

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 23, 2024

CA2023-1101

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

SUBJECT: Audit of AT&T Los Angeles (LA) Construction Avalon Area

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujiiye of my staff conducted a Communication Infrastructure Provider audit of AT&T LA Construction Avalon Area from November 13, 2023 to November 15, 2023. The audit included a review of AT&T LA Construction Avalon Area inspection and maintenance records and a field inspection of AT&T LA Construction Avalon Area facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). An itemized copy of the audit findings of violations identified by staff is enclosed along with this letter. Please advise me no later than February 23, 2024, by electronic or hard copy, of all corrective measures taken by AT&T to remediate 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 Eric Ujiiye at (213) 620-2598 or 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, ESRB, SED, 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.

From 2017 to 2023, AT&T completed 11 detailed inspections and 22 patrol inspections in a Tier 3 High Fire Threat Area after AT&T's required due dates.

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, Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

From 2017 to 2023, AT&T failed to complete 5 work orders by AT&T's scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID	Structure Type	Location
1	341 Camino Del Monte	Hand Hole	Avalon
2	4926590E	Pole	Avalon
3	4926591E	Pole	Avalon
4	4692572E	Pole	Avalon
5	2166718E	Pole	Avalon
6	1491854E	Pole	Avalon
7	1492457E	Pole	Avalon
8	1492390E	Pole	Avalon
9	2283645E	Pole	Avalon
10	1491857E	Pole	Avalon
11	1492387E	Pole	Avalon
12	1492857E	Pole	Avalon
13	2364876E	Pole	Avalon
14	2276672E	Pole	Avalon
15	X10805E	Pole	Avalon
16	X10142E	Pole	Avalon
17	X10111E	Pole	Avalon
18	X10251E	Pole	Avalon
19	X8606E	Pole	Avalon
20	Last 3 numbers 395E	Pole	Avalon
21	27 Newport - Avalon	Pad Mount Hub	Avalon
22	Side of 16 Canyon Terrance	Pedestal	Avalon
23	Side of 13 Canyon Terrance	Pedestal	Avalon
24	Side of 21 Canyon Terrance	Pedestal	Avalon
25	1549038H	Pole	Reservoir Summit
26	1047182H	Pole	Reservoir Summit
27	1047181H	Pole	Reservoir Summit
28	1047179H	Pole	Reservoir Summit
29	1047177H	Pole	Reservoir Summit
30	1047176H	Pole	Reservoir Summit
31	1047175H	Pole	Reservoir Summit
32	1047174H	Pole	Reservoir Summit
33	1492847E	Pole	Avalon
34	X8634E	Pole	Avalon
35	1492846E	Pole	Avalon

36	2283517E	Pole	Avalon
37	X10136E	Pole	Avalon
38	1492399E	Pole	Avalon
39	1492877E	Pole	Avalon
40	2276627E	Pole	Avalon
41	816475H	Pole	Avalon
42	X10128E	Pole	Avalon
43	4659466E	Pole	Avalon
44	504459E	Pole	Avalon
45	4659465E	Pedestal	Avalon
46	1492874E	Pedestal	Avalon
47	39670	Pedestal	Avalon
48	39669	Pedestal	Avalon
49	4926589E	Cabinet	Avalon
50	1492878E	Handhole	Avalon
51	2365060E	Pedestal	Avalon
52	2365061E	Pedestal	Avalon
53	2365062E	Pedestal	Avalon
54	2365063E	Pedestal	Avalon
55	2365064E	Pedestal	Avalon
56	2365065E	Pedestal	Avalon
57	2635066E	Pedestal	Avalon
58	4944845E	Pole	Avalon
59	X10141E	Pole	Avalon
60	2381630E	Pole	Avalon
61	2381629E	Pole	Avalon
62	2381633E	Pole	Avalon
63	30 Saint Catherine Way	Vault	Avalon
64	1 Casino Way	Pedestal	Avalon
65	1 Casino Way	Vault	Avalon

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:

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 2365064E: an SCE supply service drop, passing above an AT&T span conductor, had a clearance of 12 inches from the AT&T conductor, which is less than the minimum required clearance of 48 inches.
- Pole 2381633E: an SCE supply service drop, passing beneath an AT&T span conductor, had a clearance of 12 inches from the AT&T conductor, which is less than the minimum required clearance of 48 inches.

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.

An AT&T conductor attached to Pole number X10251E is not properly secured onto the messenger wire due to damaged attachment straps.

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.

The following AT&T facilities were permanently abandoned and should be removed:

- Pole 2166718E: an abandoned service drop that was bundled and attached to a chain link fence near the base of the pole.
- Pole 2365060E: there were two abandoned service drops attached at mid-span.
- Pole 2365063E: there was one abandoned service drop attached at mid-span.
- Pole 2381633E: an abandoned service drop that was bundled and attached to a pole step.

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 a communications conductor supported on the same pole:

- Pole 4926590E: an AT&T service drop was attached to a third-party communications service drop near the home located on the property.
- Pole 49265991E: near the pole, an AT&T conductor was touching multiple third-party communications conductors.
- Pole 1491857E: an AT&T conductor was attached at the same level and touching a third-party communications conductor.
- Pole 1492387E: an AT&T conductor, supported on a crossarm, was touching a third-party communications conductor supported on the same crossarm.
- Pole 1492874E: an AT&T service drop was touching a third-party communications service drop.
- Pole X10805E: two AT&T service drops were attached to an overbuilt third-party communications conductor.

GO 95, Rule 84.8-D4: Clearances Between Conductors – Above or below Supply Service Drops, states in part:

The radial clearance between communication service drop conductors and supply service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.

An AT&T service drop, attached to Pole number 4926590E, was touching a supply service drop weather head and had less than 12 inches of radial clearance from the supply service drop.

GO 95, Rule 84.6-F, Protective covering, states in part:

Protective covering shall be attached to poles, crossarms and structures by means of corrosion-resistant straps, lags or staples which are adequate to maintain such covering in a fixed position. Where such covering consists of hardwood or rigid plastic moulding, the distance between straps, lags or staples shall not exceed three feet on each side ...

An AT&T conduit riser installed on the surface of Pole number 1492390E was not secured, (attached at the communication level with one bracket at the top of the riser).