

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 1, 2024

CA2023-1163

Lisa Ludovici  
Charter Communications  
Director, Government Affairs – Central and Northern California  
270 Bridge Street  
San Luis Obispo, CA 93401

**SUBJECT:** Audit of Charter Communications' ("Spectrum") Morgan Hill Area

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Matthew Yunge and Nora Nguyen of my staff conducted a Communication Infrastructure Provider (CIP) audit of Charter Communications' assets in the Morgan Hill area from November 27, 2023 to December 1, 2023. The audit included a review of Charter Communications' inspection and maintenance records and field inspections of Charter Communications' 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. In addition, please respond no later than March 1, 2024, by electronic copy of all corrective actions and preventive measures taken by Charter Communications to correct the identified violations and prevent the recurrence of 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 provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Matthew Yunge at (415) 603-9828 or [Matthew.Yunge@cpuc.ca.gov](mailto:Matthew.Yunge@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

Rickey Tse, 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 (SED), CPUC  
Nika Kjensli, Program Manager, ESRB, SED, CPUC  
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC  
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC  
Matthew Yunge, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC  
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC  
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC

**AUDIT FINDINGS**  
**AUDIT OF CHARTER COMMUNICATIONS’ (“SPECTRUM”) MORGAN HILL**  
**NOVEMBER 27, 2023 to DECEMBER 1, 2023**

**I. Records Review**

During the audit, my staff reviewed the following records:

- Overhead and underground patrol and detailed inspections records
- Completed and pending corrective action work orders
- Pole loading calculations
- Charter Communications’ Overhead Lines Maintenance Plan
- Charter Communications’ Visual Inspections of Overhead Lines

**II. Records Review – Violations List**

My staff observed the following violations during the records review portion of the audit:

**General Order (GO) 95, Rule 31.1, Design, Construction and Maintenance**, states in part:

*For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.*

**GO 95, Rule 18-A1: 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.*

Charter Communications’ records indicated that from 2021 to 2023, Charter Communications completed 82 work orders for overhead assets past Charter Communications’ due date for corrective action.

Charter Communications’ records indicated that from 2021 to 2023, Charter Communications completed three work orders for underground assets past Charter Communications’ due date for corrective action.

### III. Field Inspection

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

Location #	Date/Time Visited	GPS Coordinates
1	2023-11-27 13:06:40	Point (-121.53239423 37.02410797)
2	2023-11-27 13:16:50	Point (-121.53233976 37.02232185)
3	2023-11-27 13:24:09	Point (-121.5329255 37.02344896)
4	2023-11-27 13:30:28	Point (-121.53264272 37.02186922)
5	2023-11-27 13:40:24	Point (-121.53351401 37.02327598)
6	2023-11-27 13:57:13	Point (-121.52778264 37.02715194)
7	2023-11-27 14:06:01	Point (-121.52833229 37.02763806)
8	2023-11-27 14:26:13	Point (-121.58312018 37.02386987)
9	2023-11-27 14:29:45	Point (-121.583123 37.02366292)
10	2023-11-27 14:33:05	Point (-121.58294294 37.02386557)
11	2023-11-27 14:37:27	Point (-121.58316371 37.02395369)
12	2023-11-27 14:42:53	Point (-121.5838898 37.02394696)
13	2023-11-27 14:45:20	Point (-121.58395585 37.02413402)
14	2023-11-27 14:49:17	Point (-121.5844806 37.02454793)
15	2023-11-27 14:53:31	Point (-121.58487438 37.02448708)
16	2023-11-27 14:56:50	Point (-121.58463459 37.02436633)
17	2023-11-27 14:59:25	Point (-121.58375454 37.02466105)
18	2023-11-27 15:20:16	Point (-121.56579422 36.992863)
19	2023-11-27 15:23:24	Point (-121.56588093 36.99251401)
20	2023-11-27 15:25:48	Point (-121.56582096 36.99234637)
21	2023-11-27 15:28:13	Point (-121.56578088 36.99210879)
22	2023-11-27 15:34:07	Point (-121.5654375 36.99356982)
23	2023-11-27 15:36:04	Point (-121.56499684 36.9935725)
24	2023-11-27 15:40:23	Point (-121.56452072 36.9935796)
25	2023-11-27 15:42:18	Point (-121.56416745 36.99362795)
26	2023-11-28 08:18:15	Point (-121.93236853 36.50494555)
27	2023-11-28 08:25:46	Point (-121.93220767 36.50603652)
28	2023-11-28 08:29:45	Point (-121.93240447 36.5061095)
29	2023-11-28 08:33:27	Point (-121.93235961 36.50642035)
30	2023-11-28 08:41:40	Point (-121.93217835 36.50666151)
31	2023-11-28 08:45:37	Point (-121.93179451 36.50695606)
32	2023-11-28 08:51:14	Point (-121.93115307 36.50633646)

