

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 27, 2023

CA2022-939

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

**SUBJECT:** Audit of AT&T Orange County North Area

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujiiye, and Mily Vaidya of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T Orange County North Area from August 22, 2022, to August 26, 2022. The audit included a review of AT&T's Orange County North inspection and maintenance records and a field inspection of AT&T's Orange County North Area facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). An itemized copy of the audit findings violations identified by Staff is enclosed along with this letter. Please advise me no later than February 27, 2023, by electronic or hard copy, of all corrective measures taken by AT&T to remediate and prevent such violations.

If you have any questions concerning this audit, please contact Eric Ujiiye at (213) 620-2598 or [Eric.Ujiiye@cpuc.ca.gov](mailto: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:

- Overhead detailed and patrol 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. Records Review – Violations List

Staff observed the following violations during the records review portion of the audit:

**GO 95, Rule 31.2, Inspection of Lines**, states in part:

*Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

**GO 95, Rule 80.1-A.2, Statewide Inspection Requirements**, states in part:

*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.*

Based on AT&T's inspection procedures and inspection records, AT&T failed to patrol multiple routes within the required timeframe:

- AT&T did not complete 13 patrol inspections in a Tier 2 High Fire Threat Area.
- AT&T completed 54 patrol inspections in a Tier 3 High Fire Threat Area past the required time frame.

**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.*

**GO 95, Rule 18, Rule 18-B1, Maintenance Programs**, states in part:

*Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate*

...

**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.*

AT&T failed to complete three Level 1 work orders by their scheduled due date for corrective action (72 hours, per AT&T's "Overhead Lines Maintenance Plan").

### III. Field Inspection

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

No.	Structure ID	Structure Type	Location
1	1478430E	Pole	Orange
2	1478431E	Pole	Orange
3	4324102E	Pole	Orange
4	1549797E	Pole	Orange
5	4908146E	Pole	Orange
6	X8173T	Pole	Orange
7	1953901E	Pole	Orange
8	1953902E	Pole	Orange
9	1953903E	Pole	Orange
10	2256894E	Pole	Orange
11	704993H	Pole	Santa Ana
12	1479224E	Pole	Santa Ana
13	4843135E	Pole	Santa Ana
14	1058568E	Pole	Santa Ana
15	Toddy St. & Hazard Ave	Pole	Santa Ana
16	1058569E	Pole	Santa Ana
17	1060580H	Pole	Santa Ana
18	1409969E	Pole	Santa Ana
19	4843136E	Pole	Santa Ana
20	1060581H	Pole	Santa Ana
21	4852583E	Pole	Santa Ana
22	215 W. Washington Ave	Pole	Santa Ana
23	1335003E	Pole	Santa Ana
24	1 pole e/o 1335003E	Pole	Santa Ana
25	2 poles e/o 1335003E	Pole	Santa Ana
26	1810099E	Pole	Garden Grove
27	2341048E	Pole	Garden Grove
28	1810098E	Pole	Garden Grove
29	1810097E	Pole	Garden Grove
30	1027440H	Pole	Garden Grove
31	1212377E	Pole	Garden Grove
32	270687E	Pole	Garden Grove
33	1912143E	Pole	Santa Ana
34	1912142E	Pole	Santa Ana
35	1912141E	Pole	Santa Ana

36	1912140E	Pole	Santa Ana
37	4506959E	Pole	Santa Ana
38	680277H	Pole	Santa Ana
39	e/o 680277H	Pole	Santa Ana
40	2 poles e/o 680277H	Pole	Santa Ana
41	253470	Pole	Santa Ana
42	1037535H	Pole	Santa Ana
43	1057089H	Pole	Santa Ana
44	1839	Pedestal	Fullerton
45	1831	Pedestal	Fullerton
46	1817	Pedestal	Fullerton
47	1801	Pedestal	Fullerton
48	Opp 1801	Cabinet	Fullerton
49	Opp 1801	Handhole	Fullerton
50	1809	Pedestal	Fullerton
51	1825	Pedestal	Fullerton
52	1839	Pedestal	Fullerton
53	1847	Pedestal	Fullerton
54	1863	Pedestal	Fullerton
55	1871	Pedestal	Fullerton
56	1859	Pedestal	Fullerton
57	4698195E	Pole	Yorba Linda
58	1440306E	Pole	Yorba Linda
59	1426920E	Pole	Yorba Linda
60	1426921E	Pole	Yorba Linda
61	1426960E	Pole	Yorba Linda
62	1426959E	Pole	Yorba Linda
63	4431969E	Pole	Yorba Linda
64	1077757E	Pole	Yorba Linda
65	2324635E	Pole	Yorba Linda
66	1542036E	Pole	Yorba Linda
67	1542037E	Pole	Yorba Linda
68	414352E	Pole	Yorba Linda
69	414353E	Pole	Yorba Linda
70	1498552E	Pole	Brea
71	1498554E	Pole	Brea
72	1498555E	Pole	Brea
73	4578380E	Pole	Buena Park
74	1357200E	Pole	Buena Park
75	712996E	Pole	Buena Park

