

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 18, 2021

CA2020-872

Susan Lipper
Director, State Government Affairs
T-Mobile
1755 Creekside Oaks Drive, Suite 190
Sacramento, CA 95833-3662

SUBJECT: Audit of T-Mobile San Diego District

Ms. Lipper:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Eric Ujiiye, Calvin Choi, and Mily Vaidya of my Staff conducted a Communication Infrastructure Provider (CIP) audit of T-Mobile's San Diego Region from October 12, 2020 to October 16, 2020. The audit included a review of T-Mobile's records and field inspections of 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 March 18, 2021, by electronic or hard copy, of all the corrective measures taken by T-Mobile to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Eric Ujiiye at (213) 620-2598 or Eric.Ujiiye@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

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- T-Mobile documented inspection program.

II. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Site Id	Type of Structure	Address	City
1	SD06912A	Cellular Antenna	Judy Ln. & Lahoud Dr.	San Diego
2	SD06638A	Cellular Antenna	Village Park Way & Mountain Vista Dr	Encinitas
3	SD06929A	Cellular Antenna	1902 1/2 California Street	Oceanside
4	SD06927B	Cellular Antenna	Grandview St. Row	Oceanside
5	SD07102A	Cellular Antenna	7708 1/2 El Camino Real	Oceanside
6	SD06194A	Cellular Antenna	416-3/4 Shadow Tree Drive	Oceanside
7	SD06681A	Cellular Antenna	328 1/2 Festival Dr.	Oceanside
8	SD06682A	Cellular Antenna	5003 1/2 Douglas Dr.	Oceanside
9	SD06683A	Cellular Antenna	5181 1/2 Douglas Dr.	Oceanside
10	SD06743A	Cellular Antenna	592 1/2 Vandegrift Blvd.	Oceanside
11	SD06909A	Cellular Antenna	5000 Sea Drift Way	San Diego
12	SD06986A	Cellular Antenna	556 Terra Nova Dr.	Chula Vista
13	SD06355A	Cellular Antenna	1055 Rancho Del Rey Pkwy	Chula Vista
14	SD07010A	Cellular Antenna	10156 Challenger Court	Spring Valley
15	SD06992A	Cellular Antenna	2672 Massachusetts Ave.	Lemon Grove
16	SD06310A	Cellular Antenna	1157 East Madison Ave.	El Cajon
17	SD07003A	Cellular Antenna	8400 Via Sonoma	La Jolla
18	SD06620B	Cellular Antenna	9486 Babauta Road	Mira Mesa
19	SD07290A	Cellular Antenna	Calle Cristobal & Windy Ridge Way	Mira Mesa
20	SD06757B	Cellular Antenna	14507 Meadowrun Street	Mira Mesa
21	SD06524A	Cellular Antenna	16534 Espola Road	Poway
22	SD07129A	Cellular Antenna	1162 Avocado Ave	Escondido
23	SD06968A	Cellular Antenna	12759 Poway Road	Escondido
24	SD07083A	Cellular Antenna	700 Rose Ranch Road	San Marcos
25	SD06589B	Cellular Antenna	1441 N. Twin Oaks Valley Road	San Marcos
26	SD06848B	Cellular Antenna	1387 West Borden Road	San Marcos

III. Field Inspection Violations List

We observed the following violations during the field inspections:

GO 95, Rule 18-B, Reporting and Resolution of Safety Hazards Discovered by Utilities, states in part:

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. To the extent the inspecting company cannot determine the facility owner/operator, it shall contact the pole owner(s), who shall be responsible for promptly notifying the company owning/operating the facility with the safety hazard(s), normally not to exceed five business days after being notified of the safety hazard. The notification shall be documented, and such documentation must be preserved by all parties for at least ten years.

- T-Mobile failed to report a third-party pedestal located adjacent to T-Mobile Site SD0691A which had a deteriorated cabinet that detached from its base and exposed internal components to the public.

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.

T-Mobile facilities at the following sites required maintenance:

- Site SD06927A: the access panel cover on the cellular antenna pole was missing.
- Site SD06986A: the access panel cover on the cellular antenna pole was missing bolts.

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.

T-Mobile facilities at the following sites required maintenance:

- Site SD06638A: the vault intake vent cover was missing the attachment bolts that secure the cover to the ground.
- Site SD06929A: the vault exhaust vent cover was missing the attachment bolts that secure the cover to the ground.
- Site SD06681A: the power supply meter pedestal lock was broken and unlocked,
- Site SD06681A: a hand hole entrance was obstructed by surrounding vegetation.

- Site SD06682A: the power supply meter pedestal was damaged and unsecured exposing the internal facilities of the pedestal.
- Site SD06909A: the vault entrance lid was damaged, allowing dirt and debris into the vault that required the internal equipment to be covered by a tarp.
- Site SD06986A: the vault exhaust vent cover was missing the attachment bolts that secure the cover to the ground.
- Site SD06992A: the vault intake vent cover was missing the attachment bolts that secure the cover to the ground.
- Site SD06524B: the access door to the power supply meter pedestal was obstructed by surrounding vegetation.
- Site SD06524B: the oxygen alarm sensor and the climate control for the vault at was not functioning.
- Site SD06848B: the vault intake vent cover was missing the attachment bolts that secure the cover to the ground.

GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures, states:

Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.

Each structure at the following T-Mobile sites was not marked as to ownership:

- Site SD06681A: a hand hole was not marked and identified as to ownership.
- Site SD06992A: a vault was not marked as to ownership.
- Site SD07129A: a vault was not marked as to ownership.
- Site SD06589A: a vault was not marked as to ownership.

GO 128, Rule 42.7, Covers, states:

Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal.

The T-Mobile hand hole cover at the following sites was not secured:

- Site SD06681A: a hand hole cover lid was not bolted or secured to prevent unauthorized access.
- Site SD06682A: a hand hole cover lid was not bolted or secured to prevent unauthorized access.