Location #	Date/Time Visited	GPS Coordinates
33	2023-11-28 08:55:27	Point (-121.93045742 36.50621585)
34	2023-11-28 09:00:27	Point (-121.92996317 36.50664143)
35	2023-11-28 09:11:59	Point (-121.93307913 36.50534026)
36	2023-11-28 09:17:36	Point (-121.93373133 36.50553018)
37	2023-11-28 09:22:19	Point (-121.93413332 36.50542237)
38	2023-11-28 09:47:01	Point (-121.93631893 36.49725471)
39	2023-11-28 09:57:37	Point (-121.93605304 36.49730384)
40	2023-11-28 10:07:08	Point (-121.93536009 36.49676868)
41	2023-11-28 10:21:34	Point (-121.93447729 36.48737217)
42	2023-11-28 10:29:05	Point (-121.93404006 36.48753276)
43	2023-11-28 10:38:44	Point (-121.93312735 36.48774632)
44	2023-11-28 10:46:56	Point (-121.93519824 36.48645824)
45	2023-11-28 10:51:56	Point (-121.93535761 36.48606938)
46	2023-11-28 10:56:01	Point (-121.93523814 36.48541704)
47	2023-11-28 11:14:36	Point (-121.93887727 36.49185655)
48	2023-11-28 11:17:44	Point (-121.93933005 36.49215022)
49	2023-11-28 11:25:41	Point (-121.93942959 36.49248363)
50	2023-11-28 11:32:06	Point (-121.93848321 36.49160879)
51	2023-11-28 13:19:41	Point (-121.79621425 36.54435821)
52	2023-11-28 13:24:57	Point (-121.7964089 36.54345689)
53	2023-11-28 13:30:16	Point (-121.79612608 36.54301353)
54	2023-11-28 13:33:10	Point (-121.79616273 36.54304793)
55	2023-11-28 13:38:03	Point (-121.79612983 36.5423309)
56	2023-11-28 13:42:35	Point (-121.79617421 36.54214403)
57	2023-11-28 13:45:06	Point (-121.79658638 36.54179099)
58	2023-11-28 13:47:40	Point (-121.79653541 36.54173616)
59	2023-11-28 13:54:11	Point (-121.79700986 36.54141054)
60	2023-11-28 13:56:41	Point (-121.79679438 36.5406052)
61	2023-11-28 14:01:59	Point (-121.79687015 36.53984977)
62	2023-11-28 14:04:01	Point (-121.79697084 36.53943232)
63	2023-11-28 14:05:32	Point (-121.79690369 36.53944805)
64	2023-11-28 14:07:13	Point (-121.79712057 36.5391898)
65	2023-11-28 14:25:43	Point (-121.80362938 36.53070065)
66	2023-11-28 14:28:52	Point (-121.80369094 36.53052175)
67	2023-11-28 14:35:06	Point (-121.80345536 36.53110645)

