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June 20, 2025

Via Email  
Rickey Tse  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Subject: Communication Infrastructure Provider (CIP) Audit of San Joaquin, Stanislaus, and Calaveras Counties

Dear Mr. Tse,

The following is AT&T California's ("AT&T") response to your letter dated May 20, 2025 ("May Letter") regarding the audit of AT&T's San Joaquin, Stanislaus, and Calaveras Counties conducted from March 24 to March 28, 2025 ("March Audit").

The May Letter requested that we advise you of actions taken by AT&T to address alleged conditions identified during the March Audit and requested a response by June 20, 2025.

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

Regards,

*Saira Pasha*

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Enclosure:

AT&T's Response to the March Audit

Cc:

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**Alleged Records Violation #1.** AT&T provided no procedure to ESRB detailing how underground assets are inspected thoroughly and completely as required by GO 128, Rule 17.2. AT&T states that it inspects its underground facilities, and that its procedures and practices are consistent across the telecommunications industry, as well as the requirements of California General Orders. However, AT&T provided no procedure to support their practices and ensure they are in compliance with GO 128.

**AT&T Response:** As previously stated, to the extent the ESRB requires a written maintenance program or procedural manual for such inspections, GO 128 does not require that of the communications systems owner. AT&T employees regularly inspect underground systems and facilities during work to ensure they are well-maintained and meet GO 128 standards.

**Alleged Records Violation #2a:** ESRB's review of AT&T's work orders from January 2020 through January 2025 found that AT&T had 427 out of 3,605 (11.8%) pending overhead work orders that were overdue and 425 out of 1609 (26.4%) closed overhead work orders that were completed late. AT&T also had 180 out of 1,403 (12.8%) overhead work orders that were cancelled 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.

Hazard Level	Late-Pending Work Orders[]	Late-Closed Work Orders	Late-Cancelled Work Orders	Total Late Work Orders
1	0	6	2	8
2	311	56	133	500
2a	36	3	6	45
2b	61	360	32	453
2c	19	0	7	26
3	0	0	0	0
<b>Total</b>	427	425	180	<b>1,032</b>

**AT&T Response:** Without admitting that AT&T violated GO 95, Rule 18, the information AT&T produced in response to the pre-audit data request appears to indicate that 427 tickets are pending and 425 were closed; however, that 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. That said, AT&T has been reviewing and is continuing to review each of the 427 work orders identified as past due to determine whether the work order should be cancelled/invalidated (meaning they will be closed out) or requires work to be performed in the field. To date, 65 have been closed out. AT&T intends to complete current and past due work orders that require work to be performed in the field.

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**Alleged Records Violation #2b:** The most overdue pending work orders are listed in Table 1B below:

Hazard Level	Most Overdue Work Orders (Package ID)	Number of Days Past Assigned Due Date
1	n/a	n/a
2	569603	688
2a	1022980	775
2b	1022435	957
2c	1022876	956
3	n/a	n/a

**AT&T Response:**

- Work order #569603: sent to AT&T's Engineering Department for the pole equipment to be transferred and the pole to be removed. They have requested documentation from PGE, barring any unforeseen situations, the pole should be transferred and removed by 8/30/2025.
- Work order #1022980: Scheduled to be completed by 6/27/2025.
- Work order #1022435: Scheduled to be completed by 6/27/2025.
- Work order #1022876: No issues found and ticket closed.

**Alleged Records Violation #3:** ESRB's review of AT&T's work orders from January 2020 through January 2025 found that AT&T had 22 out of 179 (12.3%) closed underground work orders that were completed late. Late-closed work orders are work orders that were completed past their assigned due date. AT&T had no pending underground work orders that were overdue.

**AT&T Response:** Without admitting that AT&T violated GO 128, Rule 17.1, the date a ticket was closed is not necessarily indicative of when any corrective action was completed. To the extent any corrective action was completed past the assigned due date, AT&T will endeavor to meet assigned due dates moving forward.

**Alleged Records Violation #4:** ESRB reviewed AT&T's San Joaquin, Stanislaus, and Calaveras County Region patrol and detailed inspection records from January 2020 to January 2025 for the interval between inspections and the period since the last inspection. ESRB found a total of 181 out of 726 (24.9%) patrols and inspections that were late or are past due. Table 3 shows the distribution areas ("DA") within the audit area with the most overdue inspections in the past 5 years based on the cycles defined by Rule 80.1A(1).

