PUBLIC UTILITIES COMMISSION

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March 11, 2025 CA2024-1229

Lisa Ludovici
Director, Government Affairs - Central and Northern California
Charter Communications (Charter)
270 Bridge St
San Luis Obispo, CA 93401

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Charter's Tahoe Region

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell of ESRB staff conducted a CIP audit of Charter Tahoe Region from August 05, 2024 through August 09, 2024. During the audit, ESRB staff conducted field inspections of Charter's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than April 09, 2025, via electronic copy of all corrective actions and preventive measures taken by Charter to correct the identified violations and prevent the recurrence of such violations and observations.

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 Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC CIP Audit Findings of Charter Tahoe Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Yang Yi, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
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Ryan Lindsay, Senior Manager, Construction, Charter Communications

CHARTER TAHOE REGION
COMMUNICATIONS AUDIT FINDINGS
AUGUST 05-09, 2024

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Charter Tahoe Region:

- Facility statistics as of June 2024, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Overhead (OH) and Underground (UG) facility maps as of June 2024.
- Current and previous versions of wired and wireless, OH and UG maintenance policies, procedures, and programs, that were effective from June 2019 through June 2024 for compliance with GOs 95 and 128.
- Inspection and patrol records containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings and repairs from June 2019 through June 2024.
- Notification records for wired and wireless, OH and UG facilities containing data for inspected facility type, facility location, fire threat district location, repair, due date and completed date from June 2019 through June 2024.
- Safety Hazards Notifications received from third-party utilities from June 2019 through June 2024.
- Safety Hazards Notifications sent to third-party utilities from June 2019 through June 2024.
- Pole loading calculations, including intrusive testing for Tier 2 and Tier 3 High Fire Threat Districts from June 2023 through June 2024.
- Current inspector training program for compliance with GO 95 and 128.
- New construction projects from June 2023 through June 2024.

II. Records Violations

ESRB staff observed the following violations during the record review portion of the audit:

1. **General Order (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(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District (HFTD) states in part:

   "In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals… shall not exceed the time specified in the following Table."

   ESRB sampled a total of 50 detailed inspection records from the *Spida Patrol_detail_3rd Party* document to verify the accuracy of Charter's HFTD assignments. 40 of these 50 entries started a 9-year countdown after the detailed inspection which ESRB interpreted as Tier 2 HFTD locations since the timeframe coincided with the required Tier 2 HFTD detailed inspection cycles. ESRB identified that 19 out of the 40 locations were actually located in a Tier 3 HFTD which require five-year detailed inspection cycles.

   The remaining ten of the sampled entries started a 19-year countdown which ESRB interpreted as non-HFTD locations. Five of the ten assets were in a Tier 2 HFTD which require 10-year detailed inspection cycles. Therefore, ESRB identified that Charter assigned incorrect HFTD areas to nearly half of the sampled locations (24 out of 50) and has not been performing detailed inspections in accordance with GO 95, Rule 80.1-A(1).

2. **GO 95, Rule 80.1-A(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District** states in part:

   "In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals… shall not exceed the time specified in the following Table."

   Table 1: HFTD CIP Overhead(OH) Inspection Cycle

Inspection	Tier 2	Tier 3
Patrol	2 years	1 year
Detailed	10 years	5 years

   Based on Charter's Area Miles and Structures Report for Lake Tahoe 2024, Charter is attached to 5,906 poles, and almost all of them are in HFTD Tier 2 or 3. In the five-year data review period, ESRB expects to find a minimum combination of two patrols and/or detailed inspections for every pole in a Tier 2 or Tier 3 HFTD based on the required

inspection cycles in GO 95, Rule 80.1-A(1). The *Spida Patrol_detail_3rd Party*, *PRISM data base Patrol,* and *PRISM Completed Projects* documents have only a combined total of 5,307 total patrols and/or detailed inspections, shown below in Table 2. The records provided only account for about half of the expected number of patrols and/or detailed inspections required.

