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April 4, 2025

Via Email  
Fadi Daye, P.E.  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Subject: Audit of AT&T Valley Construction District

Dear Mr. Daye,

The following is AT&T California's ("AT&T") response to your letter dated February 21, 2025 ("February Letter") regarding the Communication Infrastructure Provider Audit of AT&T Valley Construction District ("Valley Audit") conducted from August 19-23, 2024.

The February Letter requested that we advise you of actions taken by AT&T to address alleged conditions identified during the Safety and Enforcement Division's Valley Audit and requested a response by March 21, 2025. An extension was granted until April 4, 2025.

I am enclosing AT&T's Response to the Valley Audit.

Regards,

A handwritten signature in black ink that reads "R. Johnson".

Ross Johnson  
Director  
AT&T Regulatory  
415-417-5028  
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Enclosure:

AT&T's Response to the Valley Audit

Cc:  
Leslie Palmer, Director, Safety and Enforcement Division, CPUC  
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC  
Jose Lastra, Utilities Engineer, ESRB, SED, CPUC

## **AT&T'S RESPONSE TO THE VALLEY CONSTRUCTION DISTRICT AUDIT**

### **I. Records Review – Alleged Violations List**

Records Review Alleged Violation #1: AT&T's records indicated that from June 1, 2020, to June 31, 2024, AT&T completed 1 overhead patrol inspection past AT&T's scheduled due date.

**AT&T Response: Without admitting that AT&T violated GO 95, Rule 80.1-A (2) or Rule 31.2, as part of AT&T's annual review, AT&T identified 100 feet of cable within the boundary of DA R2022 BVSPCA11 –a high fire tier (HFT) 3 – late in 2020. Because that DA had not been previously inspected, a detailed inspection of the entire DA was done February 8, 2021.**

Records Review Alleged Violation #2: AT&T's records indicated that from June 1, 2020, to June 31, 2024, AT&T completed 182 overhead work orders past AT&T's due date for corrective action. Additionally, as of the date of the audit, AT&T had 480 open overhead work orders that were past AT&T's scheduled due date for corrective action.

**AT&T Response: Without admitting that AT&T violated GO 95, Rule 18 or Rule 31.1, the information AT&T produced in response to the pre-audit data request appears to indicate that 480 tickets are pending and 182 were closed late; however, a pending ticket or a ticket closed past the assigned due date does not necessarily mean that any related corrective action had not been completed by the assigned due date. Closing repair tickets is a time-consuming, manual process.**

Records Review Alleged Violation #3: The pole loading calculation for Pole 4590817E showed a span length in the northern direction leading to Pole 4760735E as 180 feet, however, the field measurement was 157 feet.

**AT&T Response: Without admitting that AT&T violated GO 95, Rule 31.1, AT&T used a vendor for this pole load and upon investigation determined pole 4590817E was the tail end pole from where the wire was turning to the customer building, and pole 4760735E was not fielded. GIS measurements were used to show that pole feet in the O-Calc Pro Analysis – GO 95 form which caused 15-20' difference.**

## **II. Field Inspection – Alleged Violations List**

Field Inspection Alleged Violation #1: The AT&T facilities on each of the following poles were not maintained for their intended use:

- 1786700E – AT&T had a damaged lashing wire
- 2320902E – AT&T had a vertical run of cable going down the pole that was unsecured
- 4590817E – AT&T had a damaged down guy marker
- 121432712 – AT&T had a damaged lashing wire
- 120389008 – an AT&T terminal box was open and had a bird nest protruding out of it
- 120388986 – an AT&T pole mount terminal box was left open and unsecured
- 120388921 – an AT&T pole mount terminal box was left open and unsecured
- T St, near 431 4th St – AT&T had a rope tied to the pole steps, supporting equipment

### **AT&T Response:**

- **Ticket 1648509 was opened for 1786700E, and it is due on 3/20/2030.**
- **Ticket 899092 previously opened for 2320902E was due on 1/18/24 and will be completed as soon as possible.**
- **Ticket 1648489 was opened for 4590817E, and it is due on 3/20/2030.**
- **Ticket 1648508 was opened for 121432712, and it is due on 3/20/2030.**
- **Ticket 1648500 was opened for 120389008, and it is due on 3/20/2028.**
- **Ticket 1648535 was opened for 120388986, and it is due on 3/20/2030.**
- **Ticket 1648501 was opened for 120388921, and it is due on 3/20/2030.**
- **Ticket 1648499 was opened for T St, near 431 4th St, and it is due on 3/20/2030.**

Field Inspection Alleged Violation #2: AT&T lines attached to each of the following poles were permanently abandoned:

