STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

April 10, 2025 CA2024-1300

Ross Johnson
AT&T Director of Regulatory Relations
430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Merced, Tuolumne, Mariposa, & Madera County Region

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Nora Nguyen of ESRB staff conducted a CIP audit of AT&T's Merced, Tuolumne, Mariposa and Madera County region from December 16 to December 20, 2024. During the audit, ESRB staff conducted field inspections of AT&T's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than May 8, 2025, by electronic copy of all corrective actions and preventive measures taken by AT&T 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 the audit on the CPUC website. If there is any information in your response that you want 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 Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@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 Report for AT&T Merced, Tuolumne, Mariposa & Madera County Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC

Eric Wu, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Yi “Rocky” Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Jovan Hicks, Regulatory Affairs, AT&T
Saira Pasha, Regulatory & Legislative Affairs, AT&T

CPUC AUDIT FINDINGS OF AT&T

MERCED, TUOLUMNE, MARIPOSA & MADERA COUNTY

DECEMBER 16 – 20, 2024

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- AT&T's Overhead Lines Maintenance Plan Version 5.5, August 30, 2024
- AT&T's Visual Inspections of Overhead Lines
- AT&T's Facility Statistics of Merced, Tuolumne, Mariposa & Madera Counties
- AT&T's List of Facility Locations
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the Last 5 Years (November 2019 – October 2024)
- Most Recent Work Orders Conducted in the Last 5 Years (November 2019 – October 2024)
- Pole Loading Calculations Conducted in the Last 5 Years (November 2019 – October 2024)
- Safety Hazard Notifications AT&T Received and Sent to Third Parties in the Last 5 Years (November 2019 – October 2024)
- Employee statistics
- Records for Intrusive Pole Inspections Conducted in the Last 5 Years (November 2019 – October 2024)
- List of Pole Calculations Conducted in the Last 5 Years (November 2019 – October 2024)
- New Construction Projects Completed in the Last 12 Months

II. Records Violations

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

1. **GO 95, Rule 18-B1(a), Maintenance Programs** states in part:

   "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's review of AT&T's work orders from November 2019 through October 2024 found that AT&T had 250 out of 5,801 (or 4.3%) pending work orders that were overdue and 319 out of 2,168 (or 14.7%) closed work orders that were completed late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 569 late work orders by hazard level.

Table 1: Late Work Orders

Hazard Level	Late-Pending Work Orders[1]	Late-Closed Work Orders	Total Late Work Orders
1	1	31	32
2	11	19	30
2a	40	13	53
2b	66	226	292
2c	122	29	151
3	10	1	11
Total	250	319	569

AT&T must provide ESRB with its corrective action plan to complete the 250 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue non-exempt work orders for each

[1] As of October 1, 2024.

priority level.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
1	613016	1,626
2	526740	727
2a	517214	1,452
2b	1055036	874
2c	526086	1,458
3	498977	62

AT&T identified work order #613016 on April 16, 2020, to repair a broken B-box handle with a required end date of April 19, 2020. AT&T has not yet completed the work.

AT&T identified work order #526740 on December 12, 2019, for a pole transfer with a required end date of October 5, 2022. AT&T has not yet completed the work.

AT&T identified work order #517214 on November 28, 2019, to repair a leaning pole with a required end date of October 10, 2020. AT&T has not yet completed the work.

AT&T identified work order #1055036 on March 8, 2022, to replace a down guy with a required end date of May 11, 2022. AT&T has not yet completed the work.

AT&T identified work order #526086 on December 12, 2019, to replace a deteriorated pole with a required end date of October 4, 2020. AT&T has not yet completed the work.

AT&T identified work order #498977 on November 2, 2019, to transfer facilities to a new pole with a required end date of July 31, 2024. AT&T has not yet completed the work.

AT&T identified work order #1063926 on March 16, 2022, for replacement of the underground vault. During the field audit, ESRB visited the location for this work order and identified that the underground vault was not replaced, and the condition still existed. The work order was closed inadvertently on April 26, 2022 before the work was completed.

