

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 26, 2022

CA2022-944

Keith Scarzafava  
Catalina Broadband  
V.P. Operations - Engineering  
20015 SW Pacific Hwy, Suite 100  
Sherwood, OR 97140

**SUBJECT:** Audit of Catalina Broadband Solutions

Mr. Scarzafava:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), James Miller of my staff conducted a Communications Infrastructure Provider (CIP) audit of Catalina Broadband Solutions (CBS) from July 11, 2022, to July 15, 2022. The audit included a review of CBS's records and a field inspection of CBS's 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 September 26, 2022, by electronic or hard copy, of all corrective measures taken by CBS to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact James Miller at (213) 660-8898 or [James.Miller@cpuc.ca.gov](mailto: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:

- Completed and pending work orders
- Inspection records were not available

### II. Records Review – Violations List

**GO 95, Rule 44.2, Additional Construction**, states in part:

*Any entity planning the addition of facilities that materially increases loads on a structure shall perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors below the values specified by Rule 44.3.*

In February 2021, CBS installed a new fiber optic communications conductor along Metropole Avenue, supported by Pole No. 1492847E and Pole No. 1492848E, but did not perform a loading calculation to ensure that the addition of the facilities would not reduce the poles' safety factors below the values specified by Rule 44.3.

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

*Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.*

*The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities.*

GO 95, Rule 18-B requires communications companies to establish and implement an auditable maintenance and inspection program for its facilities and lines. CBS has no such auditable maintenance program.

Rule 18-B also requires the company to maintain records of inspections performed. CBS was unable to provide the CPUC with any records indicating that any inspections had been performed on its system in the five years preceding 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.*

CBS was unable to provide the CPUC with any records indicating that CBS had frequently or thoroughly inspected its overhead facilities in the five years preceding the audit.

**GO 95, Rule 80.1-A1, 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	1
Detailed	10	5

CBS was unable to provide the CPUC with records indicating that CBS had performed patrol or detailed inspections of its joint-use poles in the high fire-threat portions of CBS’s service area in compliance with the inspection cycles required by GO 95, Rule 80.1-A1.

**GO 128, Rule 17.2, Inspection**, states:

*Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules.*

CBS was unable to provide the CPUC with any records indicating that CBS had frequently or thoroughly inspected its underground facilities in the five years preceding the audit.

### III. Field Inspection

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

No.	Facility Identification	Facility Type	Location
1	2381629E	Pole	Avalon
2	2381630E	Pole	Avalon
3	X10141E	Pole	Avalon
4	2365067E	Pole	Avalon
5	1492837E	Pole	Avalon
6	1492838E	Pole	Avalon
7	1492840E	Pole	Avalon
8	2006380E	Pole	Avalon
9	1491738E	Pole	Avalon
10	2006380E	Pole	Avalon
11	1491738E	Pole	Avalon
12	4926588E	Pole	Avalon
13	1491732E	Pole	Avalon
14	1491729E	Pole	Avalon
15	1491731E	Pole	Avalon
16	4807604E	Pole	Avalon
17	X10119E	Pole	Avalon
18	1491857E	Pole	Avalon
19	2283645E	Pole	Avalon
20	1492390E	Pole	Avalon
21	1692457E	Pole	Avalon
22	1491854E	Pole	Avalon
23	1491803E	Pole	Avalon
24	1491804E	Pole	Avalon
25	232422E	Pole	Avalon
26	X10136E	Pole	Avalon
27	1492399E	Pole	Avalon
28	1492877E	Pole	Avalon
29	2276627E	Pole	Avalon
30	1492463E	Pole	Avalon
31	1492513E	Pole	Avalon
32	1492512E	Pole	Avalon
33	1492514E	Pole	Avalon
34	4267834E	Pole	Avalon
35	1492818E	Pole	Avalon
36	4034639E	Pole	Avalon
37	635 Pebbly Beach Rd.	Power Supply	Avalon
38	636 Pebbly Beach Rd.	Node	Avalon