Table 2: OH Patrols/Inspections

Document	Number of OH Patrols/Inspections
Spida Patrol_detail_3rd Party	5,106
PRISM data base Patrol	129
PRISM Completed Projects	72
Total	**5,307**

3. **GO 95, Rule 18-B, Maintenance Programs** states in part:

"Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities."

(1) "Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.
   a. The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:
      i. Level 1 -- An immediate risk of high potential impact to safety or reliability:
         - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*

      ii. Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:

- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

iii. *Level 3 -- Any risk of low potential impact to safety or reliability:*
- *Take corrective action within 60 months subject to the exception specified below."*

ESRB reviewed Charter's Tahoe area corrective notifications from June 2019 through June 2024 and found that Charter completed a total of 1,380 notifications late. Table 3 breaks down the total late notifications for the Tahoe area by priority.

Table 3: Tahoe Region Late Notifications

Priority Levels	Late Pending	Late Complete	Total
Missing	0	1	1
1	0	3	3
2	1,069	292	1,361
3	3	12	15
Total	1,072	308	**1,380**

Table 3 includes both late completed notifications and the late pending notifications for each priority. Late completed notifications are any notifications completed after the due dates that apply to the notifications' priority level per GO 95, Rule 18-B. Pending notifications are any notifications that were still open with a due date prior to June 01, 2024.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
1	297840	Pole	38.902605, -120.011581
2	102851	Pole	38.902561, -120.01088
3	102852	Pole	38.902552, -120.010204
4		Pole	38.902576, -120.009461
5	259722	Pole	38.902547, -120.009104
6	102854	Pole	38.902513, -120.00864
7	102849	Pole	38.902505, -120.012232
8	107333	Pole	38.903229, -120.012273
9	293322	Pole	38.903746, -120.012279
10	259637	Pole	38.904313, -120.012301
11	J-40558	Pole	38.904866, -120.012305
12	135142	Pole	38.904331, -119.984624
13		Pole	38.903675, -119.98464
14	146431	Pole	38.903164, -119.984633
15	135231	Pole	38.90256, -119.984592
16	292693	Pole	38.902167, -119.98461
17	153368	Pole	38.904761, -119.97205
18	135188	Pole	38.904811, -119.972554
19	135187	Pole	38.904795, -119.973266
20	135186	Pole	38.904766, -119.973893
21	122928	Pole	38.900596, -119.958308
22	122874	Pole	38.90088, -119.959025
23	122873	Pole	38.90141, -119.95947
24	122872	Pole	38.901987, -119.95971
25	120464	Pole	38.902638, -119.959722
26		Pedestal	38.925824, -119.963379
27		Pedestal	38.926043, -119.963728
28		Pedestal	38.926381, -119.963931
29		Pedestal	38.926948, -119.963712
30		Pedestal	38.926668, -119.963956
31		Dog house	38.9254, -119.963073
32	107476	Pole	38.937945, -119.948267
33	97076	Pole	38.93813, -119.948341
34	97077	Pole	38.938541, -119.948644
35	97078	Pole	38.938839, -119.948893
36	83256	Pole	38.944354, -119.952289
37	292452	Pole	38.944547, -119.951795
38	83255	Pole	38.944787, -119.951364
39	83254	Pole	38.944869, -119.951088