- 122113574 – an AT&T service line was cut and left hanging low to the ground
- 6615 – an AT&T service line was hanging from the pole and wrapped around fence
- 705 Mesa Dr – an AT&T service line was abandoned and wrapped around a nearby tree
- 846 Haven Dr – an AT&T service line was abandoned and wrapped around a nearby fence
- 1032 Haven Dr – an AT&T service line was abandoned and tied to a nearby fence
- 122238991 – an AT&T service line was disconnected and hanging around the pole
- 122084068 – an AT&T service line was disconnected and left at the base of the pole
- 432 W Ash Ave, N side rear of property – an AT&T service line was disconnected and wrapped around the pole
- 120388986 – an AT&T service line was disconnected and hanging around the pole low to the ground

### **AT&T Response:**

- **Ticket 1648448 was opened for 122113574, and it is due on 3/20/2030.**
- **Ticket 1648534 was opened for 6615, and it is due on 3/20/2028.**
- **Ticket 1648511 was opened for 705 Mesa Dr. (correct address is 705 Normandy), and it is due on 3/20/2030.**
- **Ticket 1644350 was opened for 846 Haven Dr, and it is due on 3/20/2028.**
- **Ticket 1648537 was opened for 1032 Haven Dr, and it is due on 3/20/2028.**
- **Ticket 1648538 was opened for 122238991, and it is due on 3/20/2028.**
- **Ticket 1648536 was opened for 122084068, and it is due on 3/20/2028.**
- **Ticket 1644349 was opened for 432 W Ash Ave, N side rear of property, and it is due on 3/20/2028.**
- **Ticket 1648535 was opened for 120388986, and it is due on 3/20/2028.**

Field Inspection Alleged Violation #3: The AT&T facilities on each of the following poles had less than 12 inches of vertical clearance from a communications conductor supported on the same pole:

- 737 Mesa Dr: AT&T service drops were touching a third-party communications conductor.
- 122113574: an AT&T service drop was contacting a third-party communications service drop.
- 1769361E: an AT&T service drop was contacting a third-party communications service drop with the use of a zip tie.
- 1769360E: an AT&T communications conductor was entangled with a third-party communications service drop.
- 1786700E: an AT&T communications conductor was contacting a third-party communications service drop.
- 400 W Ash Ave, NE side of property: an AT&T communications conductor was entangled with a third-party communications conductor.
- 378 Terra Vista Ln, W side of property: an AT&T service drop was contacting a third-party communications service drop.
- 122084067: an AT&T service drop was contacting a supply service drop near the home.
- 493 W Euclid Ave: an AT&T service drop was contacting a third-party communications service drop.
- 400 W Ash Ave, NW side of property: an AT&T service drop was contacting a third-party communications service drop.
- 120388986: an AT&T communications conductor was contacting a third-party service drop midspan
- 120388999: an AT&T service drop was contacting a third-party communications service drop.
- 120388923: an AT&T communications conductor was contacting a third-party communications service drop.

**AT&T Response:**

- Ticket 1648448 was opened for 737 Mesa Dr (correct address 737 Normandy Dr), and it is due on 3/20/2030.
- Ticket 1648449 was opened for 122113574, and it is due on 3/20/2030.
- Ticket 1648453 was opened for 1769361E, and it is due on 3/20/2030.
- Ticket 1427327 was previously opened for 1769360E, and it is due 1/25/2027.
- Ticket 1648509 was opened for 1786700E, and it is due on 3/20/2030.
- Ticket 1648507 was opened for 400 W Ash Ave, NE side of property, and it is due on 3/20/2030.
- Ticket 1648450 was opened for 378 Terra Vista Ln, W side of property, and it is due on 3/20/2030.
- Ticket 1648451 was opened for 122084067, and it is due on 3/20/2030.
- Ticket 1648452 was opened for 493 W Euclid Ave, and it is due on 3/20/2030.
- Ticket 1644348 was opened for 400 W Ash Ave, NW side of property, and it is due on 3/20/2030.
- Ticket 1648451 was opened for 122084067, and it is due on 3/20/2030.
- Ticket 1648452 was opened for 493 W Euclid Ave, and it is due on 3/20/2030.
- Ticket 1648535 was opened for 120388986, and it is due on 3/20/2028.
- Ticket 1648529 was opened for 120388999, and it is due on 3/20/2028.
- Ticket 1648530 was opened for 120388923, and it is due on 3/20/2028.

Field Inspection Alleged Violation #4: The AT&T facilities on each of the following poles had less than 3 inches of radial clearance from a guy wire or span wire supported on the same pole:

- Pole 4590818E: an AT&T communications conductor was touching a down guy wire supported on the same pole.
- Pole 1355556E: an AT&T communications conductor was touching a span guy wire supported on the same pole.
- Pole 121446833: an AT&T service drop was wrapped around a down guy wire supported on the same pole.

**AT&T Response:**

- Ticket 1648527 was opened for 4590818E, and it is due on 3/20/2028.
- Ticket 1648528 was opened for 1355556E, and it is due on 3/20/2030.
- Ticket 1648526 was opened for 121446833, and it is due on 3/20/2030.