39	439083H	Pole	Avalon
40	2092183E	Pole	Avalon
41	1491622E	Pole	Avalon
42	Tagless Pole North of 1491622E	Pole	Avalon
43	1492875E	Pole	Avalon
44	1060155H	Pole	Avalon
45	1492815E	Pole	Avalon
46	1492816E	Pole	Avalon
47	1492817E	Pole	Avalon
48	2319284E	Pole	Avalon
49	Tagless Pole North of 2319284E	Pole	Avalon
50	Next to Tagless Pole North of Pole No. 2319284E	Amplifier	Avalon
51	Tagless Pole Two Poles North of 2319284E	Pole	Avalon
52	2319283E	Pole	Avalon
53	Next to Pole No. 2319288E	Buddy Pole	Avalon
54	1009621H	Pole	Avalon
55	6 Handholes North of Pole No. 1009621H	Handhole	Avalon
56	Vault North of Pole No. 1009621H	Vault	Avalon
57	1491703E	Pole	Avalon
58	1492851E	Pole	Avalon
59	1492373E	Pole	Avalon
60	Next to Pole No. 1491719E	Buddy Pole	Avalon
61	1491699E	Pole	Avalon
62	4152655E	Pole	Avalon
63	727663H	Pole	Avalon
64	727664H	Pole	Avalon
65	727662H	Pole	Avalon
66	2092181E	Pole	Avalon
67	1491716E	Pole	Avalon
68	2244383E	Pole	Avalon
69	3244225E	Pole	Avalon
70	1492336E	Pole	Avalon
71	1492459E	Pole	Avalon
72	1492376E	Pole	Avalon
73	2167576E	Pole	Avalon
74	2167575E	Pole	Avalon
75	Next to Pole No. 1491709E	Buddy Pole	Avalon
76	3365060E	Pole	Avalon
77	2365061E	Pole	Avalon
78	2365062E	Pole	Avalon
79	2365063E	Pole	Avalon

80	2365064E	Pole	Avalon
81	2365065E	Pole	Avalon
82	2365066E	Pole	Avalon
83	Pole East of Pole No. 2365066E	Pole	Avalon
84	504459H	Pole	Avalon
85	4659466E	Pole	Avalon
86	X10128E	Pole	Avalon
87	4659465E	Pole	Avalon
88	1492874E	Pole	Avalon
89	39670	Pole	Avalon
90	39669	Pole	Avalon
91	4926589E	Pole	Avalon
92	1492878E	Pole	Avalon
93	2324159E	Pole	Avalon
94	4683256E	Pole	Avalon
95	1492308E	Pole	Avalon
96	1492309E	Pole	Avalon
97	1492310E	Pole	Avalon
98	2167594E	Pole	Avalon
99	2167665E	Pole	Avalon
100	4296701E	Pole	Avalon
101	1492394E	Pole	Avalon
102	1492395E	Pole	Avalon
103	1491799E	Pole	Avalon
104	2283517E	Pole	Avalon
105	32 Canyon Terrace Rd.	Handhole	Avalon
106	93 E Canyon Terrace Rd.	Doghouse	Avalon
107	34 Canyon Terrace Rd.	Handhole	Avalon
108	38 Canyon Terrace Rd.	Handhole	Avalon
109	80 Canyon Terrace Rd.	Handhole	Avalon
110	78 Canyon Terrace Rd.	Doghouse	Avalon
111	71 Canyon Terrace Rd.	Handhole	Avalon
112	1491697E	Pole	Avalon
113	Next to Pole No. 1491697E	Pedestal	
114	66 Canyon Terrace Rd.	Doghouse	Avalon
115	60 Canyon Terrace Rd.	Handhole	Avalon
116	62 Canyon Terrace Rd.	Handhole	Avalon
117	56 Canyon Terrace Rd.	Handhole	Avalon
118	55 Canyon Terrace Rd.	Handhole	Avalon
119	A1 Wrigley Rd.	Doghouse	Avalon
120	1492536E	Pole	Avalon
121	2006395E	Pole	Avalon
122	1492447E	Pole	Avalon

123	2006389E	Pole	Avalon
124	402 Avalon Canyon Rd.	Doghouse	Avalon
125	402 Avalon Canyon Rd.	Power Supply	
126	Falls Canyon Rd. & Avalon Canyon Rd.	Doghouse	Avalon
127	Avalon High School on Falls Canyon Rd.	Doghouse	Avalon
128	Horse Stable on Avalon Canyon Rd.	Doghouse	Avalon
129	Bird Park Canyon Rd. & Avalon Canyon Rd.	Doghouse	Avalon
130	Bird Park Apartments	Doghouse	Avalon
131	Trianna Apartments	Doghouse	Avalon
132	Trianna Apartments	Doghouse	Avalon
133	Between Bird Park and Virggies Restaurant	Handhole	Avalon
134	Sheriff's Housing on Avalon Canyon Rd.	Handhole	Avalon
135	945 Avalon Canyon Rd.	Pedestal	Avalon
136	Nature Center on Avalon Canyon Rd.	Doghouse	Avalon
137	Outside Wrigley Memorial on Avalon Canyon Rd.	Doghouse	Avalon
138	2 Cabrillo Dr.	Pedestal	Avalon
139	16 Cabrillo Dr.	Doghouse	Avalon
140	30 Cabrillo Dr.	Pedestal	Avalon
141	38 Cabrillo Dr.	Doghouse	Avalon
142	48 Cabrillo Dr.	Doghouse	Avalon
143	52 Cabrillo Dr.	Pedestal	Avalon
144	217 Metropole Ave.	Vault	Avalon
145	1492847E	Pole	Avalon
146	1492848E	Pole	Avalon
147	1492849E	Pole	Avalon
148	X10113E	Pole	Avalon
149	Crescent Ave. & Marilla Ave.	Handhole	Avalon
150	100 Crescent Ave.	Vault	Avalon
151	Between Yacht Club & Casino on Crescent Ave.	Handhole	Avalon
152	South of Casino on Crescent Ave.	Vault	Avalon
153	1 Casino Way	Doghouse	Avalon
154	1 Casino Way	Handhole	Avalon
155	Descanso Kitchen	Vault	Avalon
156	Descanso House	Handhole	Avalon
157	Building 1 in Hamilton Cove	Doghouse	Avalon
158	Between Buildings 1 & 2 in Hamilton Cove	Vault	Avalon
159	Building 3 in Hamilton Cove	Vault	Avalon
160	Camino de Flores and Playa Azul	Doghouse	Avalon