Location #	Date/Time Visited	GPS Coordinates
68	2023-11-28 14:37:06	Point (-121.80354347 36.53122436)
69	2023-11-28 14:39:28	Point (-121.80351063 36.53134305)
70	2023-11-28 14:41:51	Point (-121.80357429 36.53176557)
71	2023-11-28 14:43:48	Point (-121.80310192 36.53226638)
72	2023-11-29 08:17:35	Point (-121.75453371 36.76482488)
73	2023-11-29 08:23:26	Point (-121.7542102 36.76513306)
74	2023-11-29 08:27:08	Point (-121.75379525 36.76547762)
75	2023-11-29 08:31:23	Point (-121.75344171 36.76581054)
76	2023-11-29 08:36:09	Point (-121.75311227 36.76601214)
77	2023-11-29 08:42:30	Point (-121.75438143 36.76584404)
78	2023-11-29 08:51:17	Point (-121.7547265 36.76614022)
79	2023-11-29 08:57:22	Point (-121.75637392 36.76578175)
80	2023-11-29 09:06:15	Point (-121.75672366 36.76580653)
81	2023-11-29 09:14:28	Point (-121.75695692 36.76561685)
82	2023-11-29 09:45:57	Point (-121.66633202 36.79461453)
83	2023-11-29 09:50:17	Point (-121.66588645 36.79529654)
84	2023-11-29 10:07:34	Point (-121.63009684 36.80210634)
85	2023-11-29 10:13:05	Point (-121.63001362 36.8027269)
86	2023-11-29 10:17:04	Point (-121.629967 36.80370486)
87	2023-11-29 10:19:21	Point (-121.62986929 36.80390217)
88	2023-11-29 10:22:51	Point (-121.62992906 36.80437276)
89	2023-11-29 10:35:19	Point (-121.63047159 36.80189887)
90	2023-11-29 10:41:55	Point (-121.6294668 36.80189947)
91	2023-11-29 11:02:40	Point (-121.68096513 36.83555996)
92	2023-11-29 11:08:50	Point (-121.67998793 36.83542204)
93	2023-11-29 11:23:53	Point (-121.6897865 36.85403521)
94	2023-11-29 11:26:02	Point (-121.68931123 36.85409748)
95	2023-11-29 11:29:56	Point (-121.6889685 36.85422742)
96	2023-11-29 11:33:41	Point (-121.68895093 36.85424994)
97	2023-11-29 11:35:51	Point (-121.68842471 36.85442573)
98	2023-11-29 11:37:33	Point (-121.68802235 36.85445825)
99	2023-11-29 13:27:26	Point (-121.76687177 36.93444391)
100	2023-11-29 13:37:55	Point (-121.76738276 36.93276713)
101	2023-11-29 13:42:18	Point (-121.7670005 36.93297388)
102	2023-11-29 13:46:13	Point (-121.76688413 36.93326709)

Location #	Date/Time Visited	GPS Coordinates
103	2023-11-29 13:51:44	Point (-121.76640367 36.93367176)
104	2023-11-29 14:02:15	Point (-121.76789752 36.93223788)
105	2023-11-29 14:21:30	Point (-121.76537852 36.91895619)
106	2023-11-29 14:23:09	Point (-121.76562189 36.91891473)
107	2023-11-29 14:26:30	Point (-121.7658064 36.91869706)
108	2023-11-29 14:30:09	Point (-121.76568045 36.91840987)
109	2023-11-29 14:32:27	Point (-121.76529787 36.91848496)
110	2023-11-29 14:35:01	Point (-121.76500727 36.91851708)
111	2023-11-29 14:35:46	Point (-121.76491991 36.91845319)
112	2023-11-29 14:37:06	Point (-121.76491049 36.91869365)
113	2023-11-29 14:39:26	Point (-121.76511426 36.91867472)
114	2023-11-29 14:46:42	Point (-121.7651965 36.91872937)
115	2023-11-29 15:10:40	Point (-121.82276205 36.93292037)
116	2023-11-29 15:15:37	Point (-121.82205135 36.93267789)
117	2023-11-29 15:18:21	Point (-121.82141717 36.93266271)
118	2023-11-29 15:20:30	Point (-121.82079656 36.93280054)
119	2023-11-29 15:26:15	Point (-121.82331463 36.93315786)
120	2023-11-29 15:29:03	Point (-121.82362219 36.93372201)
121	2023-11-29 15:34:10	Point (-121.82383935 36.93398931)
122	2023-11-30 08:16:58	Point (-121.38043989 36.85574908)
123	2023-11-30 08:33:12	Point (-121.38131092 36.8545038)
124	2023-11-30 08:35:43	Point (-121.38131905 36.8540748)
125	2023-11-30 08:37:51	Point (-121.38134929 36.85380055)
126	2023-11-30 08:41:06	Point (-121.38138481 36.85347244)
127	2023-11-30 08:46:13	Point (-121.38114533 36.85310474)
128	2023-11-30 08:48:44	Point (-121.3807842 36.853102)
129	2023-11-30 08:51:22	Point (-121.38033004 36.85275521)
130	2023-11-30 08:56:21	Point (-121.37980167 36.85235383)
131	2023-11-30 08:59:05	Point (-121.3793895 36.85230955)
132	2023-11-30 09:01:28	Point (-121.37901787 36.85230905)
133	2023-11-30 09:25:18	Point (-121.35748363 36.83683523)
134	2023-11-30 09:26:42	Point (-121.35788365 36.83684851)
135	2023-11-30 09:30:21	Point (-121.35825999 36.83684682)
136	2023-11-30 09:35:07	Point (-121.3590485 36.83695977)
137	2023-11-30 09:37:16	Point (-121.35924322 36.83719628)