2. **GO 95, Rule 80.1A(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, inspection intervals for (i) Communication Lines located on Joint Use Poles (see Rule 21.8) that contain Supply Circuits (see Rule 20.6-D), and (ii) Communication Lines attached to a pole that is

within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table."

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

AT&T has a total of 2,064 late patrol inspections conducted from 2019 to 2024. The AT&T DA sites with late patrol inspections are listed Table 3 below. There are a total of 623 days in between patrol inspections for AT&T DA 320501-NTN1110. AT&T DA 110101-NGO4203 did not have any record of a patrol inspection conducted. A detailed inspection was conducted on 6/19/2023. A patrol inspection is required every year for a joint use pole in a Tier 3 HFTD (High Fire Threat District).

Table 3: Late Patrol Inspections

DA_PSA_CD	UN_DA_NA	CLLI_ID	Fire Tier	Pole Count	Initial Patrol Inspection	Following Patrol or Detailed Inspection
2101	NTN3134	TWHRCA11	3	71	9/19/2020	5/25/2022
321901	NTN1201	TWHRCA11	3	311	9/16/2020	1/2/2022
4304	NTN2107	TWHRCA11	3	56	9/22/2020	1/5/2022
412901	NTN2208	TWHRCA11	3	311	9/24/2020	5/25/2022
2203	NTN2109	TWHRCA11	3	175	9/22/2020	5/22/2022
1313	NTN2203	TWHRCA11	3	147	9/22/2020	5/22/2022
320501	NTN1110	TWHRCA11	3	149	9/10/2020	5/26/2022
410301	NTN1202	TWHRCA11	3	287	9/16/2020	5/25/2022
120101	NTN2202	TWHRCA11	3	91	9/22/2020	5/23/2022
1139	NTN1204	TWHRCA11	3	70	9/17/2020	5/26/2022
1133	NTN2108	TWHRCA11	3	135	9/22/2020	5/22/2022
2301	NTN1205	TWHRCA11	3	256	9/13/2020	5/26/2022
110101	NGO4203	GVLDCA11	3	5	NA	6/19/2023
Total				**2,064**		

3. **GO 95, Rule 80.1.A.(4) – Record Keeping** states:

   "Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a)."

   AT&T's inspection spreadsheets are missing the personnel who performed each inspection, and the personnel who performed each corrective action.

III. Field Inspection

During the field inspection from December 16 to December 20, 2024, ESRB staff inspected AT&T's communication facilities in the locations listed in Table 4.

Table 4: Field Inspection Locations

Location #	Address/GPS Location	Structure Type	Structure #
1	335 Columbia Ave. Merced, CA	UG Handhole	N/A
2	395 Columbia Ave. Merced, CA	UG Handhole	N/A
3	475 Columbia Ave. Merced, CA	UG Handhole	N/A
4	425 Columbia Ave. Merced, CA	UG Handhole	N/A
5	3366 De Anza Ct. Merced, CA	UG Handhole	N/A
6	3370 De Anza Ct. Merced, CA	UG Handhole	N/A
7	3370 De Anza Ct. Merced, CA	UG Handhole	N/A
8	677 Loughborough Dr. Merced, CA	B-Box	N/A
9	2525 R St. Merced, CA	UG Handhole	N/A
10	1136 W. 23rd St. Merced, CA	Pole	120299738
11	1160 W. 23rd St. Merced, CA	Pole	120103772
12	(37.2918868, -120.4862160)	Pole	N/A
13	(37.2920425, -120.4866589)	Pole	120894986
14	620 Lesher Dr. Merced, CA	Pole	110296233
15	114833 Peaceful Valley Rd. Sonora, CA	Pole	N/A
16	14800 Peaceful Valley Rd. Sonora, CA	Pole	14788
17	14858 Peaceful Valley Rd. Sonora, CA	Pole	14848
18	19452 Hillsdale Rd. Sonora, CA	Pole	110363816
19	19444 Hillsdale Rd. Sonora, CA	Pole	122240997