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
40	83253	Pole	38.94521, -119.950267
41	83257	Pole	38.944134, -119.952759
42	83258	Pole	38.943805, -119.953361
43	135217	Pole	38.958355, -119.950278
44		Pole	38.958812, -119.950191
45	192988	Pole	38.959316, -119.949912
46	290956	Pole	38.959856, -119.949705
47	290150	Pole	38.960095, -119.949556
48	281233	Pole	39.238542, -120.0269
49		Pole	39.238527, -120.026468
50	232409	Pole	39.238473, -120.026209
51	16	Pole	39.238502, -120.025986
52	15	Pole	39.238476, -120.025475
53	294511	Pole	39.238118, -120.026925
54	294509	Pole	39.239287, -120.026976
55	294508	Pole	39.239657, -120.027052
56	264163	Pole	39.228938, -120.076178
57	183495	Pole	39.229449, -120.076172
58	183496	Pole	39.229853, -120.075922
59	120525	Pole	39.230422, -120.076094
60	120524	Pole	39.230888, -120.075881
61	139532	Pole	39.228955, -120.075622
62	109141	Pole	39.228953, -120.074925
63	124806	Pole	39.208206, -120.098104
64	124807	Pole	39.207732, -120.098447
65	180568	Pole	39.207372, -120.098698
66	124809	Pole	39.206892, -120.098957
67	13330	Pole	39.173398, -120.140757
68	292035	Pole	39.173882, -120.139966
69	61461	Pole	39.173641, -120.140398
70	252368	Pole	39.174196, -120.139666
71	232371	Pole	39.17454, -120.139968
72	120691	Pole	39.174458, -120.14006
73	61460	Pole	39.173938, -120.14072
74	61749	Pole	39.174204, -120.141047
75	90694	Pole	39.157779, -120.150269
76	90693	Pole	39.158263, -120.150183
77	90692	Pole	39.158695, -120.150093
78	90691	Pile	39.159168, -120.150003
79	90674	Pole	39.157402, -120.150445
80	90675	Pole	39.157444, -120.149822
81	294930	Pole	38.923217, -120.008907
82	70241	Pole	38.923262, -120.009125

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
83	297666	Pole	38.923579, -120.009596
84	228083	Pole	38.923753, -120.009984
85	297664	Pole	38.923946, -120.010266
86		Pole	38.924385, -120.010859
87	77248	Pole	38.924795, -119.998547
88	77249	Pole	38.924443, -119.998844
89	77250	Pole	38.923917, -119.999165
90	80856	Pole	38.923579, -119.999508
91	293332	Pole	38.923133, -119.99983
92	201717	Pole	38.942533, -119.988191
93		Ped	38.942675, -119.987859
94	135435	Pole	38.942713, -119.987896
95	94827	Pole	38.942689, -119.987478
96		Pole	38.94279, -119.986789
97		Pedestal	38.92986, -120.005364
98		Pedestal	38.930165, -120.005555
99		Pedestal	38.93025, -120.005719
100		Pedestal	38.930459, -120.005726
101		Pedestal	38.930775, -120.005887
102		Dog house	38.930465, -120.005976
103		Pedestal	38.93024, -120.006527
104		Pedestal	38.930183, -120.006817
105		Pedestal	38.930016, -120.007173
106		Pedestal	38.929821, -120.007707
107	107321	Pole	38.855725, -120.041218
108	120351	Pole	38.855717, -120.040526
109	293306	Pole	38.855626, -120.039709
110	131373	Pole	38.856006, -120.039336
111	131372	Pole	38.856598, -120.03921
112	J48979	Pole	38.8572, -120.039068
113	107435	Pole	38.857763, -120.038905
114	111421	Pole	38.863548, -120.034736
115	111422	Pole	38.863279, -120.034566
116	111423	Pole	38.862815, -120.034504
117	290951	Pole	38.862441, -120.034746
118	290464	Pole	38.862045, -120.035106
119	111426	Pole	38.861743, -120.035532
120	111427	Pole	38.861471, -120.03585
121	102785	Pole	38.876277, -120.032086
122	102786	Pole	38.876536, -120.032095
123	102787	Pole	38.877009, -120.032187
124	102783	Pole	38.87743, -120.032251
125	102789	Pole	38.877972, -120.032281

