

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 19, 2024

CA2023-1033

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

SUBJECT: Audit of AT&T Los Angeles Region Ventura County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Mily Vaidya of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's Los Angeles Region Ventura County District from June 19-23, 2023. 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 December 20, 2024, by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, please contact Mily Vaidya at 213-999-8528 or Mily.Vaidya@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
Mily Vaidya, 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 order.
- Pole loading calculations
- 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	1443837E	Pole	Simi Valley
2	1443836E	Pole	Simi Valley
3	1332722E	Pole	Simi Valley
4	4730407E	Pole	Simi Valley
5	2241232E	Pole	Simi Valley
6	F4901	Pedestal	Simi Valley
7	In front of house 2762	Pedestal	Golf Meadows Court, Simi Valley
8	In front of house 2725	Pedestal	Simi Valley
9	1713040E	Pole	Simi Valley
10	1332863E	Pole	Simi Valley
11	4436977E	Pole	Simi Valley
12	1443873E	Pole	Simi Valley
13	1376753E	Pole	Simi Valley
14	4557561E	Pole	Simi Valley
15	1376751E	Pole	Simi Valley
16	4560692E	Pole	Simi Valley
17	1365171E	Pole	Simi Valley
18	1365169E	Pole	Simi Valley
19	F3002	Pedestal	Simi Valley
20	859878E	Pole	Simi Valley
21	4827682E	Pole	Simi Valley
22	741191H	Pole	Simi Valley
23	4473427E	Pole	Simi Valley
24	4827683E	Pole	Simi Valley
25	793222E	Pole	Simi Valley
26	644790E	Pole	Simi Valley
27	4860070E	Pole	Simi Valley
28	2016101E	Pole	Simi Valley
29	4946830E	Pole	Simi Valley
30	1166602E	Pole	Simi Valley
31	1281187E	Pole	Simi Valley
32	1089851E	Pole	Simi Valley
33	4572625E	Pole	Simi Valley
34	2235130E	Pole	Simi Valley
35	1281188E	Pole	Simi Valley
36	4635120E	Pole	Simi Valley
37	4521274E	Pole	Simi Valley
38	4521273E	Pole	Simi Valley
39	4300237E	Pole	Simi Valley
40	4630653E	Pole	Simi Valley
41	4784329E	Pole	Simi Valley

42	4784330E	Pole	Simi Valley
43	1359562E	Pole	Simi Valley
44	1359563E	Pole	Simi Valley
45	661396H	Pole	Simi Valley
46	661397H	Pole	Simi Valley
47	X14780E	Pole	Simi Valley
48	X14771E	Pole	Simi Valley
49	In front of	Handhole	921 Waterbury Ln
50	In front of	Handhole	924 Waterbury Ln
51	In front of	Handhole	964 Waterbury Ln
52	In front of	Handhole	945 Waterbury Ln
53	In front of	Pedestal	986 Waterbury Ln
54	In front of	Handhole	959 Waterbury Ln
55	In front of	Handhole	1011 Waterbury Ln
56	In front of	Handhole	1027 Waterbury Ln
57	In front of	Pedestal	2078 Pier Point Blvd
58	In front of	Handhole	2090 Pier Point Blvd
59	In front of	Handhole	Brockton Ln
60	In front of	Handhole	940 Brockton Ln
61	In front of	Pedestal	1059 Tuttle Ave, Simi Valley
62	In front of	Pedestal	1045 Tuttle Ave
63	In front of	Pedestal	641 Tuttle Ave
64	In front of	Pedestal	1003 Tuttle Ave
65	In front of	Pedestal	957 Tuttle Ave
66	In front of	Pedestal	933 Tuttle Ave
67	In front of	Pedestal	686 Tuttle Ave & Harper St
68	In front of	Handhole	743 Harper St
69	In front of	Handhole	795 Harper St
70	In front of	Pedestal	846 Harper St
71	In front of	Pedestal	847 Harper St
72	In front of	Pedestal	952 Etn Ave, Simi Valley
73	In front of	Handhole	887 Weaver St, Simi Valley
74	In front of	Handhole	696 Weaver St, Simi Valley
75	In front of	Handhole	673 Weaver St, Simi Valley
76	1096174E	Pole	Simi Valley
77	1096175E	Pole	Simi Valley
78	1096176E	Pole	Simi Valley
79	1096177E	Pole	Simi Valley
80	1096178E	Pole	Simi Valley
81	1096179E	Pole	Simi Valley
82	1096180E	Pole	Simi Valley
83	1096182E	Pole	Simi Valley
84	777827H	Pole	Simi Valley
85	1096172E	Pole	Simi Valley
86	1096171E	Pole	Simi Valley
87	1096170E	Pole	Simi Valley

88	1096169E	Pole	Simi Valley
89	1096168E	Pole	Simi Valley
90	1096167E	Pole	Simi Valley
91	1096166E	Pole	Simi Valley
92	1096165E	Pole	Simi Valley
93	4962347E	Pole	Simi Valley
94	4962347E	Pole	Simi Valley
95	1515148E	Pole	Simi Valley
96	Next to Pole 1515148E	Manhole	Simi Valley
97	1376449E	Pole	Simi Valley
98	1376448E	Pole	Simi Valley
99	1376447E	Pole	Simi Valley
100	1376446E	Pole	Simi Valley

III. Field Inspection – Violations List

We 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.

AT&T's facilities on the following poles required maintenance:

- Pole 1332722E: a lashing wire was damaged.
- Pole 4730407E: a lashing wire was damaged.
- Pole 661396H: a pole step was obstructed by wood.

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.

AT&T's service drops on the following poles were permanently abandoned and not removed:

- Pole 1365169E
- Pole 1096176E

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 on the same pole to be twelve inches.

- Pole 4436977E: an AT&T service drop was touching a third-party service drop.
- Pole 1443873E: an AT&T service drop was touching a third-party conductor.
- Pole 1376753E: an AT&T service drop was touching a third-party conductor.
- Pole 1376751E: an AT&T conductor has less clearance with a third-party conductor possibly due to being strained by vegetation.
- Pole 4827683E: an AT&T conductor was touching a third-party conductor.
- Pole 1096168E: an AT&T conductor was touching a third-party conductor.
- Pole 1096165E: an AT&T conductor was touching a third-party conductor.

GO 95, Rule 38, Table 2, Column C, Case 19 requires guy wires and service drops attached to the same pole to maintain a clearance of three inches.

An AT&T service drop supported on Pole 1096182E was touching a down guy wire.

GO 95, Rule 86.2, 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.

An AT&T down guy wire supporting Pole number 1166602E 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.

The lowest pole step attached to Pole number 1376449E was less than 7 feet above the ground.

GO 128, Rule 32.7, Covers, states in part:

Manholes, handholes, and subsurface equipment enclosures 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 arrangements shall be such that a tool or appliance shall be required for their opening and cover removal.

The following AT&T handholes had damaged covers:

- AT&T handhole near the front of 945 Waterbury Ln. has a cracked cover.
- AT&T handhole near the front of 1011 Waterbury Ln. has a corroded cover.
- AT&T handhole near the front of 940 Brockton Ln. has a corroded cover.
- AT&T handhole near the front of 847 Harper St. has a damaged cover.