Location #	Date/Time Visited	GPS Coordinates
138	2023-11-30 09:38:58	Point (-121.35937348 36.837314)
139	2023-11-30 09:40:41	Point (-121.35925068 36.837502)
140	2023-11-30 09:42:25	Point (-121.35934389 36.83774161)
141	2023-11-30 09:44:09	Point (-121.35924967 36.83784626)
142	2023-11-30 09:47:43	Point (-121.35931811 36.83839636)
143	2023-11-30 09:51:27	Point (-121.35824248 36.83794896)
144	2023-11-30 09:53:17	Point (-121.35816121 36.83761164)
145	2023-11-30 09:54:57	Point (-121.35821139 36.83728495)
146	2023-11-30 09:59:40	Point (-121.35652754 36.83681855)
147	2023-11-30 10:01:48	Point (-121.35620364 36.83680281)
148	2023-11-30 10:04:42	Point (-121.35557381 36.83680861)
149	2023-11-30 10:06:27	Point (-121.35539446 36.83681854)
150	2023-11-30 10:20:07	Point (-121.37210529 36.83864069)
151	2023-11-30 10:22:50	Point (-121.37218546 36.83860014)
152	2023-11-30 10:32:44	Point (-121.37272814 36.83857854)
153	2023-11-30 10:35:31	Point (-121.37332334 36.83863155)
154	2023-11-30 10:42:49	Point (-121.37335463 36.83877539)
155	2023-11-30 10:47:40	Point (-121.37149643 36.83864342)
156	2023-11-30 11:03:48	Point (-121.39853313 36.85670327)
157	2023-11-30 11:15:25	Point (-121.39858093 36.85720801)
158	2023-11-30 11:21:05	Point (-121.39851922 36.85743988)
159	2023-11-30 11:25:18	Point (-121.39849281 36.85792806)
160	2023-11-30 13:06:18	Point (-121.40389127 36.84931417)
161	2023-11-30 13:11:13	Point (-121.40556029 36.84961486)
162	2023-11-30 13:14:50	Point (-121.40626086 36.84954729)
163	2023-11-30 13:20:55	Point (-121.40567072 36.84913968)
164	2023-11-30 13:23:23	Point (-121.40569019 36.84895662)
165	2023-11-30 13:32:02	Point (-121.40588549 36.84847058)
166	2023-11-30 13:35:38	Point (-121.40639051 36.84848195)
167	2023-11-30 13:38:39	Point (-121.40673872 36.84838807)
168	2023-11-30 13:45:16	Point (-121.40737558 36.84845486)
169	2023-11-30 14:08:57	Point (-121.42513204 36.85455377)
170	2023-11-30 14:12:54	Point (-121.42500675 36.85441332)
171	2023-11-30 14:15:04	Point (-121.42484292 36.85438891)
172	2023-11-30 14:16:53	Point (-121.42490434 36.85481356)

Location #	Date/Time Visited	GPS Coordinates
173	2023-11-30 14:18:27	Point (-121.42499721 36.85520333)
174	2023-11-30 14:24:03	Point (-121.42411307 36.85516945)
175	2023-11-30 14:26:13	Point (-121.42412427 36.85499132)
176	2023-11-30 14:30:41	Point (-121.42414425 36.85467521)
177	2023-11-30 14:34:07	Point (-121.42396436 36.85390658)
178	2023-11-30 14:40:03	Point (-121.42391744 36.85583274)
179	2023-11-30 14:42:27	Point (-121.42396763 36.85625311)
180	2023-11-30 14:46:24	Point (-121.42414962 36.85690689)
181	2023-11-30 15:09:58	Point (-121.54308651 36.84664865)
182	2023-11-30 15:11:54	Point (-121.54287106 36.84688594)
183	2023-11-30 15:13:56	Point (-121.54287345 36.84687611)
184	2023-11-30 15:16:21	Point (-121.54234706 36.84706401)
185	2023-11-30 15:17:54	Point (-121.54221023 36.84733544)
186	2023-11-30 15:20:46	Point (-121.54167989 36.84771443)
187	2023-12-01 08:00:11	Point (-121.64292329 37.11338758)
188	2023-12-01 08:05:32	Point (-121.64343051 37.11407443)
189	2023-12-01 08:08:50	Point (-121.64292941 37.11430006)
190	2023-12-01 08:16:51	Point (-121.64299458 37.11464668)
191	2023-12-01 08:25:12	Point (-121.64228804 37.11498028)
192	2023-12-01 08:31:09	Point (-121.64171948 37.11510158)
193	2023-12-01 08:36:30	Point (-121.64131796 37.11530975)
194	2023-12-01 08:38:29	Point (-121.64085209 37.11554454)
195	2023-12-01 08:41:40	Point (-121.64031624 37.11565689)
196	2023-12-01 08:47:26	Point (-121.63999234 37.11578688)
197	2023-12-01 09:15:17	Point (-121.61269909 37.13534648)
198	2023-12-01 09:17:27	Point (-121.61286535 37.13545177)
199	2023-12-01 09:21:11	Point (-121.61231837 37.13540339)
200	2023-12-01 09:23:31	Point (-121.61242855 37.13540171)
201	2023-12-01 09:25:38	Point (-121.61230928 37.13533416)
202	2023-12-01 09:30:44	Point (-121.61224715 37.13479669)
203	2023-12-01 09:35:41	Point (-121.61218585 37.13470782)
204	2023-12-01 09:38:57	Point (-121.61148681 37.13517532)
205	2023-12-01 09:40:45	Point (-121.61133124 37.13514257)
206	2023-12-01 09:43:37	Point (-121.61129318 37.1348502)
207	2023-12-01 09:45:36	Point (-121.61110072 37.13483914)