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
126	102790	Pole	38.878509, -120.032398
127	146356	Pole	38.864488, -120.005229
128	153305	Pole	38.864329, -120.005152
129	146355	Pole	38.864114, -120.00568
130	153458	Pole	38.864065, -120.006311
131	153457	Pole	38.863693, -120.006655
132	J53546	Pole	38.852468, -120.014947
133	297877	Pole	38.852837, -120.015193
134	102839	Pole	38.85258, -120.015661
135	102838	Pole	38.852374, -120.0161
136	97096	Pole	38.8521, -120.016569

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **GO 95, Rule 12.2 Maintenance of Lines** states:

   "All lines and portions of lines shall be maintained in such condition as to provide safety factors not less than those specified in Rule 44.3. Lines and portions of lines constructed or reconstructed on or after the effective date of this Order shall be kept in conformity with the requirements of this Order.

   The restoration of clearance originally established prior to the effective date of this Order, where the original clearance has been reduced by additional sagging or other causes, is not considered to be reconstruction and the reestablished clearance shall conform to the requirements of the rules in effect at the time the original clearance was established. The changing of clearance for any other purpose is reconstruction and clearances so changed shall comply with the rules of this Order applicable to reconstruction."

   ESRB's findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 12.2 Findings

Location	Findings
16	Incomplete pole transfer
68	Incomplete pole transfer
81	Incomplete pole transfer
83	Incomplete pole transfer
85	Incomplete pole transfer
86	Incomplete pole transfer

2. **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."

ESRB's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 31.1 Findings

Location	Findings
37	Damaged alley arm brace
66	Broken lashing wire
86	Broken lashing wire

3. **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."*

ESRB's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 31.6 Findings

Location	Findings
34	Abandoned service drop
35	Abandoned service drop
45	Abandoned ground wire
51	Abandoned service drop
72	Abandoned service drop
90	Abandoned service drop
116	Abandoned service drop
119	Abandoned service drop

4. **GO 95, Rule 84.6-B, Ground Wires** states:

"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. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.

Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8)."

ESRB's findings related to the above rule are listed in Table 7:

Table 7: GO 95, Rule 84.6-B Findings

Location	Findings
25	Exposed ground wire
43	Exposed ground wire
108	Exposed ground wire
111	Exposed ground wire
123	Exposed ground wire

5. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, etc.** states:

"Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.

The clearances specified in Table 1, Case 1, Columns A, B, D, E and F, shall in no case be reduced more than 5% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions. The clearances specified in Table 1, Cases 2 to 6 inclusive, shall in no case be reduced more than 10% below the

tabular values because of temperature and loading as specified in Rule 43, or other conditions.

The clearance specified in Table 1, Case 1, Column C (22.5 feet), shall in no case be reduced below the tabular value because of temperature and loading as specified in Rule 43.

The clearances specified in Table 1, Cases 11, 12 and 13, shall in no case be reduced below the tabular values because of temperatures and loading as specified in Rule 43. Where supply conductors are supported by suspension insulators at crossings over railroads which transport freight cars, the initial clearances shall be sufficient to prevent reduction to clearances less than 95% of the clearances specified in Table 1, Case 1, through the breaking of a conductor in either of the adjoining spans. Where conductors, dead ends, and metal pins are concerned in any clearance specified in these rules, all clearances of less than 5 inches shall be applicable from surface of conductors (not including tie wires), dead ends, and metal pins, except clearances between surface of crossarm and conductors supported on pins and insulators (referred to in Table 1, Case 9) in which case the minimum clearance specified shall apply between center line of conductor and surface of crossarm or other line structure on which the conductor is supported.

All clearances of 5 inches or more shall be applicable from the center lines of conductors concerned.

When measuring the minimum allowable vertical conductor clearances in a span, the minimum clearance applies to the specific location under the span being measured and not for the entire span."