Location #	Address/GPS Location	Structure Type	Structure #
20	19428 Hillsdale Rd. Sonora, CA	Pole	120004889
21	19412 Hillsdale Rd. Sonora, CA	Pole	19406
22	19396 Hillsdale Rd. Sonora, CA	Pole	19396
23	20057 Phoenix Lake Rd. Sonora, CA	Pole	20073
24	20097 Phoenix Lake Rd. Sonora, CA	Pole	122133213
25	13500 Joshua Way Sonora, CA	Pole	110418188
26	(37.9705227, -120.3481392)	Pole	Y67D
27	13522 Joshua Way Sonora, CA	Pole	263005
28	19682 Pine Rd. Sonora, CA	Pole	19674
29	19682 Pine Rd. Sonora, CA	Pole	121483827
30	916 Mono Way Sonora, CA	Pole	097P
31	(37.9757260, -120.3676761)	Pole	120007473
32	231 Lyons St. Sonora, CA	Pole	120826515
33	81 Palemone St. Sonora, CA	Pole	N/A
34	97 Palemone St. Sonora, CA	Pole	N/A
35	207 Yaney Ave. Sonora, CA	Pole	93
36	50 Oak St. Sonora, CA	Pole	N/A
37	78 Oak St. Sonora, CA	Pole	94
38	31 William St. Sonora, CA	Pole	N/A
39	75 William St. Sonora, CA	Pole	N/A
40	509 S. Stuart St. Sonora, CA	Pole	362819
41	488 S. Stuart St. Sonora, CA	Pole	120032238
42	470 S. Stuart St.	Pole	120827116

Location #	Address/GPS Location	Structure Type	Structure #
	Sonora, CA		
43	10602 7th St. Jamestown, CA	Pole	120021352
44	10630 7th St. Jamestown, CA	Pole	N/A
45	18213 9th Ave. Jamestown, CA	Pole	120509344
46	18201 Seco St. Jamestown, CA	Pole	N/A
47	18193 Seco St. Jamestown, CA	Pole	N/A
48	17927 Seco St. Jamestown, CA	Pole	N/A
49	17925 Seco St. Jamestown, CA	Pole	121264117
50	17925 Seco St. Jamestown, CA	Pole	121378087
51	17181 Chicken Ranch Rd. Jamestown, CA	Pole	N/A
52	17193 Chicken Ranch Rd. Jamestown, CA	Pole	121714675
53	17170 Chicken Ranch Rd. Jamestown, CA	Pole	N/A
54	(37.8885595, -120.4864017)	Pole	N/A
55	10368 Dexter Ln. Coulterville, CA	Pole	121484090
56	10368 Dexter Ln. Coulterville, CA	Pole	121949868
57	10365 Dexter Ln. Coulterville, CA	Pole	122001767
58	6430 Greeley Hill Rd. Coulterville, CA	Pole	86
59	10304 Greeley Hill Rd. Coulterville, CA	Pole	120575863
60	10310 Fiske Rd. Coulterville, CA	Pole	120575857
61	10134 Holtzel Rd. Coulterville, CA	Pole	120575889
62	10134 Holtzel Rd. Coulterville, CA	Pole	120575890
63	10134 Holtzel Rd. Coulterville, CA	Pole	9-2
64	10236 Holtzel Rd.	Pole	120576425