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**Table 3: Most Overdue Inspections**

UN_DA_NA	CLLI_ID	Fire Tier	Initial Patrol or Detailed Inspection	Following Patrol or Detailed Inspection	Days Late
NAI641101	ARNLCA11	3	9/10/2020	12/16/2021	97
NAI2601	ARNLCA11	3	9/15/2020	12/17/2021	93
NAI420301	ARNLCA11	3	9/10/2020	12/12/2021	93
NAI641201	ARNLCA11	3	9/9/2020	12/9/2021	81

**AT&T Response:** Without admitting that AT&T violated GO 95, Rule 80.1-A (1), AT&T will endeavor to meet due dates moving forward.

**Alleged Records Violation #5:** ESRB's analysis of AT&T's Work Order History identified missing personnel who performed the inspections in the "FORCE\_TECH" and "FLD\_FORCE\_TECH" fields for the overhead completed work orders, the underground open work orders, and the underground completed work orders. GO 95 requires utilities to maintain records for 10 years, and AT&T has incomplete and missing information regarding the personnel who performed each inspection and the personnel who performed each corrective action in the Work Order History provided to ESRB.

Location	Findings
18	The terminal splice box has loose wires hanging out and needs to be resealed.
23	The pole has a missing lashing wire between Location 22 and Location 23.
49	The pole is damaged and needs replacement.
50	The terminal splice box has loose wires hanging out and needs to be resealed.
52	The remaining buddy pole needs to be removed.
55	The pole has an incomplete facilities transfer.
58	The pole has an incomplete facilities transfer and the remaining buddy pole needs to be removed.
68	The pole has a loose lashing wire.
75	The pole has a loose drop that needs to be tightened. AT&T has existing Ticket #100757144 to replace the terminal splice box, and the loose drop will be resolved with the replacement.
86	The pole has a loose lashing wire between Location 85 and Location 86.
95	The pole has a loose lashing wire between Location 94 and Location 95.
98	The pole has a loose lashing wire. The animal guard is loose and hanging down between Location 98 and Location 99.
105	The terminal splice box has loose wires hanging out and needs to be resealed.
112	The pole has a loose lashing wire between Location 111 and Location 112.
112	The terminal splice box has loose wires hanging out and needs to be resealed.
128	The animal guard is loose and hanging down.
132	The pole has an incomplete facilities transfer.
139	The repeater case is unattached to the pole and hanging low and accessible to the public.

**AT&T Response:** AT&T pole inspection work has been contracted to Osmose Utilities Services, Inc. since 2019. A list of their inspectors has been provided with this response. For the corrective actions, if

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the AT&T personnel ID that identifies the AT&T employee involved in resolving the issue or oversaw the corrective action is not listed in either the "FORCE\_TECH" or "FLD\_FORCE\_TECH" fields, this information may also be listed in the "FLD\_COMP\_NOTE" field.

**Alleged Field Violations #1: GO 95, Rule 31.1, Design, Construction and Maintenance**

**Table 4: GO 95, Rule 31.1 Findings**

Location	Findings
18	The terminal splice box has loose wires hanging out and needs to be resealed.
23	The pole has a missing lashing wire between Location 22 and Location 23.
49	The pole is damaged and needs replacement.
50	The terminal splice box has loose wires hanging out and needs to be resealed.
52	The remaining buddy pole needs to be removed.
55	The pole has an incomplete facilities transfer.
58	The pole has an incomplete facilities transfer and the remaining buddy pole needs to be removed.
68	The pole has a loose lashing wire.
75	The pole has a loose drop that needs to be tightened. AT&T has existing Ticket #100757144 to replace the terminal splice box, and the loose drop will be resolved with the replacement.
86	The pole has a loose lashing wire between Location 85 and Location 86.
95	The pole has a loose lashing wire between Location 94 and Location 95.
98	The pole has a loose lashing wire. The animal guard is loose and hanging down between Location 98 and Location 99.
105	The terminal splice box has loose wires hanging out and needs to be resealed.
112	The pole has a loose lashing wire between Location 111 and Location 112.
112	The terminal splice box has loose wires hanging out and needs to be resealed.
128	The animal guard is loose and hanging down.
132	The pole has an incomplete facilities transfer.
139	The repeater case is unattached to the pole and hanging low and accessible to the public.