Location #	Date/Time Visited	GPS Coordinates
208	2023-12-01 09:46:50	Point (-121.61102663 37.13490037)
209	2023-12-01 09:48:39	Point (-121.61098097 37.13553313)
210	2023-12-01 09:50:23	Point (-121.61118129 37.13573823)
211	2023-12-01 09:52:26	Point (-121.61104679 37.13597525)
212	2023-12-01 09:54:33	Point (-121.61115083 37.1360694)
213	2023-12-01 10:09:31	Point (-121.62396608 37.14303743)
214	2023-12-01 10:14:11	Point (-121.62376495 37.14243901)
215	2023-12-01 10:17:48	Point (-121.62301422 37.14189062)
216	2023-12-01 10:22:03	Point (-121.62248192 37.14246368)
217	2023-12-01 10:25:31	Point (-121.62151087 37.14342475)
218	2023-12-01 10:31:00	Point (-121.62192444 37.14456718)
219	2023-12-01 10:33:18	Point (-121.62243402 37.14414368)
220	2023-12-01 10:36:13	Point (-121.622709 37.1439111)
221	2023-12-01 10:38:50	Point (-121.62315804 37.14356462)
222	2023-12-01 10:40:30	Point (-121.62333174 37.14340778)

#### IV. 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.*

Location	Violation Description
5	Loose lashing wire debris on service drops. Charter staff removed the debris onsite.
41	Charter is missing a down guy. Currently the only down guys belong to PG&E and telecom.
42	Loose lashing wire.
77	A service drop touches telecom line and is dropped into gutter.
90	Cable debris on Charter line.
103	Charter riser damaged.
167	Messenger wire broken.
189	Equipment box not secured to building.
190	Ground wire not attached to pole.

**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.*

Location	Violation Description
101	Missing ground moulding.
151	Exposed ground wire.

**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.*

Location	Violation Description
42	Abandoned Charter drop.
48	Abandoned service drop.
101	Disconnected drop touching telecom.
120	Abandoned Charter and telecom service drops.
156	Abandoned service drop.
156	Abandoned service drop.
157	Broken abandoned cable.
158	Abandoned cable.
159	Abandoned service drop.
167	Abandoned service drop.

**GO 95, Rule 38, Table 2, Column C, Case 8** requires the minimum vertical separation of communications conductors (including service drops) installed at different levels on the same pole to be 12 inches.

The following Charter Communication conductors were in contact with a third-party conductor:

Location	Violation Description
29	Touching telecom and charter service drops.
39	Service drop touching telecom drop.
75	Service drop touching telecom service drop.
77	Service drop tangled with telecom service drop.
100	Telecom attached to Charter.
103	Span needs reset because Charter line falls lower than telecom and touches telecom drop.
156	Charter drop touching telecom drop and telecom lines are intertwined.
156	Cable hanging below telecom line.
196	Contact with telecom drops.

**GO 95, Rule 87.7.D.1, Covering or Guarding**, states:

*Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:*

- (a) *Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4–A, or*
- (b) *Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8.*

Location	Violation Description
40	Telecom and Charter missing protective guard around service drop risers.
48	Unprotected charter riser.
81	Riser guard missing.
153	Riser guard coming off and deteriorating.
159	Insecure riser.
168	Riser guard missing.
182	Needs riser guard.
185	Need riser guard.
190	Riser leaves guard at about 6.5 feet.

