
109	Comcast: service drops tied to PG&E service drop for support.
110	Comcast: cable intermittent contact with PG&E down guy.

Location #	Findings
112	AT&T: idle service drops on ground and cable running through dense vegetation.
114	Comcast: broken lashing wire.
114	PG&E: security cameras attached to pole (wired to adjacent business.)
115	PG&E: horizontal primary insulator damaged: missing top half.
116	PG&E: secondary conductor came off insulator and resting on streetlight with “Marks Ave” sign.
117	PG&E: damaged high-visibility strips.
117	Comcast: cable contacting streetlight and slack down guy.
119	Comcast: attached to buddy pole rather than new pole.
119	PG&E: low rung.
120	AT&T: broken ground wire cover.
121	PG&E: pole degraded, missing high voltage sign, crossarm crooked due to loose or damaged hardware.