**AT&T Response:**

- Location #18: Ticket 1710536 was created for the alleged finding with a due date of 6/16/2030.
- Location #23: Ticket 1710535 was created for the alleged finding with a due date of 6/18/2030.
- Location #49: Ticket 1710544 was created for the alleged and it was completed on 6/18/2025.
- Location #50: Ticket 1710718 was created for the alleged finding with a due date of 6/18/2030.
- Location #52: Ticket 1710725 was created for the alleged finding with a due date of 6/18/2030.
- Location #55: Ticket 1496543 was created for the alleged finding with a due date of 5/16/2029.
- Location #58: Ticket 1496470 was created for the alleged finding with a due date of 5/16/2029.
- Location #68: Ticket 1710715 was created for the alleged finding with a due date of 6/18/2030.
- Location #75: Ticket 1398323 was created for the alleged finding with a due date of 11/28/2028.
- Location #86: Ticket 1710716 was created for the alleged finding with a due date of 6/18/2030.
- Location #95: Ticket 1709963 was created for the alleged finding with a due date of 6/16/2030.

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- Location #98: Ticket 1709964 was created for the alleged finding with a due date of 6/16/2030.
- Location #105: Ticket 1709786 was created for the alleged finding with a due date of 6/16/2030.
- Location #112: Ticket 1710714 was created for the alleged finding with a due date of 6/18/2030.
- Location #112: Ticket 1710732 was created for the alleged finding with a due date of 6/18/2028.
- Location #128: Ticket 1709640 was created for the alleged finding with a due date of 6/16/2030.
- Location #132: Ticket 1710538 was created for the alleged finding with a due date of 6/18/2030.
- Location #139: Ticket 1710534 was created for the alleged finding with a due date of 6/18/2030.

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**Alleged Filed Inspection Violation #2: GO 95, Rule 31.6, Abandoned Lines**

**Table 5: GO 95, Rule 31.6 Findings**

<b>Location</b>	<b>Findings</b>
<b>8</b>	The pole has two abandoned drops that need removal.
<b>64</b>	The pole has an abandoned drop that needs removal.
<b>69</b>	The pole has an abandoned drop that needs removal.
<b>82</b>	The pole has abandoned drops that need removal.
<b>84</b>	The pole has abandoned drops and communication lines that need removal. AT&T fixed this issue in the field.
<b>86</b>	The pole has an abandoned drop that needs removal.
<b>90</b>	The pole has two abandoned drops that need removal.
<b>100</b>	The pole has an abandoned drop that needs removal.
<b>103</b>	The pole has an abandoned drop that needs removal.
<b>105</b>	The pole has an abandoned drop that needs removal between Location 104 and Location 105.
<b>132</b>	The pole has an abandoned drop that needs removal.

**AT&T Response:**

- Location #8: Ticket 1710078 was created for the alleged finding with a due date of 6/17/2030.
- Location #64: Ticket 1710077 was created for the alleged finding with a due date of 6/17/2030.
- Location #69: Ticket 1710719 was created for the alleged finding with a due date of 6/18/2030.
- Location #82: Ticket 1710710 was created for the alleged finding with a due date of 6/18/2030.
- Location #86: Ticket 1710708 was created for the alleged finding with a due date of 6/18/2030.
- Location #90: Ticket 1710709 was created for the alleged finding with a due date of 6/18/2030.
- Location #100: Resolved in the field on 3/27/2025.
- Location #103: Ticket 1709785 was created for the alleged finding with a due date of 6/18/2030.
- Location #105: Ticket 1709786 was created for the alleged finding with a due date of 6/16/2030.
- Location #132: Ticket 1710711 was created for the alleged finding with a due date of 6/18/2030.

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**Alleged Filed Inspection Violation #3: GO 95, Rule 35, Vegetation Management**

**Table 6: GO 95, Rule 35 Findings**

<b>Location</b>	<b>Findings</b>
<b>55</b>	Vegetation is causing strain on the communication lines.
<b>57</b>	Vegetation is causing strain and abrasion on the communication lines between Locations 56 and Location 57.
<b>75</b>	Vegetation is causing strain and abrasion on the communication lines between Locations 74 and Location 75. AT&T has existing Ticket #100469858 for this issue.
<b>80</b>	Vegetation is causing strain on the communication drop.

**AT&T Response:**

- Location #55: Ticket 1710706 was created for the alleged finding with a due date of 12/18/2025.
- Location #57: Ticket 1710707 was created for the alleged finding with a due date of 12/18/2025.
- Location #75: Ticket 1710198 was created for the alleged finding with a due date of 6/18/2028.
- Location #80: Ticket 1709788 was created for the alleged finding with a due date of 6/16/2030.

**Alleged Filed Inspection Violation #4: GO 95, Rule 38, Minimum Clearance of Wires from Other Wires**

**Table 7: GO 95, Rule 38 Findings**

<b>Location</b>	<b>Findings</b>
<b>14</b>	The conductors are in contact with cable facilities between Location 14 and Location 15.
<b>19</b>	The drop is in contact with other utility facilities.
<b>104</b>	The drop is in contact with other utility facilities.
<b>127</b>	The communication conductor is in contact with the power, cable, and AT&T down guy wires above the insulators.
<b>128</b>	The communication conductor is in contact with the cable and AT&T down guy wires.
<b>133</b>	The terminal splice box and associated lines are in contact with other utility facilities.