76	1357199E	Pole	Buena Park
77	1357198E	Pole	Buena Park
78	1357197E	Pole	Buena Park
79	733602E	Pole	Buena Park
80	733601E	Pole	Buena Park
81	1357196E	Pole	Buena Park
82	1357195E	Pole	Buena Park
83	1032350	Pole	Yorba Linda
84	4458280E	Pole	Yorba Linda
85	4430154E	Pole	Yorba Linda
86	1894452E	Pole	Yorba Linda
87	5585	Pedestal	Yorba Linda
88	5555	Pedestal	Yorba Linda
89	5530	Pedestal	Yorba Linda
90	5490	Pedestal	Yorba Linda
91	5470	Pedestal	Yorba Linda
92	28015	Pedestal	Yorba Linda

#### **IV. Field Inspection - Violations List**

My staff observed the following violations during the field inspections:

#### **GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:**

*(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 10 business days after the discovery.*

Safety hazards on the following poles were not documented and reported to the responsible third parties during AT&T's latest inspections:

- Pole 1058568E: a third-party communications span conductor had a broken lashing wire.
- One pole east of 1335003E: a secondary supply conductor was sagging and contacting AT&T's communications conductor.

#### **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.*

Facilities on the following poles required maintenance:

- Pole 4324102E: a conductor span needs to be transferred from a "buddy pole"
- Pole 4908146E: a communications conductor lashing wire was damaged and hanging.
- Pole 704993H: a 2" riser was not attached to the surface of the pole at the public level.
- Pole 4852583E: a span guy was damaged and detached from the pole.
- Pole 1542036E: a communications conductor lashing wire was damaged and hanging.
- Pole 1542036E: the down guy attachment point at the anchor was completely buried. This nonconformance was corrected by AT&T personnel at the time of the field visit.
- Pole 414352E: a communications conductor lashing wire was damaged.
- Pole 1357195E: a riser was not attached to the surface of the pole at the public level.

**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.*

The following AT&T facilities were permanently abandoned and still attached to the pole (not removed):

- Untagged pole located 1 pole east of Pole 1335003E: there were three abandoned service drops.
- Pole 270687E: an AT&T riser was abandoned.
- Pole 1357198E: a service drop was abandoned.
- Pole 1357197E: a service drop was abandoned.
- Pole 1357195E: a service drop was abandoned.

**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 evidence abrasions 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).*

The following AT&T facilities were strained by vegetation and their condition was not corrected:

- Pole 733601E: the conductor span was entangled in vegetation, causing the conductor to be deflected.
- Pole 1498554E: a service drop was strained and deflected by vegetation.

**GO 95, Rule 37 – Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Column B, Case 5** requires the minimum clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” above ground in areas accessible to pedestrians only to be 10 feet.

A service drop attached to Pole 733601E had approximately 7 feet clearance above the ground.

**GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8** requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

The following AT&T facilities had less than 12 inches of vertical clearance from third-party communications conductors:

- Pole X8173T: an AT&T conductor was in contact with a “snowshoe” on a third-party communications conductor.
- Pole 1060580H: at mid-span, an AT&T conductor was contacting a third-party communications conductor.
- Pole 680277H: an AT&T conductor had less than 12 inches of vertical clearance from a third-party communications conductor.

**GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 9** requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Supply Conductors Service Drops and Trolley Feeders”, 0-750 Drops” supported on the same pole to be 48 inches.

An AT&T service drop attached to Pole 733601E was contacting a supply service drop.

**GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 18** requires the minimum radial clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Guys passing conductors supported on other poles, or guys approximately parallel to conductors supported on the same poles” to be 3 inches.

An AT&T communications conductor attached to Pole 4431969E, was contacting a third-party down guy wire attached at the primary level .

**GO 95, Rule 37, Table 1, Column B, Case 10** requires the minimum radial centerline clearance of “communication conductors (including open wire, cables and service drops)” from “non-climbable street lighting” to be 12 inches.

An AT&T conductor attached on each of the following poles was contacting a street light post:

- Pole 704993H
- Pole 1498552E

**GO 95, Rule 84.6-B, 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...*

An AT&T ground moulding attached to Pole 1357197E was damaged, exposing the ground wire.

**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.*

An AT&T conductor span attached to Pole 414353E was obstructing the climbing space.

**GO 95, Rule 86.2, 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.*

An AT&T down guy wire attached on each of the following poles was not maintained taut:

- An untagged pole located near 215 West Washington Street
- Pole 1498555E
- Pole 733602E

**GO 95, Rule 91.3-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.*

On Pole 1357197E, The lowest pole step attached to Pole 1357197E was less than 8 feet from ground level.

**GO 128, Rule 42.7, Covers**, states in part:

*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.*

A below ground junction box associated with Pole 4458280E was not secure in a manner that requires a tool to gain access.

**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.*

Pedestal 1801 contained a ground wire that was not attached to grounding bracket.