

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 20, 2023

CA2022-943

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

SUBJECT: Audit of AT&T San Bernardino County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Stacey Ocampo and Monica Robledo of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's San Bernardino County District from November 14, 2022, to November 18, 2022. 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 February 20, 2023, 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 Stacey Ocampo at (213) 266-4712 or Stacey.Ocampo@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
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC
Stacey Ocampo, Utilities Engineer, 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 ID	Type of Structure	Location
1	4229756E	Pole	Colton
2	4131911E	Pole	Colton
3	4229755E	Pole	Colton
4	4229754E	Pole	Colton
5	4229753E	Pole	Colton
6	4300847E	Pole	Colton
7	4229752E	Pole	Colton
8	4131904E	Pole	Colton
9	4131903E	Pole	Colton
10	4242254E	Pole	Colton
11	4131901E	Pole	Colton
12	2254341E	Pole	Colton
13	2254342E	Pole	Colton
14	2254340E	Pole	Colton
15	2254339E	Pole	Colton
16	4960759E	Pole	Colton
17	716980H	Pole	Colton
18	Rear of 7470 Luane Trail	Pole	Colton
19	4960758E	Pole	Colton
20	7475 Luane Trail	Pole	Colton
21	7415 Luane Trail	Pole	Colton
22	2235622E	Pole	Colton
23	2203394E	Pole	Colton
24	Across 7285 Luane Trail	Pole	Colton
25	1339173E	Pole	East Highland
26	1339175E	Pole	East Highland
27	4707240E	Pole	Highland
28	103736H	Pole	Highland
29	103735H	Pole	Highland
30	103734H	Pole	Highland
31	7696 Peacock St	Pole	Highland
32	1491567E	Pole	Highland
33	1491566E	Pole	Highland
34	1049427H	Pole	Highland
35	4511050E	Pole	Highland
36	716974H	Pole	Highland
37	27226 Cypress St	Pole	Highland
38	1407465E	Pole	Highland
39	1407467E	Pole	Highland
40	1153016E	Pole	Rialto

41	2551 Montecito Dr	Pedestal	Rialto
42	2569 Montecito Dr	Pedestal	Rialto
43	2587 Montecito Dr	Pedestal	Rialto
44	2597 Montecito Dr	Pedestal	Rialto
45	2633 Montecito Dr	Pedestal	Rialto
46	2653 Montecito Dr	Pedestal	Rialto
47	3514 Amberwood Ave	Pedestal	Rialto
48	3498 Amberwood Ave	Pedestal	Rialto
49	3482 Amberwood Ave	Pedestal	Rialto
50	3466 Amberwood Ave	Pedestal	Rialto
51	3440 Amberwood Ave	Pedestal	Rialto
52	3422 Amberwood Ave	Pedestal	Rialto
53	2725 W Terra Vista Dr	Bbox	Rialto
54	2677 W Terra Vista Dr	VRAD	Rialto
55	2700 W Terra Vista Dr	Power Meter	Rialto
56	3738 Live Oak Ave	Pedestal	Rialto
57	7340 Whitewood Dr	Pedestal	Fontana
58	15620 Jackson Dr	Pedestal	Fontana
59	6908 Oleander Ave	Handhole	Fontana
60	Corner of Oleander Ave & Walnut St	Pull Thru Box	Fontana
61	16264 Soapberry Lane	Handhole	Fontana
62	16275 Soapberry Lane	Handhole	Fontana
63	16244 Soapberry Lane	Handhole	Fontana
64	16216 Soapberry Lane	Handhole	Fontana
65	Side of 6886 Crabtree Way	Junction Box	Fontana
66	Behind 16225 Soapberry Lane	Pedestal	Fontana
67	936 S Larch Ave	Pedestal	Rialto
68	Corner of Fontlee Lane & S Larch Ave	Pedestal	Rialto
69	1090 Fontlee Lane	Pedestal	Rialto
70	931 Teakwood Ave	Pedestal	Rialto
71	932 Teakwood Ave	Pedestal	Rialto
72	997 Teakwood Ave	Pedestal	Rialto
73	983 Orchard Lane	Pedestal	Colton
74	1830 Sugar Pine	Pedestal	Colton
75	1004 S Oak Leaf Dr	Pedestal	Colton
76	995 Oak Leaf Dr	Pedestal	Colton
77	119877E	Pole	San Bernardino
78	4359164E	Pole	San Bernardino
79	4331517E	Pole	San Bernardino
80	4479994E	Pole	San Bernardino
81	4710711E	Pole	San Bernardino
82	4470651E	Pole	San Bernardino
83	1346602E	Pole	San Bernardino
84	4632826E	Pole	San Bernardino
85	1329140E	Pole	San Bernardino

86	1329141E	Pole	San Bernardino
87	4505689E	Pole	San Bernardino
88	2267370E	Pole	San Bernardino
89	4438659E	Pole	San Bernardino
90	2267378E	Pole	San Bernardino
91	2267379E	Pole	San Bernardino
92	4402231E	Pole	San Bernardino
93	2267381E	Pole	San Bernardino
94	2267382E	Pole	San Bernardino
95	2267383E	Pole	San Bernardino
96	2267384E	Pole	San Bernardino
97	4930975E	Pole	San Bernardino
98	2267385E	Pole	San Bernardino
99	4930976E	Pole	San Bernardino
100	4530088E	Pole	San Bernardino
101	4530087E	Pole	San Bernardino
102	4530086E	Pole	San Bernardino
103	102995H	Pole	San Bernardino
104	4530085E	Pole	San Bernardino
105	4530084E	Pole	San Bernardino
106	4530083E	Pole	San Bernardino
107	4530082E	Pole	San Bernardino
108	1407460E	Pole	San Bernardino
109	4510355E	Pole	San Bernardino

III. Field Inspection – Violations List

My staff observed the following violations during the field inspections:

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:

- 4707240E: the AT&T lashing wire was broken.
- 2203394E: the AT&T service drop was not properly secured to the surface of the pole.
- 716980H: Incomplete pole transfer.
- Pole located at 7696 Peacock St: unsecured riser conduit.
- 2267385E: the AT&T communication span was attached to a third-party communication conductor via a rope.
- 4510355E: unsecured riser conduit.

The AT&T down guy anchor on each of the following poles was buried:

- 4131904E
- 1339173E
- Pole located on the side of 7696 Peacock Street
- 4359164E

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 wire attached to each of the following poles was not taut:

- 4242254E
- Rear of 7470 Luane Trail
- 4505689E

GO 95, Rule 31.6, Abandoned Lines, states in part:

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.

A permanently abandoned anchor guy was still attached to Pole 1407460E.

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, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.

The ground moulding attached to each of the following poles was damaged:

- 103736H
- 1407460E

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 service drop on pole 119877E was in contact with a third-party communications service drop.

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 pedestal at each of the following locations was damaged:

- The pedestal located at 2569 Montecito Dr
- The pedestal located at 7340 Whitewood Dr
- The pedestal located at 2597 Montecito Dr

The lock securing the pedestal cover at each of the following locations was inoperable or damaged:

- The pedestal located at 2633 Montecito Dr
- The pedestal located at 997 Teakwood Ave