

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 9, 2015

CA2015-005

Ross Johnson
Area Manager, Regulatory
AT&T
430 Bush Street,
1st Floor, #3
San Francisco, CA 94018

Subject: Audit of AT&T's San Luis Obispo Region

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Richard Kyo of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's South Bay region from September 28, 2015 to October 2, 2015. The audit included a review of AT&T's maintenance records and field inspections of AT&T's San Luis Obispo region's facilities.

During 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 December 9, 2015, by electronic or hard copy, of all corrective measures taken by AT&T California to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Richard Kyo at (213) 576-7081 or richard.kyo@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fadi Daye'.

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

Enclosures: CPUC Audit Findings

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

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- AT&T's 2015 detailed inspection records for facilities located in AT&T's San Luis Obispo Region.
- AT&T's 2015 open and completed work orders resulting from third-party notifications and AT&T technicians' field inspections located in San Luis Obispo Region.
- Construction records and pole loading calculations for five cable installation projects located in San Luis Obispo County, completed in 2014 and 2015.

II. Records Review – Violations List

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

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.

My staff sampled 15 work orders for facilities located in the San Luis Obispo Regions with scheduled completion due dates in 2015. Out of the 15 work orders, 2 work orders were open past their completion due date.

GO 128, Rule 17.2, Inspection, states:

Systems shall be inspected by the operator frequently and thoroughly for the purpose of ensuring [sic] that they are in good condition and in conformance with all applicable requirements of these rules.

AT&T does not frequently and thoroughly inspect its facilities and address all GO 128 violations, and does not perform inspections that encompass all underground facilities. AT&T only inspected nearby underground facilities when reporting to a troubled location. AT&T's current inspection program does not meet the requirements of GO 128, Rule 17.2.

III. Field Inspections

The following are the facilities we inspected during field inspections:

Structure Number	Type of Structure	Approximate Location
N/A	Pole	167 yards south of (S/O) Old Creek Rd. and Montecito Rd., Cayucos
N/A	Pole	88 yards north of (N/O) Old Creek Rd. and Montecito Rd., Cayucos
N/A	Pole	39 yards N/O Old Creek Rd. and Montecito Rd., Cayucos
PG&E Pole No. 143994	Pole	Cayucos
PG&E Pole No. 18	Pole	Cayucos
PG&E Pole No. 19	Pole	Cayucos
N/A	Pole	463 yards N/O Old Creek Rd. and Montecito Rd., Cayucos
N/A	Pole	536 yards N/O Old Creek Rd. and Montecito Rd., Cayucos
N/A	Pole	601 yards N/O Old Creek Rd. and Montecito Rd., Cayucos
PG&E Pole No. 21-5	Pole	Cayucos
N/A	Pole	4233 San Simeon, Cambria
N/A	Pole	Cambria
N/A	Pole	35.806880, -121.3568483, Cambria
PG&E Pole No. 129876	Pole	Cambria
N/A	Pole	35.7959083, -121.3455600, Cambria
N/A	Pole	35.7959817, -121.3456017, Cambria
N/A	Pole	35.7959817, -121.3456017, Cambria
PG&E Pole No. 1370	Pole	Cambria
PG&E Pole No. 1368	Pole	Cambria
PG&E Pole No. 136788	Pole	Cayucos
PG&E Pole No. 24	Pole	Cayucos
N/A	Pole	164 yards S/O 1120 Old Creek Road, Cayucos
N/A	Pole	84.5 yards S/O 1120 Old Creek Road, Cayucos
N/A	Pole	1120 Old Creek Road, Cayucos
N/A	Pole	10585 Huer Huero Rd., Santa Margarita
N/A	Pole	5720 Los Osos Valley Road, San Luis Obispo
N/A	Pole	8600 Santa Lucia Rd., Atascadero
N/A	Pole	9480 Santa Lucia Rd., Atascadero
N/A	Pole	1 Halcon Rd., Atascadero
N/A	Pole	San Joaquin St. and Elm Ave., Morro Bay

N/A	Pole	2615 Laurel Ave., Morro Bay
N/A	Pole	201 Kern Ave., Morro Bay
N/A	Handhole	1 Los Verdes Dr., San Luis Obispo
N/A	Handhole	69 Los Verdes Dr., San Luis Obispo
N/A	Handhole	63/64 Los Verdes Dr., San Luis Obispo
N/A	Handhole	77 Los Verdes Dr., San Luis Obispo
N/A	Handhole	89 Los Verdes Dr., San Luis Obispo
N/A	Sidewalk Box	1330 Southwood Dr., San Luis Obispo
N/A	Handbox	4149 Santa Fe Rd., San Luis Obispo
N/A	Pedestal	7114 Orcut Rd., San Luis Obispo
N/A	Sidewalk Box	65 Stenner St., San Luis Obispo
N/A	Sidewalk Box	55 Stenner St., San Luis Obispo
N/A	Sidewalk Box	210 Margarita Ave., San Luis Obispo
N/A	Pedestal	2669 Spyglass Dr., Pismo Beach
N/A	Handbox	162 Bluff Dr., Pismo Beach
N/A	Handbox	146 Bluff Dr., Pismo Beach
N/A	Handbox	122 Bluff Dr., Pismo Beach

IV. Field Inspection – Undocumented Violations List

We observed the following violations during the field inspection. None of the violations were documented and/or addressed by AT&T during its last inspections:

GO 95, Rule 34, Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

- Pole No. 21-5 located in Cayucos had a barbed wire fence wrapped around its base.

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 tree branch was causing strain and abrasion on a cable supported on Pole No. 129876 located in Cambria. AT&T did not address this during its last inspection.
- A tree branch was causing strain on an AT&T cable located at 8600 Santa Lucia Rd., Atascadero. AT&T did not address this during its last inspection.

GO 95, Rule 86.9, Guy Marker (Guy Guard), states in part:

A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys.

- Two anchor guys attached to Pole No. 1370 located in Cambria did not have a guy guard.
- An anchor guy attached to Pole No. 1368 located in Cambria did not have a guy guard.

GO 95, Rule 87.7-D1, Risers, states in part:

Risers shall be protected from the ground level to a level not less than 8 feet above the ground...

- The risers on a pole located at 4233 San Simeon did not have protective covering.

V. Field Inspection – Documented Violations List

We observed the following violations during the field inspection that were documented by AT&T during its last inspections:

GO 95, Rule 86.9, Guy Marker (Guy Guard), states in part:

A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys.

- An anchor guy attached to Pole No. 136788 located in Cayucos did not have a guy guard.