

November 27, 2023

Via Electronic Mail

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

Re: Audit of Verizon Communications' (Verizon) Ventura County Area

Dear Mr. Daye:

This responds to the staff's Audit Report of Verizon facilities in Ventura County. As discussed below, we are working on remediating deviations found as to Verizon's facilities, and issued third party notices where it was appropriate.

Further details are set forth below.

I. Field Inspection – Violations List

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

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.

Verizon's facilities on the following poles required maintenance:

- Pole 728639E – A Verizon lashing wire was broken.
- Pole West of 926680E – The pole was missing a structure identification tag.
- Pole 4953156E – The “eye” of the shared Verizon down guy anchor attached to the pole was buried.

- Pole 473600E – The “eye” of the Verizon down guy anchor attached to the pole was buried.
- Pole GT126393 – A Verizon down guy wire attached to the pole was broken.
- Pole 4400239E – A Verizon crossarm was damaged.
- Pole 4400290E – A “buddy pole” was not yet removed and left approximately a foot away from the pole.
- Pole 792815E – A “buddy pole” was not yet removed and left approximately a foot away from the pole.
- Pole 792816E – A Verizon lashing wire was broken.
- Pole 792820E – A Verizon lashing wire was broken.

Verizon Response: Verizon is working to remediate the deviations found above. Verizon has completed remediation for the following poles:

- Pole 728639E – A Verizon lashing wire was broken. -- *construction was completed on 8/7/2023.*
- Pole 792816E – A Verizon lashing wire was broken –*construction was completed 10/27/2023*
- Pole 792820E – A Verizon lashing wire was broken –*construction was completed 8/7/2023*

We have sent third party notices to other attachers or owners for the following poles:

- Pole 4953156E – The “eye” of the shared Verizon down guy anchor attached to the pole was buried. *Third party notification was sent on 7/14/2023 to AT&T .*
- Pole 4400290E – A “buddy pole” was not yet removed and left approximately a foot away from the pole . *Verizon notes that responsibility to remove “buddy poles” are the pole owner’s, and not attachers. Verizon sent a third party notification to Frontier on 7/14/2023*
- Pole 792815E – A “buddy pole” was not yet removed and left approximately a foot away from the pole. *Verizon notes that responsibility to remove “buddy poles” are the pole owner’s, and not attachers. Verizon sent a third party notification on 7/14/2023 to Frontier and SCE.*

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 evidences abrasion 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 Verizon communications cable supported on Pole 88865E was strained by vegetation.

Verizon Response: Verizon is currently working to remediate this deviation.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Case 8, Column C requires the minimum vertical separation between communications conductors on separate crossarms or other supports at different levels on the same pole and in adjoining midspans to be 12 inches.

The separation between a Verizon communications conductor and a third-party communications conductor on each of the following poles had less than 12 inches of vertical separation:

- Pole 4784560 E – Verizon’s conductor was touching another communication conductor.
- Pole 926680 E – Verizon’s conductor was touching another communication conductor.
- Pole 1576771E – Verizon’s conductor was touching another communication conductor.
- Pole 425634 1E – Verizon’s conductor was touching another communication conductor.
- Pole 1278909 E – Verizon’s conductor had less than 12 inches of vertical separation from another communication conductor.
- Pole 19560 15E – Verizon’s conductor was touching another communication conductor.
- Pole 1444009 E – Verizon’s conductor was touching another communication conductor.
- Pole 4743265E – Verizon’s conductor was touching another communication conductor.
- Pole 4400239E – Verizon’s conductor was touching another communication conductor.
- Pole 4239895E – Verizon’s conductor was touching another communication conductor.
- Pole 792821E – Verizon’s conductor was touching another communication conductor.
- Pole 792823E – Verizon’s conductor was touching another communication conductor.
- Pole 80563 1E – Verizon’s conductor was touching another communication conductor.

Verizon Response: Verizon is in the process of completing remediations to the identified deviations above, and has completed remediations for the following poles:

- Pole 792821E – Verizon’s conductor was touching another communication conductor – ***Verizon completed remediations on 8/7/2023***
- Pole 792823E – Verizon’s conductor was touching another communication conductor. ***Verizon completed remediations on 8/7/2023***

Verizon also sent third party notifications to providers regarding the following issues, as the conductor was not Verizon’s.

- Pole 1576771E – Verizon’s conductor was touching another communication conductor – ***Third party notification sent on 7/14/2023 to TWN***
- Pole 4256341E – Verizon’s conductor was touching another communication conductor - ***Third party notification sent on 7/14/2023 to CC***
- Pole 805631E – Verizon’s conductor was touching another communication conductor - ***Third party notification sent on 11/16/23 to NG***

GO 95, Rule 54.6 -B, Ground Wires , states in part:

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground moulding attached to Pole 1755645E was damaged.

Verizon Response: Verizon is working to remediate this issue. We have also sent a third party notification on 7/14/2023 to SCE.

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, Use, 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.

The Verizon down guy wire supporting Pole 2151699E was not taut.

Verizon Response: Verizon is working to complete remediation.