

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 12, 2014

Mark Beech  
Plant Manager  
Suddenlink Communications  
201 E. Line Street  
Bishop, CA 93514

CPUCID: CA2014-014

**SUBJECT:** CIP Audit of Suddenlink Communications – Bishop (Suddenlink)

Dear Mr. Beech:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong of my staff conducted an audit of Suddenlink from March 24, 2014 to March 28, 2014. The audit included a review of Suddenlink's records and field inspections of Suddenlink's facilities.

During the audit, we identified violations of General Orders (GO) 95. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than June 13, 2014, by electronic or hard copy, of all corrective measures taken by Suddenlink to remedy and prevent such violations.

If you have any questions, you can contact Derek Fong at (213) 576-6850 or [derek.fong@cpuc.ca.gov](mailto:derek.fong@cpuc.ca.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Raymond Fugere", with a long horizontal flourish extending to the right.

Raymond Fugere, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Audit Summary

Cc: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC  
Fadi Daye, P.E., Senior Utilities Engineer Supervisor, CPUC – LA

## AUDIT SUMMARY

<b>1.</b>	<b>Location:</b>	Suddenlink service territory
	<b>Date of CPUC Inspection:</b>	3/24/2014
<b>Explanation of Violation(s):</b>		
<b><u>Incomplete Patrols</u></b>		
<p>GO 95, Rule 80.1-A2: Statewide Inspection Requirements, States in part:</p> <p style="padding-left: 40px;"><i>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 on the following factors: a) fire threat, b) proximity to overhead power line facilities, c) terrain, d) accessibility, e) location."</i></p> <p>Suddenlink did not have records showing that it patrolled or inspected its facilities. Suddenlink indicated that it patrols its facilities in the course of other work. However, as Suddenlink does not record these patrols, Suddenlink is unable to verify that it patrolled its facilities.</p>		
<b><u>Missing Procedures</u></b>		
<p>GO 95, Rule 80.1-A2: Statewide Inspection Requirements, States in part:</p> <p style="padding-left: 40px;"><i>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.</i></p> <p>Suddenlink did not have procedures or a checklist as required by the aforementioned rule.</p>		
<b><u>Incomplete Records</u></b>		
<p>GO 95, Rule 80.1-A4, States in part:</p> <p style="padding-left: 40px;"><i>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 corrective action.</i></p> <p>Suddenlink did not have patrol records from 2012 to 2014 to satisfy Rule 80.1-A2.</p>		

**Incomplete Detailed Inspections**

GO 95, Rule 31.2: Inspection of Lines, States in part:

*Lines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules.*

Suddenlink did not inspect its facilities frequently and thoroughly prior to 2012 as required by GO 95, Rule 31.2. Suddenlink indicated that while it patrols and inspects its facilities in the course of other work, it does not record these patrols or inspections.

The following violations were not documented and/or addressed by Suddenlink during its patrols and inspections as required by General Order 95:

2.	<b>Location:</b>	Pole No. M31004V
	<b>Previous Suddenlink Visit Details:</b>	Not available
	<b>Date of CPUC Inspection:</b>	3/25/2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Communications Cable in Suddenlink Climbing Space</u></b></p> <p>GO 95, Rule 18-A1c: Resolution of Safety Hazards and General Order 95 Nonconformances, States in part:</p> <p><i>Where a communications company's or an electric utility' actions results in GO nonconformances for another entity, that entity's remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.</i></p> <p>A third party communications cable was installed in Suddenlink's climbing space. This violation was not noted or addressed when Suddenlink last inspected the pole. Furthermore, Suddenlink did not notify the communications company of the identified nonconformance.</p>		

**Tree Straining Suddenlink Cable**

GO 95, Rule 35: Vegetation Management, States in part:

*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).*

A Suddenlink communications cable was strained by a tree. This violation was not noted or addressed when Suddenlink last inspected the pole.

<b>3.</b>	<b>Location:</b>	Pole No. 3137CIT
	<b>Previous Suddenlink Visit Details:</b>	Not available
	<b>Date of CPUC Inspection:</b>	3/25/2014
<b>Explanation of Violation(s):</b>		
<b><u>Tree Straining Suddenlink Cable</u></b>		
GO 95, Rule 35: Vegetation Management, States in part:		
<i>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).</i>		
A Suddenlink communications cable was strained by a tree. This violation was not noted or addressed when Suddenlink last inspected the pole.		

