

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 6, 2022

CA2021-901

Ross Johnson
AT&T Director of Regulatory Relations
430 Bush Street, 5th Floor
San Francisco, CA 94108

SUBJECT: Audit of AT&T's Los Angeles County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, James Miller and Richard Le of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's Los Angeles County District from May 24, 2021 to May 25, 2021. The audit included a review of AT&T's inspection and maintenance records and a field inspection of AT&T communication 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 May 6, 2022, by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

If you have any questions concerning this audit, please contact James Miller at (213) 660-8898 or James.Miller@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, ESRB, CPUC
Majed Ibrahim, Senior Utilities Engineer Supervisor, ESRB, CPUC
James Miller, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- AT&T's Intrusive Inspection of Wood Poles
- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines

II. Field Inspection

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

No.	Structure Identification	Structure Type	Location
1	759865H	Pole	La Crescenta
2	759864H	Pole	La Crescenta
3	762738H	Pole	La Crescenta
4	762739H	Pole	La Crescenta
5	762740H	Pole	La Crescenta
6	762741H	Pole	La Crescenta
7	762742H	Pole	La Crescenta
8	762743H	Pole	La Crescenta
9	762744H	Pole	La Crescenta
10	4557420E	Pole	Canoga Park
11	4557421E	Pole	Canoga Park
12	4557422E	Pole	Canoga Park
13	4557423E	Pole	Canoga Park
14	4557424E	Pole	Canoga Park
15	2114189E	Pole	Canoga Park
16	2114188E	Pole	Canoga Park
17	2114187E	Pole	Canoga Park
18	3004797E	Pole	Aguora Hills
19	4744031E	Pole	Aguora Hills
20	4664062E	Pole	Aguora Hills
21	543191H	Pole	Aguora Hills
22	466063E	Pole	Aguora Hills
23	1638838E	Pole	Aguora Hills
24	3002671E	Pole	Aguora Hills
25	756233H	Pole	Aguora Hills
26	4963928E	Pole	Aguora Hills
27	4010096E	Pole	Palmdale
28	4010097E	Pole	Palmdale
29	4010098E	Pole	Palmdale
30	2301465E	Pole	Palmdale
31	2322729E	Pole	Palmdale
32	2208691E	Pole	Palmdale
33	2208690E	Pole	Palmdale
34	2208689E	Pole	Palmdale
35	1310104E	Pole	Little Rock
36	1310105E	Pole	Little Rock
37	1310106E	Pole	Little Rock
38	1310107E	Pole	Little Rock

39	1847292E	Pole	Little Rock
40	1373185E	Pole	Little Rock
41	1490909E	Pole	Little Rock
42	1490908E	Pole	Little Rock
43	4590838E	Pole	Little Rock
44	617940E	Pole	Little Rock
45	699214E	Pole	Little Rock
46	699212E	Pole	Little Rock
47	617942H	Pole	Little Rock
48	699211E	Pole	Little Rock
49	617943E	Pole	Little Rock
50	699210E	Pole	Little Rock
51	1769448E	Pole	Little Rock
52	699208E	Pole	Little Rock
53	699209E	Pole	Little Rock
54	2226636E	Pole	Little Rock
55	4704374E	Pole	Leona Valley
56	682245E	Pole	Leona Valley
57	682246E	Pole	Leona Valley
58	4940403E	Pole	Leona Valley
59	4073768E	Pole	Leona Valley
60	4858748E	Pole	Leona Valley
61	759858E	Pole	Leona Valley
62	759859E	Pole	Leona Valley
63	759860E	Pole	Leona Valley
64	759861E	Pole	Leona Valley
65	759862E	Pole	Leona Valley
66	800' south of Silver Spur Ln on Crown Valley Rd.	Pole	Acton
67	2301522E	Pole	Acton
68	2301521	Pole	Acton
69	2294033E	Pole	Acton
70	2294032E	Pole	Acton
71	1030927E	Pole	Acton
72	1030928E	Pole	Acton
73	4144803E	Pole	Acton
74	4244804E	Pole	Acton
75	4244805E	Pole	Acton
76	4244806E	Pole	Acton
77	4244807E	Pole	Acton
78	4244808E	Pole	Acton
79	4244809E	Pole	Acton

80	4244810E	Pole	Acton
81	815 Gian Dr	Pedestal	Torrance
82	711 Gian Dr.	Pedestal	Torrance
83	22600 Menlo Ave.	Pedestal	Torrance
84	22611 Menlo Ave.	Pedestal	Torrance
85	22703 Menlo Ave.	Pedestal	Torrance
86	803 Gian Dr.	Hand Hole	Torrance
87	2262 232nd St.	Hand Hole	Torrance
88	2252 232nd St.	Hand Hole	Torrance
89	2227 232nd St.	Hand Hole	Torrance
90	2212 232nd St.	Service Area Interface	Torrance
91	2245 232nd St.	Hand Hole	Torrance
92	17007 Steven St.	Hand Hole	Gardena
93	17011 Steven St.	Hand Hole	Gardena
94	17019 Steven St.	Hand Hole	Gardena
95	17027 Steven St.	Hand Hole	Gardena
96	17103 Steven St.	Hand Hole	Gardena
97	17111 Steven St.	Hand Hole	Gardena
98	17124 Steven St.	Hand Hole	Gardena
99	624 W. Myrrh Ln.	Pedestal	Compton
100	482 Sherer Pl.	Pedestal	Compton
101	438 Sherer Pl.	Pedestal	Compton
102	618 W. Gladys St.	Pedestal	Compton
103	400 Sherer Pl.	Service Area Interface	Compton
104	408 Sherer Pl.	Pedestal	Compton
105	606 W. Laurel St.	Pedestal	Compton
106	605 W. Laurel St.	Pedestal	Compton
107	1424 Cuesta Wy.	Hand Hole	Montebello
108	1416 Cuesta Wy.	Hand Hole	Montebello
109	1406 Cuesta Wy.	Hand Hole	Montebello
110	1400 Cuesta Wy.	Hand Hole	Montebello
111	824 Taylor Ave	Hand Hole	Montebello
112	836 Taylor Ave	Hand Hole	Montebello
113	1408 El Camino Dr.	Hand Hole	Montebello
114	1412 El Camino Dr.	Hand Hole	Montebello
115	402 Commonwealth Ave.	Sub Box	Alhambra
116	302 Commonwealth Ave.	Sub Box	Alhambra
117	East of Commonwealth Ave. & Third St.	Service Area Interface	Alhambra
118	212 Commonwealth Ave.	Sub Box	Alhambra

