



Ross Johnson
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May 12, 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 Los Angeles Construction Region

Dear Mr. Daye,

The following is AT&T California's ("AT&T") response to your letter dated April 11, 2025 ("April Letter") regarding the Communication Infrastructure Provider Audit of AT&T Los Angeles Construction Region ("Los Angeles Audit") conducted from February 24-28, 2025.

The April Letter requested that we advise you of actions taken by AT&T to address alleged conditions identified during the Safety and Enforcement Division's Los Angeles Audit and requested a response by May 12, 2025.

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

Regards,

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

Ross Johnson
Director
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Enclosure:

AT&T's Response to the Los Angeles Audit

Cc:

Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Sultan Tipu, Utilities Engineer, CPUC

AT&T'S RESPONSE TO AUDIT RELATED TO
LA CONSTRUCTION REGION
CONDUCTED FEBRUARY 24-28, 2025

I. Records Review – Alleged Violations List

Records Review Alleged Violation #1: AT&T's records indicated that from 2018 to 2024, AT&T completed 5 overhead work orders past AT&T's scheduled due date for corrective action.

AT&T Response:

Without admitting that AT&T violated GO 95, Rule 18, AT&T will endeavor to complete work orders by the due date.

II. Field Inspection – Alleged Violations List

Field Inspection Alleged Violation #1a: AT&T's facilities on the following poles required maintenance:

- Pole 1491729E – the AT&T splice box fastener rings were abandoned.
- Pole 608916H - the "eye" of the AT&T down guy anchor attached the pole was buried.
- 4852663E – service drop is loose and not properly secured to pole.
- 1491732E – service drop not properly secured to the pole.

AT&T Response:

- **Pole 1491729E: Ticket 1577821 was created for the alleged finding with a due date of 11/1/2027.**
- **Pole 608916H is not a listed location and there was no record of visiting that pole on the audit. If the auditor meant Pole 608918H: Ticket 1687633 was created for the alleged finding with a due date of 5/7/2030.**
- **Pole 4852663E: Ticket 1687633 was created for the alleged finding with a due date of 5/6/2030.**
- **Pole 1491732E: Ticket 1687947 was created for the alleged finding with a due date of 5/6/2030.**

Alleged Field Inspection Violation #1b: Missing or damaged pole tags were observed on each of the following poles:

- | | | | |
|------------|-----------|-----------------|------------|
| • 4944845E | • P7NTP | • 1325 Franklin | • 4702300E |
| • 1491709E | • 679297H | • 744157H | |

AT&T Response:

- **Pole 4944845E: issue has been resolved.**
- **Pole P7NTP: Ticket 1687628 was created for the alleged finding with a due date of 5/6/2026.**
- **Pole 1325 Franklin: Ticket 1687627 was created for the alleged finding with a due date of 5/6/2026.**
- **Pole 4702300E: Ticket 1687630 was created for the alleged finding with a due date of**

5/6/2026.

- Pole 1491709E is not on the location list for the audit, and AT&T has no record of visiting this pole during the audit. If the auditor meant Pole 1491909E, the issue was resolved.
- Pole 679297H: Ticket 1687626 was created for the alleged finding with a due date of 5/6/2026.
- Pole 744157H: Ticket 1687629 was created for the alleged finding with a due date of 5/6/2026.

Alleged Field Inspection Violation #1c: Missing or damaged visibility strips were observed on each of the following poles:

- 2006380E
- 4800760E

AT&T Response:

- Pole 2006380E: Ticket 1101185 was created for the alleged finding with a due date of 11/1/2027.
- Pole 4800760E is not a listed location for the audit, and AT&T has no record of visiting this pole during the audit. If the auditor meant Pole 48007604E: Ticket 1313266 was created for the alleged finding with a due date of 4/12/2028.

