

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 27, 2022

CA2022-1016

Rex Knowles
Director- Government Affairs
Verizon Wireless

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Verizon North Bay Region

Dear Mr. Knowles:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Dmitriy Lysak of ESRB staff conducted a CIP audit of Verizon North Bay Region from August 15, 2022 through August 16, 2022. During the audit, ESRB staff conducted field inspections of Verizon's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations is enclosed.

Please provide a response no later than October 25, 2022, via electronic copy of all corrective actions and preventive measures taken by Verizon to correct the identified violations and prevent the recurrence of such violations. The response should indicate the date of each remedial action and preventive measure taken for the violations. For any outstanding items not addressed, please provide the projected completion dates of Verizon's corrective actions.

If you have any questions concerning this audit, please contact Emiliano Solorio at (916) 216-0249 or emiliano.solorio@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Banu Acimis".

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

Enclosure: CPUC Audit Findings of Verizon North Bay Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC

Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC

Rickey Tse, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC

Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC

Dmitriy Lysak, Utilities Engineer, ESRB, SED, CPUC

**CPUC AUDIT FINDINGS OF VERIZON
NORTH BAY REGION**

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- Verizon’s Pole Inspection Program
- Verizon’s Inspection Training Program
- Sonoma County Verizon Wireless Facility Statistics
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the Last 5 Years
- Sonoma County Work Orders in the Last 5 Years
- Safety Hazards Notifications Verizon Received from and Sent to Third Parties in the Last 5 Years
- Sonoma County Pole Loading Calculations Conducted in the Last 5 Years

II. Records Violations

ESRB observed the following violations during the record review portion of the audit:

1. GO 95, Rule 80.1-A(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District states in part:

“In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table.”

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

Commission Decision, D.17-12-024, Ordering Paragraph #4 states, *“With the exception of implementations instructions set forth in Ordering Paragraphs 2 and 3, the new amended regulations adopted by today’s Decision that apply to Zone 1, Tier 2, and/or Tier 3 of the High Fire Threat District shall be:*

- i. Fully implemented in Tier 3 statewide by September 1, 2018, including full requirements pertaining to frequency of inspections ...
- ii. Fully implemented in Tier 2 statewide by September 1, 2019, including full requirements pertaining to frequency of inspections ...”

ESRB’s review of Verizon’s completed patrol and detailed inspections found that Verizon had a late patrol inspection in 2019 for SC 010 (PS Location # 418651). Verizon conducted a detailed inspection of SC 010 on June 11, 2021. The inspection was conducted 527 days past its inspection due date.

III. Field Inspection

During the field inspection from August 15 through 16, 2022, ESRB staff inspected Verizon’s wireless communication facilities in the locations listed in Table 1. All field inspection locations are in the city of Santa Rosa:

Table 1: Field Inspection Locations

Location #	Address	Structure Type	Structure #
1	3298 Old Petaluma Hill Rd.	Pole	SC 060
2	730 Aston Ave.	Pole	SC 029
3	1680 Allan Wy.	Pole	SC 028
4	628 Mill St.	Pole	SC 047
5	716 Brigham Ave.	Pole	SC 048
6	1095 South A St.	Pole	SC 025
7	450 Kawana Springs Rd.	Pole	SC 027
8	3373 Summerfield Rd.	Pole	SC 024
9	3733 Sebastopol Rd.	Pole	SC 057
10	2270 Donahue Ave.	Pole	SC 056
11	435 Tracy Ave.	Pole	SC 035
12	998 Fulton Rd.	Pole	SC 036
13	2001 Piner Rd.	Pole	SC 064
14	725 Link Ln.	Pole	SC 038
15	709 Leo Dr.	Pole	SC 004
16	118 W. 6 th St.	Pole	SC 053
17	5425 Montgomery Rd.	Pole	SC 002
18	610 Los Alamos Rd.	Pole	SC 001
19	1633 St. Francis Rd.	Pole	SC 005
20	5110 Monte Verde Dr.	Pole	SC 007
21	835 Montrose Ct.	Pole	SC 008

Location #	Address	Structure Type	Structure #
22	24 Redwood Ct.	Pole	SC 009-A Equipment not in service
23	3853 Highway 12	Pole	SC 011
24	1590 Brush Creek Rd.	Pole	SC 010
25	3885 Chanate Rd.	Pole	SC 014
26	2300 Lomitas Ave.	Pole	SC 020
27	2801 Yulupa Ave.	Pole	SC 003
28	1259 Hahman Dr.	Pole	SC 032
29	424 Farmers Ln.	Pole	SC 066
30	2700 4 th St.	Pole	SC 055
31	1821 4 th St.	Pole	SC 012
32	1010 King St.	Pole	SC 034

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

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

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property...”

GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

“(3) 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 entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO95.

Note: Each pole owner must be able to determine all other pole owners on poles it owns. Each pole owner must be able to determine all authorized entities that attach equipment on its portion of a pole.”

ESRB’s findings are listed in Table 2:

Table 2: GO 95, Rule 18-A Findings

Location #	Findings
4	Communication line in contact with Verizon antenna lines on pole. Verizon shall issue third party notification to clear lines.
7	Unsecured communication box dangling on pole. Verizon shall issue third party notification to owner to mitigate hazard.
12	Communication lines on buddy pole. Verizon shall issue third party notification to owner to transfer communication lines to new pole.

2. GO 95, Rule 94.3A, General Requirements states:

“Antennas shall meet the requirements of Class C equipment, unless otherwise specified in this rule.”

GO 95, Rule 84.6B, Ground Wires states in part:

“Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.”

ESRB’s findings are listed in Table 3:

Table 3: GO 95, Rule 84.6B Findings

Location #	Findings
1	Ground wire exposed.
10	Ground wire exposed. Ground molding separated from pole.

Location #	Findings
15	Ground molding separated from pole.
16	Ground molding covered less than 7 feet above ground.
17	Ground wire exposed at base of pole.
20	Ground wire exposed.
28	Ground molding separated from pole.
31	Ground wire exposed.

3. GO 95, Rule 94.5A, Marking states:

“Joint use poles shall be marked with a sign for each antenna installation as follows:

- (1) Identification of the antenna operator*
- (2) A 24-hour contact number of antenna operator for Emergency or Information*
- (3) Unique identifier of the antenna installation.”*

ESRB identified locations 5 through 9, 13 through 18, 20, 23, 24, and 26 through 32 without any Verizon identification which is a violation of GO 95, Rule 94.5A. ESRB also noted that Location 28 has no Verizon identification, no emergency contact number, and no unique identifier.

4. GO 95, Rule 94.6B, Climbing Space states:

“Climbing space above communication lines shall be maintained in accordance with Rule 84.7 to:

- (1) The bottom of the Antenna (including associated support elements) at the top of the pole or pole-top extension when affixed less than eight inches from the surface of the pole.*
- (2) The top of the pole or pole-top extension if the Antenna (including associated support elements) is affixed more than eight inches from the surface of the pole or pole-top extension.*

(3) *The bottom of the uppermost Antenna (including associated support elements) if multiple Antennas are present at different levels.”*

ESRB found that vegetation impedes climbing space for SC 010 at Location # 24 which is violation of GO 95, Rule 94.6B.

5. GO 95, Rule 94.3A, General Requirements states:

“Antennas shall meet the requirements of Class C equipment, unless otherwise specified in this rule.”

GO 95, Rule 89.3, Telephone Instruments on Poles or Structures states:

“Where a telephone instrument is attached to the surface of a pole or structure at less than 8 feet vertically above the ground (or at any elevation on a grounded metal pole or structure) and is connected to a private communication circuit constructed on the same pole line with, or colinear with, a Class H supply circuit, or is connected to a private communication circuit carried on crossarms with supply conductors of 750 – 22,500 volts, such instrument shall be enclosed in a suitable box of wood or equivalent insulating material, which shall be locked to prevent access by unauthorized persons. Where such a telephone instrument is so attached, connected, and enclosed, unless isolated from the communication circuit by an adequate insulating transformer, a suitably insulated stool or platform, on which a person can stand while using the instrument, shall be provided.”

ESRB’s findings are listed in Table 4:

Table 4: GO 95, Rule 89.3 Findings

Location #	Findings	Notes
7	SC 027 missing lock on meter panel.	Lock was added by Verizon on site.
17	SC 002 missing lock on disconnect switch.	

6. 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.”

ESRB determined that SC 055 has meter panel opened on Verizon ground mounted equipment at Location # 30 which is violation of GO 128 Rule 17.1.

7. 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.”

ESRB’s findings are listed in Table :

Table 5: GO 128, Rule 17.8 Findings

Location #	Findings
9	No Verizon ownership on ground mounted equipment serving SC 057.
13	No Verizon ownership on ground mounted equipment serving SC 064.
17	No Verizon ownership on ground mounted equipment serving SC 002.
18	No Verizon ownership on ground mounted equipment serving SC 001.
21	No Verizon ownership on ground mounted equipment serving SC 008.
24	No Verizon ownership on ground mounted equipment serving SC 010.
30	No Verizon ownership on ground mounted equipment serving SC 055.