119	465304H	Pole	La Cañada Flintridge
120	4874425E	Pole	Altadena
121	1011PBM	Pole	Altadena
122	4874425E/763094H	Pole	Altadena
123	763093H	Pole	Altadena
124	806625H	Pole	Altadena
125	1022006H	Pole	Altadena
126	4458506	Pole	La Cañada Flintridge
127	472470E	Pole	La Cañada Flintridge
128	472469E	Pole	La Cañada Flintridge
129	1901067E	Pole	La Cañada Flintridge
130	883923E	Pole	La Crescenta-Montrose
131	458126E	Pole	La Crescenta-Montrose
132	320557A	Pole	La Crescenta-Montrose
133	6790104H	Pole	Highland Park
134	464978H	Pole	Highland Park
135	4910604E	Pole	Simi Valley
136	Between 4910604E & 4215748E	Pole	Simi Valley
137	4215748E	Pole	Simi Valley
138	2016101E	Pole	Simi Valley
139	4946830E	Pole	Simi Valley

III. Field Inspection – Violations List

We observed the following violations during the field inspections:

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8 requires the minimum radial clearance between communication conductors and/or supply drops on the same pole to be twelve inches.

- An AT&T conductor was in contact with a third-party communications conductor between poles numbered 759865H and 759864H.
- An AT&T service drop was in contact with a third-party communications service drop near Pole 762742H.
- An AT&T conductor was in contact with a third-party communications conductor near Pole 4557422E.
- An AT&T service drop was in contact with a third-party communications conductor between poles numbered 4744031E and 3004797E.
- Two AT&T conductors were in contact between poles numbered 4664063E and 1638838E.
- An AT&T conductor and a third-party communications conductor had approximately four inches of clearance between poles numbered 3002671E and 756233H.
- An AT&T conductor and a third-party communications service drop were in contact near Pole 2208690E.
- An AT&T conductor was in contact with a third-party communications conductor between poles numbered 4704374E and 682245E.
- An AT&T conductor was in contact with a third-party communications service drop near Pole 682245E.
- An AT&T conductor and a third-party communications conductor had approximately one inch of clearance near Pole 4940403E.
- An AT&T conductor and a third-party communications conductor had approximately three inches of clearance on Pole 4073768E.
- An AT&T conductor and a third-party communications service drop were in contact between poles numbered 4073768E and 4858748.
- An AT&T conductor was in contact with a third-party communications conductor between poles numbered 759860E and 759860E.
- An AT&T conductor and a third-party communications conductor had approximately four inches of clearance between poles numbered 759861E and 759862E.
- An AT&T conductor was in contact with a third-party communications conductor between poles numbered 2016101E and 4946830E.

GO 95, Rule 56.2, Uses (Guy Wires), states in part:

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.

AT&T down guy wires attached to poles numbered 762740H and 1490909E were not taut.

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

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight 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.

An unauthorized advertising an estate sale sign was attached to Pole 1030927H

GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:

The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.

The lowest pole step on each of the following poles was located at a height of less than eight feet:

- 756233H
- The unmarked pole located 800' south of Silver Spur Lane on Crown Valley Road

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.

The AT&T facilities on each of the following poles were not maintained for their intended use:

- The casing on an AT&T riser was damaged on Pole 2208691E.
- The lashing wire on an AT&T conductor attached to Pole 1310106E was broken.
- The pole north of Pole 4590838E had a damaged pole tag.
- Pole 699212E had a damaged pole tag.

GO 95, Rule 92.4-D1 – Exposed Cables and Messengers states in part:

The exposed communications conductors and messengers shall be grounded: At all deadend poles and at intervals not greater than every one-quarter of a mile (1320 feet).

AT&T messenger wires were not grounded at the following deadend poles:

- 2208689E
- 4704374E

GO 95, Rule 31.6, Abandoned Lines, states:

Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.

AT&T service drops attached to each of the following poles were abandoned:

- 4590838E
- 4858748E

GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground:

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

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8.

The AT&T riser on Pole 2226636E lacked a suitable covering.

GO 95, Rule 84.8-C3b: Above Ground in Areas Accessible to Pedestrians Only, states in part:

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.

An AT&T service drop attached to pole P759858E had an above ground clearance of approximately six feet above a residential front yard.

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.

- The service area interface located at 2212 232nd Street was missing its door handle, and the door could not be closed all the way.

- The handhole at 1424 Cuesta Way had damaged or missing lid grips.
- The terminal in the hand hole at 1400 Cuesta Way was missing its case.
- The hand-hole at 824 Taylor Avenue's lid could not be closed because it was too full.

GO 128 Rule 34.3, Self-contained Surface-mounted Equipment, states in part:

Equipment installed partially or completely above the ground surface and not enclosed by a vault, room or fence shall conform to the following:

...

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

The pedestal located at 605 West Laurel Street was unsecured.