**AT&T Response:**

- Location #14: Ticket 1710198 was created for the alleged finding with a due date of 6/17/2028.
- Location #19: Ticket 1710543 was created for the alleged finding with a due date of 6/18/2030.
- Location #104: Ticket 1709787 was created for the alleged finding with a due date of 6/16/2030.
- Location #127: Ticket 1710713 was created for the alleged finding with a due date of 6/18/2030.

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- Location #128: Ticket 1709784 was created for the alleged finding with a due date of 12/16/2025.
- Location #133: Ticket 1710542 was created for the alleged finding with a due date of 6/18/2030.

**Alleged Filed Inspection Violation #5: GO 95, Rule 84.6-B, Ground Wires**

**Table 8: GO 95, Rule 84.6-B Findings**

Location	Findings
77	The vertical ground wire is exposed, and the protective moulding cover is detached from the pole.
84	The vertical ground wire is exposed, and the protective moulding cover is damaged.
91	The vertical ground wire is exposed, and the protective moulding cover is missing.
108	The vertical ground wire is exposed, and the protective moulding cover is detached from the pole.

**AT&T Response:**

- Location #77: Ticket 1019818 has been escalated and is scheduled to be completed by 7/15/2025.
- Location #84: Ticket 1710736 was created for the alleged finding with a due date of 6/18/2028.
- Location #91: Ticket 1710735 was created for the alleged finding with a due date of 6/18/2028.
- Location #108: Ticket 1709791 was created for the alleged finding with a due date of 6/18/2028.

**Alleged Filed Inspection Violation #6: GO 95, Rule 86.2, Guys, Use**

Location	Findings
17	The down guy is unattached and hanging loose with no anchor.
19	The anchor down guy is slack and contacting other guy wire.
27	The anchor down guy is slack.
50	The anchor down guy is slack.
61	The anchor down guy is slack.
63	The anchor down guy is slack.
73	The anchor down guy is slack with a damaged anchor. AT&T has existing Ticket # 100469965 for the damaged anchor.
83	The anchor down guy is slack.

**AT&T Response:**

- Location #17: Ticket 1680603 was created for the alleged finding with a due date of 03/20/2026.
- Location #19: Ticket 1710537 was created for the alleged finding with a due date of 6/18/2030.
- Location #27: Ticket 518383 has been escalated and is scheduled to be completed by 7/15/2025.
- Location #50: Ticket 1710720 was created for the alleged finding with a due date of 6/18/2030.
- Location #61: Ticket 1710721 was created for the alleged finding with a due date of 6/18/2030.
- Location #63: Ticket 1710722 was created for the alleged finding with a due date of 6/18/2030.
- Location #73: Ticket 1019708 was created for the alleged finding with a due date of 11/21/2026.
- Location #83: Ticket 1710723 was created for the alleged finding with a due date of 6/18/2030.

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**Alleged Filed Inspection Violation #7: GO 95, Rule 86.7-B, Location of Sectionalizing Insulators, Anchor Guys**

Location	Findings
126	Vegetation above the down guy insulator is contacting and grounding the anchor guy.

**AT&T Response:**

- Location #126: Ticket 1710712 was created for the alleged finding with a due date of 6/18/2030.

**Alleged Filed Inspection Violation #8: GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground**

Location	Findings
29	The riser guard is missing and exposing the communication drops.
34	The riser guard is less than 8 feet.
85	The riser guard is less than 8 feet.
96	The riser guard is not securely attached to the pole and has a gap making the facilities accessible to the public.
100	The riser guard is missing and exposing the communication drops.
104	The riser guard is not securely attached to the pole.

**AT&T Response:**

- Location #29: Ticket 1017272 was created for the alleged finding with a due date of 12/15/2026.
- Location #34: Ticket 1710724 was created for the alleged finding with a due date of 6/18/2030.
- Location #85: Ticket 1710734 was created for the alleged finding with a due date of 6/16/2028.
- Location #96: Ticket 1709972 was created for the alleged finding with a due date of 6/18/2028.
- Location #100: Resolved in the field on 3/27/2025.
- Location #104: Ticket 1709790 was created for the alleged finding with a due date of 6/18/2028.