4.	<b>Location:</b>	Pole No. M31866V
	<b>Previous Suddenlink Visit Details:</b>	Not available
	<b>Date of CPUC Inspection:</b>	3/25/2014
<b>Explanation of Violation(s):</b>		
<b><u>Tree Straining Suddenlink Cable</u></b>		
GO 95, Rule 35: Vegetation Management, States in part:		
<p><i>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).</i></p>		
A Suddenlink communications cable was strained by a tree. This violation was not noted or addressed when Suddenlink last inspected the pole.		

5.	<b>Location:</b>	Pole No. M31525V
	<b>Previous Suddenlink Visit Details:</b>	Not available
	<b>Date of CPUC Inspection:</b>	3/25/2014
<b>Explanation of Violation(s):</b>		
<b><u>Tree Straining Suddenlink Cable</u></b>		
GO 95, Rule 35: Vegetation Management, States in part:		
<p><i>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).</i></p>		
A Suddenlink communications cable was strained by a tree. This violation was not noted or addressed when Suddenlink last inspected the pole.		

6.	<b>Location:</b>	Pole No. M18070V
	<b>Previous Suddenlink Visit Details:</b>	Not available
	<b>Date of CPUC Inspection:</b>	3/25/2014
<b>Explanation of Violation(s):</b>		
<b><u>Inadequate Clearance between Suddenlink Service Drop and SCE Service Drop</u></b>		
<p>GO 95, Rule 84.8-D4: Clearances between Conductors, States in part:</p> <p><i>The radial clearance between communication service drop conductors and supply service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.</i></p> <p>A Suddenlink service drop and an SCE service drop had less than a 2 foot radial clearance more than 15 feet from the point of attachment of either service drop. This violation was not noted or addressed when Suddenlink last inspected the pole.</p>		
<b><u>Insufficient Clearance of Suddenlink Service Drop Above a Pedestrian-Accessible Area</u></b>		
<p>GO 95, Rule 84.8-C3b: Above Ground in Areas Accessible to Pedestrians Only, States:</p> <p><i>Residential Premises: Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet. EXCEPTION: If the building served does not permit an attachment which will provide this 10 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches.</i></p> <p>A Suddenlink service drop had less than the minimum required clearance of 8 feet, 6 inches above an area that is only accessible to pedestrians. This violation was not noted or addressed when Suddenlink last inspected the pole.</p>		

7.	<b>Location:</b>	Pole No. 33903
	<b>Previous Suddenlink Visit Details:</b>	Not available
	<b>Date of CPUC Inspection:</b>	3/25/2014
<b>Explanation of Violation(s):</b>		
<b><u>Suddenlink and Telephone Service Drops Touching</u></b>		
GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:  <i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i>		
A Suddenlink service drop had less than a 3 inch radial separation from a third party communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Suddenlink last inspected the pole.		

8.	<b>Location:</b>	Pole No. M18162V
	<b>Previous Suddenlink Visit Details:</b>	Not available
	<b>Date of CPUC Inspection:</b>	3/25/2014
<b>Explanation of Violation(s):</b>		
<b><u>Suddenlink and Telephone Service Drops Touching</u></b>		
GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:  <i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i>		
A Suddenlink service drop had less than a 3 inch radial separation from a third party communications cable, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Suddenlink last inspected the pole.		

9.	<b>Location:</b>	Pole No. M28200V
	<b>Previous Suddenlink Visit Details:</b>	Not available
	<b>Date of CPUC Inspection:</b>	3/25/2014
<b>Explanation of Violation(s):</b>		
<b><u>Suddenlink and Telephone Service Drops Touching</u></b>		
<p>GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, States in part:</p> <p><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 ...</i></p> <p>A Suddenlink service drop had less than a 3 inch radial separation from two third-party communications cables, as required by GO 95, Rule 38, Column C, Case 16. This violation was not noted or addressed when Suddenlink last inspected the pole.</p>		

10.	<b>Location:</b>	Pole No. M31955V
	<b>Previous Suddenlink Visit Details:</b>	Not available
	<b>Date of CPUC Inspection:</b>	3/25/2014
<b>Explanation of Violation(s):</b>		
<b><u>Telephone Service Drop Attached to Suddenlink Communications Cable</u></b>		
<p>GO 95, Rule 18-A1c: Resolution of Safety Hazards and General Order 95 Nonconformances, States in part:</p> <p><i>Where a communications company's or an electric utility's actions results in GO nonconformances for another entity, that entity's remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.</i></p> <p>A telephone service drop was attached to a Suddenlink Communications cable. This violation was not noted or addressed when Suddenlink last inspected the pole. Furthermore, Suddenlink did not notify the communications company of the identified nonconformance.</p>		