161	Building 6 in Hamilton Cove	Vault	Avalon
162	Building 9 in Hamilton Cove	Doghouse	Avalon
163	Building 13 in Hamilton Cove	Doghouse	Avalon
164	Building 10 in Hamilton Cove	Vault	Avalon

#### IV. Field Inspection - Violations List

My staff observed the following violations during the field inspections portion of the audit:

##### **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 overhead CBS facilities were abandoned and no longer in use:

- Service drops on Pole No. 2381630 and Pole No. 439083H
- A test wire on Pole No. 1492336E

##### **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 “No Fireworks” sign was attached to the buddy pole next to Pole No. 2319288E.
- An unauthorized construction permit from The City of Avalon was attached to Pole No. 1491716E.

**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),” and “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

CBS communications conductors had less than 12 inches of vertical clearance from third-party communications conductors on or near each of the following poles:

- |            |            |            |
|------------|------------|------------|
| • 2381630E | • 1492877E | • 1491719E |
| • 1492840E | • 1492513E | • 727664H  |
| • 2006380E | • 1492512E | • 1491716E |
| • 4926588E | • 1492514E | • 2244383E |
| • 1491732E | • 439083H  | • 1492336E |
| • 1491731E | • 1491622E | • 2167575E |
| • 1491857E | • 1060155H | • 1491709E |
| • 1492390E | • 1492815E | • 2365061E |
| • 1492399E | • 1492851E | • 2365062E |

- 2365063E
- 2365064E
- 2365065E
- 2365066E
- 1493874E
- 4926589E
- 1492878E
- 1492308E
- 1492309E
- 1492310E
- 2167594E
- 4296701E
- 1492394E
- 1492395E
- 1491799E
- 2283517E
- 1492847E
- 1492848E
- 1492849E
- X10113

**GO 95, Rule 86.9, Guy Marker (Guy Guard),** states:

*A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.*

Outermost anchor guys on each of the following poles lacked suitable markers or guy guards:

- 2244225E
- 4683256E

**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...*

- The ground wire on Pole No. 1492336E had no covering.

The ground moulding on each of the following poles was damaged:

- 1491830E
- 1492874E

**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.*

A CBS down guy wire attached to Pole No. 4034639E was not taut.

**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.*

A pole step on each of the following poles was less than 8 feet from the ground:

- 1492837E
- 2092183E
- 39669
- 39670
- 2324159E
- 1492395E

**GO 95, Rule 56.4, Clearances**, states in part:

*The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall not be less than as specified in Table 2, Case 19.*

Table 2, Column C, Case 19 requires guy wires and communications conductors supported on the same pole to maintain a radial clearance of three inches.

- A CBS down guy and a third-party communications conductor, both supported on Pole No. 4034639E, were in contact.

**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).*

The Messenger wire was not grounded at each of the following deadend poles:

- 4683256E
- 2167594E
- 1491697E

**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.*

A CBS service drop supported on Pole No. 727664H had approximately 5 feet of clearance above a residential patio floor.

