

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 22, 2016

CA2016-007

Anthony Nolasco
Outside Plant Engineer
Consolidated Communications
114 Vernon St.
Roseville CA, 95661

Subject: Audit of Consolidated Communications - Roseville Exchange

Dear Mr. Nolasco:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Raymond Cho of my staff conducted a Communication Infrastructure Provider (CIP) audit of Consolidated Communications' Roseville Exchange from May 9, 2016 to May 11, 2016. The audit included a review of Consolidated Communications' maintenance records and field inspection of the Roseville Exchange 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 August 23, 2016, by electronic or hard copy, of all corrective measures taken by Consolidated Communications to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosure: 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:

- Construction Work Requests – March 1, 2016 through May 6, 2016
- Service Drop Installation Work Orders – March 1, 2016 through May 6, 2016
- Stoneridge Village 12 Project
- Stoneridge Parcel 58 Project
- Old Auburn Ranch Project
- 501 Shasta St. Pole Loading Calculation
- 210 Tahoe St. Pole Loading Calculation
- Sphan Ranch Pole Loading Calculation
- Barton Rd. Pole Loading Calculation

II. Records Review – Violations

GO 95, Rule 18-A2a, states in part:

All companies shall establish an auditable maintenance program for their facilities and lines. All companies must include a timeline for corrective actions to be taken following the identification of a Safety Hazard or nonconformances with General Order 95 on the company's facilities. The auditable maintenance program shall prioritize corrective actions consistent with the priority levels set forth below and based on the following factors, as appropriate ...

Consolidated Communication's maintenance program did not include corrective action dates and did not have any provision to prioritize corrective actions.

GO 95, Rule 80.1-A2, Statewide Inspection Requirements, states:

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*

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(B).

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.

Consolidated Communications' program does not include a procedure to identify problems discovered during inspections.

GO 128, Rule 17.1, Inspection, 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 these rules (See Rule 12.3).

Consolidated Communications does not frequently and thoroughly inspect its underground facilities. Inspections are completed only when workers access a pole with a ladder or a climbing gear.

III. Field Inspection

The following are the facilities we inspected during the field inspection:

Structure Number	Type of Structure	Location
P.10667	Pole Job SWTC16010	Granite Bay
210 Tahoe Ave.	Pole	Roseville
501 Shasta St.	Pole	Roseville
P.5593	Pole Job 65CTH15081	Roseville
3345 Braeburn St.	Pole	Sacramento
4425 Sycamore Ave.	Pole	Sacramento
Barton Rd. North of Greystone Pl.	Pole	Granite Bay
Barton Rd. 200 ft. North of Willhoff Ln.	Pole	Granite Bay
5040 Whisper Way	Pole	Granite Bay
28 Castle Hill Ct.	Underground Vault	Roseville
105 Spring Ct.	Underground Vault	Roseville
200 Bald Eagle Ct.	Underground Vault	Roseville
3081 Walcott Way	Pedestal and Hand Hole	Roseville
3064 Walcott Way	Pedestal	Roseville
3040 Walcott Way	Pedestal and Hand Hole	Roseville
3000 Walcott Way	Pedestal	Roseville
3687 Copperleaf St.	Hand Hole	Roseville
3609 Miners Ravine Rd.	Hand Hole	Roseville
3672 Miners Ravine Rd.	Hand Hole	Roseville
Brightside Ln. and Old Auburn Rd.	Passive Splitter Cabinet	Roseville
Brightside Ln., Lot 20	Hand Hole	Roseville
Crystal Pond Ct., Lot 19	Pedestal	Roseville
Brightside Ct., Lot 9	Pedestal	Roseville
Brightside Ln., Lot 23	Pedestal	Roseville
6917 Mellodora Dr.	Underground Vault	Orangevale
8012 Alma Mesa Dr.	Pole	Citrus Heights
6120 Trajan Dr.	Underground Vault	Fair Oaks
8413 Juglans Dr.	Underground Vault	Orangevale
6921 Lonicera Dr.	Underground Vault	Orangevale
6549 Deaderick Ct.	Underground Vault	Orangevale
6529 Deaderick Ct.	Underground Vault	Orangevale
7400 Pratt Ave.	Pole	Citrus Heights
11200 Lauppe Ln.	Underground Vault	Citrus Heights

7100 Witchinghour Ct.	Underground Vault	Citrus Heights
6701 Auburn Blvd.	Underground Vault	Citrus Heights
625 Mayfair Dr.	Underground Vault	Roseville
4502 44 th St.	Pole	Sacramento
3020 San Carlos Way	Pole	Sacramento
3779 9 th Ave.	Pole	Sacramento
4316-1/2 34 th St.	Pole	Sacramento
417 San Antonio Way	Pole	Sacramento
2516 Portola Way	Pole	Sacramento
2323 Portola Way	Pole	Sacramento
4204 E. Nichols Ave Apt. #2	Pole	Sacramento

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 Consolidated Communications during its last inspections:

GO 95, Rule 84.7-A, Climbing Space, states in part:

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.

Two Consolidated Communications conductors installed on the pole located at 8012 Alma Mesa Dr. impeded the climbing space.

GO 95, Rule 84.8-D4, Above or below Supply Service Drops, states:

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.

A Consolidated Communications service drop located at 2323 Portola Way was 3 inches away from an electric service drop.

GO 95, Rule 38, case 16-C, requires that the radial clearance between communication conductors of different companies to be no less than 3 inches.

A Consolidated Communications service drop was in contact with another communication provider's facilities at the following locations:

- 2516 Portola Way
- 4204 E. Nichols Ave., Apt. #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.

A Consolidated Communications riser on the pole in front of 7400 Pratt Ave. was damaged.

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.

The inner structure inside an underground vault at 6529 Deaderick Way was damaged. The divider between electric facilities and Consolidated Communications' facilities had collapsed.

A work order for the underground vault at 6549 Deaderick Way was marked complete even though the work was not completed during our audit.

GO 128, Rule 34.3-C, Locking, states:

Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.

Consolidated Communications' distribution pedestals at the following locations were not locked:

- 3081 Walcott Way
- 3000 Lennon Dr.