Location #	Address/GPS Location	Structure Type	Structure #
	Coulterville, CA		
65	(37.7368187, -120.1278303)	Pole	N/A
66	6364 Greeley Hill Rd. Coulterville, CA	Pole	121785423
67	6364 Greeley Hill Rd. Coulterville, CA	Pole	80-5
68	3316 Chicharra Way Coulterville, CA	Pole	122140977
69	(37.7270689, -120.3132842)	Pole	120239658
70	10438 Violeta Way Coulterville, CA	Pole	120779179
71	10438 Violeta Way Coulterville, CA	Pole	120779166
72	3303 Rosa Ct. Coulterville, CA	Pole	121833371
73	(37.7161304, -120.3324879)	Pole	121789420
74	10363 Gusanillo Way Coulterville, CA	Pole	N/A
75	10284 Gusanillo Way Coulterville, CA	Pole	122139679
76	10288 Gusanillo Way Coulterville, CA	Pole	121500439
77	3473 Merced Falls Rd. Coulterville, CA	Pole	122134961
78	37.6893524, -120.3272123)	Pole	121503436
79	3299 CA-132 La Grange, CA	Pole	120238315
80	14370 Las Palmas Way La Grange, CA	Pole	121769311
81	2659 Pepito Dr. La Grange, CA	Pole	121500415
82	(37.6719695, -120.3216675)	Pole	122219748
83	14445 Potrero Way La Grange, CA	Pole	110097818
84	12994 Bonds Flat Rd. La Grange, CA	Pole	122134243
85	(37.6791651, -120.3622218)	Pole	N/A
86	2343 Jaime Way La Grange, CA	Pole	121779996
87	10339 Josefina Way La Grange, CA	Pole	121366837

Location #	Address/GPS Location	Structure Type	Structure #
88	23122 Ave 14 Madera, CA	Pole	N/A
89	(36.9528032, -120.1276147)	Pole	120065441
90	(36.9527788, -120.1266551)	Pole	N/A
91	(36.9527804, -120.1261988)	Pole	N/A
92	1559 Seneca Dr. Madera, CA	UG Handhole	N/A
93	1535 Seneca Dr. Madera, CA	UG Handhole	N/A
94	507 Seneca Dr. Madera, CA	UG Handhole	N/A
95	201 Mariposa St. Madera, CA	Pedestal	N/A
96	197 Mariposa St. Madera, CA	Pedestal	N/A
97	149 Mariposa St. Madera, CA	Pedestal	N/A
98	1024 Daulton Ave. Madera, CA	Pole	N/A
99	804 Merced St. Madera, CA	Pole	121007212
100	1026 E. Lincoln Ave. Madera, CA	Pole	N/A
101	16138 Raymond Rd. Madera, CA	Pedestal	N/A
102	16138 Raymond Rd. Madera, CA	Pole	6126
103	16110 Raymond Rd. Madera, CA	Pole	121051235
104	909 E. Kennedy St. Madera, CA	B-Box	N/A
105	Lake St. & Kennedy St. Madera, CA	Pole	110401162
106	907 E. Kennedy St. Madera, CA	Pole	N/A
107	909 E. Kennedy St. Madera, CA	Pole	120915176
108	925 E. Kennedy St. Madera, CA	Pole	120915076
109	17463 Road 26 Madera, CA	Pedestal	N/A
110	26020 Avenue 17 ½ Madera, CA	B-Box	N/A

Location #	Address/GPS Location	Structure Type	Structure #
111	16400 Fairview St. Madera, CA	Pedestal	N/A
112	17408 Brook Dr. Madera, CA	B-Box	N/A
113	17408 Brook Dr. Madera, CA	Pedestal	N/A
114	17431 Brook Dr. Madera, CA	Pedestal	N/A
115	260 N. 15th St. Chowchilla, CA	Pole	120258196
116	1409 Riverside Ave. Chowchilla, CA	Pole	120258195
117	1401 Riverside Ave. Chowchilla, CA	Pole	110476623
118	535 N. Tenth St. Chowchilla, CA	Pole	120879940
119	535 N. Tenth St. Chowchilla, CA	Pole	110432534
120	540 N. Tenth St. Chowchilla, CA	Pole	120879941
121	540 N. Sixth St. Chowchilla, CA	Pole	120879950
122	555 N. 5th St. Chowchilla, CA	Pole	120880226
123	413 Sonoma Ave. Chowchilla, CA	Pole	110248095
124	721 Lake Ave. Chowchilla, CA	Pole	120880303
125	715 Lake Ave. Chowchilla, CA	Pole	120880302
126	701 Lake Ave. Chowchilla, CA	Pole	120880301
127	340 N. 7th St. Chowchilla, CA	Pole	120014948
128	601 Robertson Blvd. Chowchilla, CA	Pole	120390233
129	123 S. 6th St. Chowchilla, CA	Pole	120390235
130	513 W. Robertson Blvd. Chowchilla, CA	Pole	120390236
131	505 Robertson Blvd. Chowchilla, CA	Pole	120390237
132	6999 Atwater Jordan Rd. Atwater, CA	Pedestal	N/A