**GO 128, Rule 17.1, Design, Construction and Maintenance**, states in part:

*For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.*

Location	Violation Description
14	There is no ground despite vault being end of the line.
23	Ground wire was loose and had to be tightened in the field.
36	Vault filled with dirt.
37	Loose ground wire. Corrected onsite.
64	Loose ground wire. Corrected onsite.
66	Loose ground wire. Corrected onsite.
107	Heat shrink wrapping not installed properly potential violation.
129	House service drop exposed.
131	Missing ground wire.
134	Bush growing under lid. Cleared out onsite.
135	Ground rod just lying on ground.
142	Vault wall collapsed.
175	Missing ground.
181	Service drop exposed.
201	Pole lashed onto pedestal.
202	Loose ground wire. Corrected onsite.
212	Plant growth into pedestal. Partially cleared onsite.
219	Vault filled with leaves.

**GO 128, Rule 42.7, Covers,** states:

*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 (Also See Rule 17.8 and Appendix B, Figure 9).*

Location	Violation Description
9	Broken vault lid.
10	Broken vault lid and vault is covered with wood.
11	Broken vault lid.
19	Broken vault lid.
25	Broken vault lid.
88	Insecure lid. Secured onsite.
91	Insecure lid. Secured onsite.
106	Insecure lid. Secured onsite.
107	Insecure lid.
112	Insecure lid.
129	Missing lid garbage inside.
135	Insecure lid. Secured onsite.
153	Cracked lid.
169	Insecure lid. Secured onsite.
174	Broken lid.
202	Unable to secure lid due to vehicle position.
205	Broken vault lid.

**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.*

Location	Violation Description
191	Detached riser guard.
196	Riser conduit not attached to pole.

**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.*

Location	Violation Description
50	Loose down guys.
190	Guys are slack and anchor corroded.

**GO 95 Rule 86.7.B, Anchor Guys,** states in part:

*In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule 86.7–B.*

Location	Violation Description
42	Tree branch touching down guy above insulator. Same for telecom down guy on same pole.
164	Tree touching down guy above insulator.

During the field audit ESRB observed the following violations by third parties:

Location #	Violation Description	General Order	Rule Violation
7	Telecom moulding does not cover ground wire all the way to ground.	95	84.6.B
1	Telecom line abandoned on pole.	95	31.6
2	Moulding is missing for telecom ground wire.	95	84.6.b
27	Anchor guy above insulating bob touching tree.	95	56.7.B
29	Missing telecom riser guard.	95	87.7.D.1
42	No riser guard.	95	87.7.D.1
44	Sagging telecom line with failing lashing wire over canyon.	95	31.1
48	Unprotected telecom riser.	95	87.7.D.1
48	Slack telecom line.	95	86.2
49	Unprotected telecom service drops.	95	87.7.D.1

Location #	Violation Description	General Order	Rule Violation
50	Slack down guy.	95	56.2
72	Unprotected telecom riser.	95	87.7.D.1
72	Slack down guy.	95	56.2
77	Telecom line tied to Charter line.	95	Table 2
80	Abandoned drop.	95	31.6
80	Cut telecom line touching Charter service drops.	95	31.6
81	Abandoned line.	95	31.6
89	Rotted down guy guard.	95	31.1
113	Deformed cable.	128	17.1
113	Broken lid. Vault does not appear to be in use anymore.	128	42.7
118	Abandoned telecom line.	95	31.6
120	Slack down guy.	95	86.2
120	Bubbling ground moulding.	95	86.7.B
155	Telecom line slipped off messenger and resting on down guy.	95	Table 2
156	Abandoned telecom line.	95	31.6
157	Abandoned telecom line.	95	31.6
158	Telco missing riser guard.	95	87.7.D.1
167	Guy attached by rope.	95	31.1
167	Sagging telecom line.	95	Table 2
168	Coiled bare wire.	95	31.6
191	Riser telecom lines not attached to pole.	95	31.1
191	Abandoned telecom line.	95	31.6
192	Broken ground guard check if there's an exception.	95	84.6.B
195	Exposed ground.	95	84.6.B
196	Two telecom drops lower than 6 feet. Required to be at least 10 feet above ground.	95	Table 1
199	Vault lid is insecure.	128	42.7
219	Telecom lid warped and sticking out.	128	42.7