**Alleged Filed Inspection Violation #9: GO 128, Rule 17.1, Design, Construction and Maintenance**

Location	Findings
141	The pedestal grounding wire needs to be stripped for ground-to-ground contact with the grounding rod.
144	The pedestal grounding wire needs to be stripped for ground-to-ground contact with the grounding rod.
149	The pedestal enclosure is jammed and cannot be accessed.
158	The vault lid is stuck with a damaged interior box and the enclosure needs replacement.

**AT&T Response:**

- Location #141: Ticket 1710524 was created for the alleged finding with a due date of 6/18/2026.
- Location #144: Ticket 1710523 was created for the alleged finding with a due date of 6/18/2026.
- Location #149: Ticket 1710522 was created for the alleged finding with a due date of 6/18/2026.
- Location #158: Ticket 1710521 was created for the alleged finding with a due date of 6/18/2026.

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**Alleged Filed Inspection Violation #10: GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self- contained Surface-mounted Equipment Enclosures**

Location	Findings
1	The handhold is missing an ownership marking.
2	The handhold is missing an ownership marking.
3	The vault is missing an ownership marking.
4	The vault is missing an ownership marking.
5	The handhold is missing an ownership marking.
40	The handhold is missing an ownership marking.
43	The pedestal is missing an ownership marking.
44	The handhold is missing an ownership marking.
102	The pedestal is missing an ownership marking. AT&T fixed this issue in the field.
115	The vault is missing an ownership marking.
117	The vault is missing an ownership marking.
118	The vault is missing an ownership marking.
119	The vault is missing an ownership marking.

**AT&T Response:**

- Location #1: Ticket 1584572 was created for the alleged finding with a due date of 6/18/2026.
- Location #2: Ticket 1710069 was created for the alleged finding with a due date of 6/18/2026.
- Location #3: Ticket 1710070 was created for the alleged finding with a due date of 6/18/2026.
- Location #4: Ticket 1710071 was created for the alleged finding with a due date of 6/18/2026.
- Location #5: Ticket 1710072 was created for the alleged finding with a due date of 6/18/2026.
- Location #40: Ticket 1710639 was created for the alleged finding with a due date of 6/18/2026.
- Location #43: Ticket 1710640 was created for the alleged finding with a due date of 6/18/2026.
- Location #44: Ticket 1710641 was created for the alleged finding with a due date of 6/18/2026.
- Location #102: Resolved in the field on 3/27/2025.
- Location #115: Ticket 1709997 was created for the alleged finding with a due date of 6/18/2026.
- Location #117: Ticket 1709998 was created for the alleged finding with a due date of 6/18/2026.
- Location #118: Ticket 1710015 was created for the alleged finding with a due date of 6/18/2026.
- Location #119: Ticket 1709996 was created for the alleged finding with a due date of 6/18/2026.

**Observations:**

**Table 14: Third-Party Observations**

Location	Observations
8	Cable has unsecured lines in contact with other utility facilities.
9	Cable has a loose drop contacting other utility facilities.
10	Cable has a missing riser guard and a loose drop unsecured to the pole.
15	Cable has an abandoned drop and low hanging lines in contact with other utility facilities.
17	Cable has an unattached down guy wire hanging loose.

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19	Cable has a loose drop contacting other utility facilities.
36	Power has an abandoned cut ground wire.
38	Power has a damaged pole with loose visibility strips, a damaged ground wire, and damaged ground wire moulding.
50	Power has a slack span guy and a guy wire contacting other utility guy wires.
54	Cable has a missing riser guard.
57	Cable has loose lashing wire causing contact with other utility facilities.
58	Cable has a loose drop contacting other utility facilities and an incomplete pole transfer.
63	Cable has vegetation above the down guy insulator is contacting and grounding the anchor guy.
69	Cable has an exposed ground wire with broken ground moulding.
80	Cable has an abandoned drop.
83	Power has a slack anchor down guy, which is causing the pole to lean.
85	Power has a low pole step.
104	Cable has a low drop to 110 I Street with insufficient clearance.
105	Cable has an abandoned drop.
108	Cable has a broken lashing wire and an exposed ground wire.
125	Cable has vegetation causing strain and abrasion on their facilities.
126	Cable has vegetation above the down guy insulator is contacting and grounding the anchor guy.
127	Cable has a loose drop contacting other utility facilities.
131	Cable has an abandoned drop.
133	Cable has a low hanging drop with insufficient clearance.
136	Cable has a loose drop contacting other utility facilities.
138	Cable has a loose drop contacting secondary power lines.
139	Cable has a loose drop contacting and wrapped around other utility facilities.

**AT&T Response:** Third Party notification will be sent for the alleged observations.