Location #	Address/GPS Location	Structure Type	Structure #
133	(37.3311616, -120.6078914)	Pedestal	N/A
134	(37.3312114, -120.6069543)	Pole	120004821
135	1051 Commerce Ave. Atwater, CA	UG Vault	N/A
136	1575 Buller St. Atwater, CA	Pole	N/A
137	1590 Shaffer Rd. Atwater, CA	Pole	200
138	2947 Fifth St. Atwater, CA	UG Handhole	N/A
139	2950 Mardi Gras Ct. Atwater, CA	UG Handhole	N/A
140	2920 Mardi Gras Ct. Atwater, CA	UG Handhole	N/A
141	6382 Monica Way Atwater, CA	UG Handhole	N/A
142	7199 Doris Ave. Atwater, CA	Pedestal	N/A
143	6900 Vine Ave. Atwater, CA	Pedestal	N/A
144	(37.3821512, -120.6315686)	Pedestal	N/A

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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.*
>
> *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.*
>
> *A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the*

furnishing of safe, proper, and adequate service, the company shall follow the higher standard…"

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

Table 5: GO 95, Rule 31.1 Findings

Location #	Findings
18	Facilities need to be transferred to new pole.
28	Conductor was not securely attached to pole.
55	Facilities need to be transferred to new pole.
56	Facilities need to be transferred to new pole.
57	Facilities need to be transferred to new pole.
61	Broken ground wire attached to pole needs to be removed.
68	Old pole stump needs to be removed.
70	Facilities need to be transferred to new pole.
72	Facilities need to be transferred to new pole.
76	Junction box is missing a cover.
77	Facilities need to be transferred to new pole.
78	Facilities need to be transferred to new pole.
81	Facilities need to be transferred to new pole.
82	Conductor was not securely attached to pole.
86	Facilities need to be transferred to new pole.

Location #	Findings
87	Facilities need to be transferred to new pole.
119	Junction box was broken.

2. 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
11	There was an abandoned AT&T service drop.
13	There was an abandoned AT&T service drop.
115	There was an abandoned AT&T service drop. Service drop was removed in field.
127	There was an abandoned AT&T service drop.

3. GO 95, Rule 34, Foreign Attachments states:

"Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner's or owners' consent."

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

Table 7: GO 95, Rule 34 Findings

Location #	Findings
59	There was a foreign object attached to the pole.
67	There was a foreign object attached to the pole.

4. **GO 95, Rule 35, Vegetation Management** states in part:

"Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule."

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

Table 8: GO 95, Rule 35 Findings

Location #	Findings
15	There was vegetation grown into the messenger midspan. There is vegetation strain on the conductor.
32	There is vegetation strain on the conductor.
39	There is vegetation strain on the conductor.
118	There is vegetation strain on the conductor.

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

"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…"

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

Table 9: GO 95, Rule 37 Findings

Location #	Findings
20	There was a low hanging supply drop. Table 1 requires a minimum clearance of 10 feet for service drops above ground in areas accessible to pedestrians only.
46	There was a low hanging supply drop. Table 1 requires a minimum clearance of 10 feet for service drops above ground in areas accessible to pedestrians only.

6. **GO 95, Rule 38, Minimum Clearances 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, Case 8-15, inclusive..."

ESRB's finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 38 Finding

Location #	Finding
20	There was a terminal and conductor in contact with a guy wire. Table 2 requires a minimum clearance of 3 inches between communication conductors and guys and spans wires passing conductors supported on the same poles.

7. **GO 95, Rule 86.9, Guy Marker (Guy Guard)** states:

"A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more

than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."