ESRB's findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 37 Findings

Location	Findings
22	Low service drop at mid span
134	Low service drop
135	Low service drop

6. **GO 95, Rule 38, Minimum Clearance of Wires from Other Wires** states in part:

> *"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive."*

ESRB's findings related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 38 Findings

Location	Findings
3	Span sagging onto phone
7	Service drop not properly lashed, sagging onto phone
23	Service drop contacting phone
55	Insufficient clearance to power requires a guard arm
65	Insufficient clearance to phone
70	Insufficient clearance to phone
95	Insufficient clearance to phone
112	Insufficient clearance to phone
113	Insufficient clearance to phone
117	Insufficient clearance to phone
121	Insufficient clearance to phone

7. **GO 95, Rule 86.2, Guys-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."*

ESRB's findings related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 86.2 Findings

Location	Findings
56	Missing down guy on deadend
70	Slack down guy

8. **GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground** 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"

ESRB's findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 87.7-D(1) Findings

Location	Findings
12	Missing riser guard
13	Missing riser guard
14	Missing riser guard
77	Missing riser guard
79	Missing riser guard
87	Riser guard is not 8 feet
88	Riser not properly secured to pole
89	Riser not properly secured to pole
91	Riser not properly secured to pole

Location	Findings
94	Missing riser guard
120	Missing riser guard
127	Riser guard is not 8 feet
130	Riser guard is not 8 feet
134	Riser guard is not 8 feet

9. **GO 128, Rule 17.1, 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.*
>
> *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."*

ESRB's findings related to the above rule are listed in Table 12:

Table 12: GO 128, Rule 17.1 Findings

Location	Findings
27	The pedestal is broken and cannot be secured
28	Pedestal found open. Charter corrected the issue in the field.
30	The pedestal cannot securely close.
31	The pedestal ground detached from the case
98	The pedestal is broken and cannot be secured
99	Pedestal found open. Charter corrected the issue in the field.
102	Doghouse lid is damaged and cannot be secured
104	Pedestal being uprooted by tree

V. Observations

1. **GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities** states in part:

   "For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property."

   GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

   "(3) 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 ten (10) business days after the discovery.
   (4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95."

   During the field inspection, ESRB noted the third-party safety concerns listed in Table 13.

Table 13: Third-Party Observations

Location	Entity	Violation Description
11	AT&T	Missing riser guard
12	AT&T	Missing riser guard
13	AT&T	Missing riser guard
14	AT&T	Riser guard not 8 feet
16	AT&T	Pole transfer
17	AT&T	Loose down guy
21	Liberty Utilities	Woodpecker damage

Location	Entity	Violation Description
33	AT&T	Short, broken riser guard
37	AT&T	Pole transfer
44	AT&T	Abandoned drop
44	AT&T	Service drop contact
46	AT&T	Decayed buddy pole needs transfer
47	Liberty Utilities	Abandoned pole
52	AT&T	Low pole step with climbable fence, broken ground molding
58	AT&T	Slack down guy
59	AT&T	Abandoned drop, slack down guy
60	Liberty Utilities	Loose hardware on transformer
62	AT&T	Low drop
65	AT&T	Broken lashing wire
74	Liberty Utilities	Exposed ground rod
75	Liberty Utilities	Extensive woodpecker damage
77	AT&T	Missing riser cover
77	Liberty Utilities	Missing ground molding
80	AT&T	Abandoned drop
81	AT&T	Pole transfer with abandoned drops
83	AT&T	Pole transfer
85	AT&T	Pole transfer
86	AT&T	Pole transfer
91	AT&T	Missing riser cover
94	AT&T	Abandoned drop
95	AT&T	Abandoned drop
96	AT&T	Riser cover not 8 feet

Location	Entity	Violation Description
109	AT&T	Pole transfer
115	Liberty Utilities	Extensive woodpecker damage
117	AT&T	Abandoned drop
120	AT&T	Need riser cover
124	AT&T	Slack down guy
124	Liberty Utilities	Slack down guy
125	AT&T	Broken down guy
125	Liberty Utilities	Loose transformer hardware, broken ground molding
127	AT&T	Needs taller riser guard
130	AT&T	Needs taller riser guard
133	AT&T	Pole transfer
136	Liberty Utilities	Ground molding not secured to pole