Alleged Field Inspection Violation #2: Permanently abandoned service drops on or near the following poles should be removed:

- | | | | |
|------------|------------|------------|------------|
| • 3960 | • 2365063E | • 4926588E | • 1492395E |
| • 2365061E | • 1492838E | • 1491732E | • 1158882E |
| • 2365062E | • 1492839E | • 2167576E | |

AT&T Response:

- Pole 3960 is not a listed location for the audit, and AT&T has no record of visiting this pole during the audit. If the auditor meant Pole 39670: Ticket 1687385 was created for the alleged finding with a due date of 5/6/2030.
- Pole 2365063E: Ticket 1577813 was created for the alleged finding with a due date of 10/31/2027.
- Pole 4926588E: Ticket 1313270 was created for the alleged finding with a due date of 4/12/2028.
- Pole 1492395E: Ticket 1687945 was created for the alleged finding with a due date of 5/6/2028.
- Pole 2365061E: Ticket 1687386 was created for the alleged finding with a due date of 5/6/2030.
- Pole 1492838E: Ticket 1577810 was created for the alleged finding with a due date of 11/1/2027.
- Pole 1491732E: Ticket 1687947 was created for the alleged finding with a due date of 5/6/2030.
- Pole 1158882E: Ticket 1687627 was created for the alleged finding with a due date of 5/6/2030.
- Pole 2365062E: Ticket 1313974 was created for the alleged finding with a due date of 4/10/2026.
- Pole 1492839E: Ticket 1313979 was created for the alleged finding with a due date of 4/11/2026.
- Pole 2167576E: Ticket 1687939 was created for the alleged finding with a due date of

5/6/2030.

Alleged Field Inspection Violation #3a: The following AT&T facilities had less than 12 inches of vertical clearance from third-party communications conductors:

- Pole 1492846E: an AT&T conductor was in contact with a third-party communications conductor.
- Pole X8634E an AT&T conductor was contacting a third-party communications conductor.
- Pole 1158881E: an AT&T conductor was in contact with a “terminal box” on a third-party communications conductor.
- Pole 608917H: an AT&T conductor was in contact with a third-party communications conductor.

AT&T Response:

- **Pole 1492846E: Ticket 1687943 was created for the alleged finding with a due date of 5/6/2030.**
- **Pole X8634E: Ticket 1687942 was created for the alleged finding with a due date of 5/6/2030.**
- **Pole 1158881E: Ticket 1687631 was created for the alleged finding with a due date of 5/6/2030.**
- **Pole 608917H: Ticket 1687635 was created for the alleged finding with a due date of 5/6/2030.**

Alleged Field Inspection Violation #3b: Pole 492658E and 2365076E: AT&T conductors had less than 12 inches of vertical clearance from a third-party communications conductor

AT&T Response:

- **Pole 492658E is not a listed location for the audit, and AT&T has no record of visiting this pole during the audit. If the auditor meant Pole 4926588E: Ticket 1687384 was created for the alleged finding with a due date of 5/6/2030.**
- **Pole 2365076E is not a listed location for the audit, and AT&T has no record of visiting this pole during the audit. If the auditor meant Pole 2365066E: Ticket 1687637 was created for the alleged finding with a due date of 5/6/2030.**

Alleged Field Inspection Violation #4: The marker (guard) on the down guy wire supporting pole number 149783E was missing.

AT&T Response:

Pole 149783E is not a listed location for the audit, and AT&T has no record of visiting this pole during the audit. If the auditor meant Pole 1491738E: Ticket 1687383 was created for the alleged finding with a due date of 5/6/2030.

Alleged Field Inspection Violation #5: The handhole cover located at 1608 Bruins Street, W. Athens, LA, was not secured.

AT&T Response:

Ticket 1686947 was created for the alleged finding with a due date of 5/6/2026.

Alleged Field Inspection Violation #6: The handhole at 1655 Bruins Street, W. Athens, LA was not sealed to mitigate water intrusion.

AT&T Response:

Ticket 1686945 was created for the alleged finding with a due date of 5/6/2026.