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

Table 11: GO 95, Rule 86.9 Findings

Location #	Findings
14	Guy wire was missing a guy guard.
16	Guy guard on guy wire is broken.
48	Guy wire was missing a guy guard.
78	Guy wire was missing a guy guard.
81	Guy wire was missing a guy guard.

8. GO 95, Rule 84.7A, Climbing Space states:

"Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

The climbing space shall be maintained in the same position on the pole for minimum vertical distance of 4 feet above and below each conductor level through which it passes, excepting that where a cable is attached to a crossarm or a pole with the cable less than 9 or 15 inches from the center line of the pole supporting conductors on line arms (no buck arm construction involved) in accordance with the provisions of Rules 84.4–D1 or 87.4–C3, the 4 foot vertical distance may be reduced to not less than 3 feet.

The position of the climbing space shall not be shifted more than90 degrees around the pole within a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.

The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–A5."

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

Table 12: GO 95, Rule 84.7A Findings

Location #	Findings
119	Vegetation impedes climbing space.
136	Vegetation impedes climbing space.

9. 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 13:

Table 13: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
25	Riser was below 8 feet.
28	Riser was below 8 feet.
30	Riser was broken.
41	Riser was broken.
42	Conductor was uncovered at base of riser.
51	Conductor was not in riser.

Location #	Findings
66	Riser was below 8 feet.
82	Riser was missing for conductor along pole.
89	Conductor was not in riser.
102	Riser was below 8 feet.
122	Riser was broken.
130	Riser was broken.

10. GO 95, Rule 91.3-C, Stepping states:

> *"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps."*

ESRB's finding related to the above rule is listed in Table 14:

Table 14: GO 95, Rule 91.3-C Finding

Location #	Finding
115	There was a pole step below 8 feet.

11. GO 95, Rule 92.4-C(1)(a), Grounding, Material and Size states:

> *"The grounding conductor from each ground rod (ground electrode) to the base of the pole shall not be less than 1 foot below the surface of the ground."*

ESRB's finding related to the above rule is listed in

Table **15**:

Table 15: GO 95, Rule 92.4-C(1)(a) Finding

Location #	Finding
88	The ground rod was exposed above ground.

12. GO 128, Rule 17.1, Design, Construction and Maintenance states:

> *"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 16:

Table 16: GO 128, Rule 17.1 Findings

Location #	Findings
1	Vault lid was broken.
9	Vault lid was broken.
111	Pedestal was missing a cover.
132	Pedestal was broken.
133	Pedestal was missing a cover.

13. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

> "*Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity."*

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

Table **17**:

Table 17: GO 128, Rule 17.8 Findings

Location #	Findings
1	No mark of ownership on vault lid.
3	No mark of ownership on vault lid.
4	No mark of ownership on vault lid.
95	No mark of ownership on pedestal. Ownership label was added in field.
101	No mark of ownership on pedestal. Ownership label was added in field.
109	No mark of ownership on pedestal. Ownership label was added in field.
135	No mark of ownership on vault lid.
142	No mark of ownership on pedestal. Ownership label was added in field.
143	No mark of ownership on pedestal. Ownership label was added in field.
144	No mark of ownership on pedestal. Ownership label was added in field.

V. Observations

1. **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."

ESRB's findings related to the above rule are listed in Table 18:

Table 18: GO 95, Rule 18-A Findings

Location #	Findings
18	Cable TV conductor is in contact with AT&T line.
20	Electrical ground wire is exposed.
21	Electrical ground wire is exposed.
23	Cable TV riser is below 8 feet.
28	Cable TV conductor is not securely attached to the pole.
31	Cable TV conductor is not in riser.
31	Cable TV guy wire guard is missing on outermost guy wire.
38	Cable TV conductor is not covered by the riser.

39	There is vegetation strain on cable TV conductor.
45	Cable TV service drop is in contact with messenger and AT&T conductor.
106	Cable TV ground rod and ground wire are exposed.
107	Cable TV has an abandoned service drop.
116	Cable TV has an abandoned service drop.
131	Cable TV ground wire is exposed.