**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 following above-ground enclosures were not secured against entry by unauthorized persons by means of locks or other suitable means:

- The amplifier near the tagless pole south of Pole No. 2319284E
- The doghouse at 93 Canyon Terrace Road
- The doghouse at 78 Canyon Terrace Road
- The doghouse at 66 Canyon Terrace Road
- The pedestal next to Pole No. 1491697E
- The doghouse at A1 Wrigley Road
- The doghouse at 402 Avalon Canyon Road
- The doghouse at Falls Canyon Road and Avalon Canyon Road
- The doghouse outside Avalon High School on Falls Canyon Road
- The doghouse outside the stable on Avalon Canyon Road
- The doghouse on Bird Park Canyon Road and Avalon Canyon Road
- The doghouse outside Bird Park Apartments
- The two doghouses outside Trianna Apartments
- The pedestal at 945 Avalon Canyon Road
- The doghouse outside The Nature Center on Avalon Canyon Road
- The doghouse outside The Wrigley Memorial on Avalon Canyon Road
- The pedestal at 2 Cabrillo Drive
- The doghouse at 16 Cabrillo Drive
- The pedestal at 30 Cabrillo Drive
- The doghouse at 38 Cabrillo Drive
- The doghouse at 48 Cabrillo Drive
- The pedestal at 52 Cabrillo Drive
- The doghouse at 1 Casino Way
- The doghouse outside Building 1 in Hamilton Cove
- The doghouse at Camino de Flores and Playa Azul
- The doghouse outside Building 9 in Hamilton Cove
- The doghouse outside Building 13 in Hamilton Cove

**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.*

The following vaults and handholes had lids which could be opened without the use of tools or appliances:

- The six handholes and the vault along Wrigley Road north of Pebbly Beach Power Station.
- The handhole at 32 Canyon Terrace Road
- The handhole at 34 Canyon Terrace Road
- The handhole at 38 Canyon Terrace Road
- The handhole at 80 Canyon Terrace Road
- The handhole at 71 Canyon Terrace Road
- The handhole at 60 Canyon Terrace Road
- The handhole at 62 Canyon Terrace Road
- The handhole at 56 Canyon Terrace Road
- The handhole at 55 Canyon Terrace Road
- The handhole between Bird Park and Virggies Restaurant on Avalon Canyon Road
- The handhole outside The Sheriff's Department housing on Avalon Canyon Road
- The vault at 217 Metropole Avenue
- The handhole at Crescent Avenue and Marilla Avenue
- The vault at 100 Crescent Avenue
- The handhole between the Yacht Club and Casino on Crescent Avenue
- The vault south of the Casino on Crescent Avenue
- The handhole at 1 Casino Way
- The handhole outside Descanso House
- The vault between Buildings 1 and 2 in Hamilton Cove
- The vault outside Building 3 in Hamilton Cove
- The vault outside Building 6 in Hamilton Cove
- The vault outside Building 10 in Hamilton Cove

**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.*

- A doghouse enclosure on Bird Park Canyon Road and Avalon Canyon Road had a large crack in its casing.
- A handhole between Bird Park and Virggies Restaurant had its lid off and was completely filled with leaves, twigs, and dirt.
- The vault at 217 Metropole Avenue had a broken case.

Batteries in power supplies at the following locations had corrosion on their cathodes:

- 635 Pebbly Beach Road
- 402 Avalon Canyon Road

**GO 128, Rule 36.5, Grounding and Bonding of Conductors and Equipment**, states in part:

*A. General Supply conductors and equipment of the following types shall be bonded in manholes and at other locations where conductors and equipment are accessible and in proximity to one another, and shall be grounded in accordance with Rule 36.5–C.*

...

*(5) Metal Cases Supply Equipment: Metal cases of transformers, switches, and other supply equipment.*

The following supply equipment was not grounded:

- The node at 635 Pebbly Beach Road
- The amplifier in the doghouse at 93 Canyon Terrace Road
- The amplifier in the doghouse at 66 Canyon Terrace Road
- The amplifier in the doghouse outside Avalon High School on Falls Canyon Road
- The amplifier in the doghouse outside the stable on Avalon Canyon Road
- The amplifier in the doghouse on Bird Park Canyon Road and Avalon Canyon Road
- The amplifier in the pedestal at 945 Avalon Canyon Road
- The amplifier in the doghouse outside The Nature Center on Avalon Canyon Road
- The amplifier in the doghouse outside The Wrigley Memorial on Avalon Canyon Road
- The amplifier in the doghouse at 16 Cabrillo Drive
- The amplifier in the doghouse at 48 Cabrillo Drive
- The amplifier in the doghouse outside Building 1 in Hamilton Cove
- The amplifier in the doghouse outside Building 9 in Hamilton Cove
- An amplifier in the second handhole north of Pebbly Beach Power Station on Wrigley Road
- An amplifier in the vault north of Pebbly Beach Power Station on Wrigley Road
- The amplifier in the vault outside Descanso Kitchen
- The amplifier in the handhole outside Descanso House
- The amplifier in the vault outside Building 10 in Hamilton Cove