

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



September 25, 2014

Esther Northrup  
Regulatory Affairs Director  
Cox Communications  
350 10<sup>th</sup> Avenue, Suite 600  
San Diego, CA 92101

CA2014-004

**SUBJECT:** Audit of Cox Communications – Santa Barbara System

Dear Ms. Northrup:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Koko Tomassian of my staff conducted a Communication Infrastructure Provider (CIP) audit of Cox Communications – Santa Barbara System from April 7, 2014 to April 11, 2014. The audit included a review of Cox's records and field inspections of Cox's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than October 27, 2014, by electronic or hard copy, of all corrective measures taken by Cox to remedy and prevent such violations.

If you have any questions, you can contact Koko Tomassian at (213) 576-7099 or [koko.tomassian@cpuc.ca.gov](mailto:koko.tomassian@cpuc.ca.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Fadi Daye".

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Audit Findings

CC: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC

## AUDIT FINDINGS

The following violations were not documented and/or addressed by COX during its last detailed inspection as required by General Order 95:

<b>1.</b>	<b>Structure No.:</b>	1413772E
	<b>Previous COX Visit Details:</b>	June 6, 2013
	<b>Date of CPUC Inspection:</b>	April 8, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Loose Guy Wire</u></b>		
<p>GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, states in part:</p> <p style="text-align: center;"><i>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.</i></p> <p>The pole had a slack guy wire.</p>		

<b>2.</b>	<b>Structure No.:</b>	4538268E
	<b>Previous COX Visit Details:</b>	June 4, 2013
	<b>Date of CPUC Inspection:</b>	April 8, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
<p>GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.</p> <p>The COX service drop and the service drop of another CIP were touching and thus had less than 12 inches of vertical separation.</p>		

3.	<b>Structure No.:</b>	1523719E
	<b>Previous COX Visit Details:</b>	June 6, 2013
	<b>Date of CPUC Inspection:</b>	April 8, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Climbing Space</u></b>		
GO 95, Rule 84.7, states in part:		
<p style="text-align: center;"><i>... The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7E.</i></p>		
The pole had vegetation growth obstructing the climbing space.		

4.	<b>Structure No.:</b>	4613 Via Rubi (address)
	<b>Previous COX Visit Details:</b>	June 6, 2013
	<b>Date of CPUC Inspection:</b>	April 8, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Broken Vault Lid</u></b>		
GO 128, Rule 17.1, Design, Construction, and Maintenance, states in part:		
<p style="text-align: center;"><i>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 furnishing of safe, proper, and adequate service...</i></p>		
The vault at this address had a lid which was broken and not maintained for its intended use.		

5.	<b>Location:</b>	1524548E
	<b>Previous COX Visit Details:</b>	June 6, 2013
	<b>Date of CPUC Inspection:</b>	April 8, 2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Insufficient Climbing Space</u></b></p> <p>GO 95, Rule 84.7, states in part:</p> <p style="padding-left: 40px;"><i>... The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7E.</i></p> <p>The pole had vegetation growth obstructing the climbing space. This violation was not documented when COX last inspected the pole.</p> <p><b><u>Third Party Safety Hazard – Broken Lashing Wire</u></b></p> <p>GO 95, Rule 18-B, Notification of Safety Hazards, States:</p> <p style="padding-left: 40px;"><i>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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.</i></p> <p>A lashing wire of another CIP was broken. COX did not notify the CIP of this safety hazard when it last visited the pole.</p>		

6.	<b>Structure No.:</b>	1081644E
	<b>Previous COX Visit Details:</b>	December 19, 2013
	<b>Date of CPUC Inspection:</b>	April 8, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Third Party Safety Hazard – Broken Lashing Wire</u></b>		
GO 95, Rule 18-B, Notification of Safety Hazards, States:		
<p><i>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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.</i></p>		
A lashing wire of another CIP was broken. COX did not notify the CIP of this safety hazard.		

7.	<b>Structure No.:</b>	1522804E
	<b>Previous COX Visit Details:</b>	June 6, 2013
	<b>Date of CPUC Inspection:</b>	April 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Bent Pole Step</u></b>		
GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:		
<p><i>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 furnishing of safe, proper, and adequate service...</i></p>		
The pole had a bent pole step which was not usable and thus not maintained for its intended use.		

<b>8.</b>	<b>Structure No.:</b>	S27214Y
	<b>Previous COX Visit Details:</b>	June 6, 2013
	<b>Date of CPUC Inspection:</b>	April 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.		
The vertical clearance between a COX cable and other CIP cable(s) were less than 12 inches.		

<b>9.</b>	<b>Structure No.:</b>	T-7417-A
	<b>Previous COX Visit Details:</b>	June 6, 2013
	<b>Date of CPUC Inspection:</b>	April 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.		
The vertical clearance between a COX cable and other CIP cable(s) were less than 12 inches.		

10.	<b>Structure No.:</b>	4365724E
	<b>Previous COX Visit Details:</b>	June 6, 2013
	<b>Date of CPUC Inspection:</b>	April 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.		
The vertical clearance between a COX cable and other CIP cable(s) were less than 12 inches.		

11.	<b>Structure No.:</b>	4365725E
	<b>Previous COX Visit Details:</b>	June 6, 2013
	<b>Date of CPUC Inspection:</b>	April 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.		
The vertical clearance between a COX cable and other CIP cable(s) were less than 12 inches.		

12.	<b>Structure No.:</b>	S14987Y
	<b>Previous COX Visit Details:</b>	August 1, 2013
	<b>Date of CPUC Inspection:</b>	April 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.		
The vertical clearance between a COX cable and other CIP cable(s) were less than 12 inches.		

13.	<b>Structure No.:</b>	S14990Y
	<b>Previous COX Visit Details:</b>	August 1, 2013
	<b>Date of CPUC Inspection:</b>	April 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.		
The vertical clearance between a COX cable and other CIP cable(s) were less than 12 inches.		

14.	<b>Structure No.:</b>	4592088E
	<b>Previous COX Visit Details:</b>	August 1, 2013
	<b>Date of CPUC Inspection:</b>	April 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.		
The vertical clearance between a COX cable and other CIP cable(s) were less than 12 inches.		

15.	<b>Structure No.:</b>	Vault Location #028
	<b>Previous COX Visit Details:</b>	August 1, 2013
	<b>Date of CPUC Inspection:</b>	April 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Broken Vault Lid</u></b>		
GO 128, Rule 17.1, Design, Construction, and Maintenance, states in part:		
<p style="text-align: center;"><i>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 furnishing of safe, proper, and adequate service...</i></p>		
The vault at this location had a lid which was cracked and not maintained for its intended use.		

16.	<b>Structure No.:</b>	1081644E
	<b>Previous COX Visit Details:</b>	December 19, 2013
	<b>Date of CPUC Inspection:</b>	April 8, 2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Third Party Safety Hazard – Broken Lashing Wire</u></b></p> <p>GO 95, Rule 18-B, Notification of Safety Hazards, States:</p> <p><i>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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.</i></p> <p>A lashing wire of another CIP was broken. COX did not notify the CIP of this safety hazard when it last visited the pole.</p>	

In addition to the above violations, during the course of this audit COX staff notified SED that COX and Verizon share facilities on the poles in this territory and had a mutual agreement, per GO 95 Rule 92.1, which references Table 2, Case 8, Column C (rr), to maintain reduced clearances. However, COX failed to provide evidence of an agreement which was effective during the time of the audit.