

May 22, 2025

Rickey Tse, P.E.

Program and Project supervisor

Safety and Enforcement Division

California Public Utilities Commission

Subject: Communication Infrastructure Provider (CIP) Audit of Horizon Cable TV

Dear Rickey Tse,

I am writing to address the recent audit conducted from January 21 to January 24, 2025, during which several infractions were noted within your department. The response from Horizon regarding the audit findings is attached. I apologize for the delay in addressing this matter.

Sincerely,

Kevin Daniel President

Horizon Cable TV

The Following is the response by Horizon Cable TV to the Communication Infrastructure Provider (CIP) Audit conducted from January 21 through January 24,2025.

The following infractions were noted during the audit:

Records Violations:

- 1. General Order 95, Rule 18-A, Resolution of Potential Violation of GO 95 and Safety Hazards
- 2. General Order 95, 18-B(1), Maintenance Programs

Action taken to address Record Violation 1 & 2

Horizon will integrate into its maintenance program issues found involving third party companies during its inspections. All notifications received and sent will be recorded and maintained for 10 years.

Horizon also will integrate into its maintenance program due dates (months/years) for issue found. This will ensure problems are corrected in the appropriate time frame along with the priority levels.

3. Records Violations: General Order 95, Rule 80.1-A(4)

Action taken to address Record Violation 3

Horizon will modify its inspection records to include all patrols conducted with records of needed action, the personnel performing the inspection, the date and description of corrective action taken. The records will even include remarks if no corrective action was needed. All records to be kept for 10 years.

• Field Inspection Violations:

1 Field Inspection Violations: GO 95, Rule 31.1 Design Construction and Maintenance.

Locations 22,34,35,36,50,53,62,66.

Action taken to address Field Violation 1

- 22 -This has an existing work order to resolve.
- 34-Issue has been added to our maintenance list.
- 35-This has an existing work order to resolve.

- 36- This has an existing work order to resolve.
- 50- Issue has been added to our maintenance list.
- 53- Issue has been added to our maintenance list.
- 62- Issue has been added to our maintenance list.
- 66- Issue has been added to our maintenance list.

2 GO 95, Rule 31.6 Abandoned Lines.

Location 116

Action taken to address Field Violation 2

116- Issue has been added to our maintenance list.

3 GO 95, Rule 35, Vegetation Management.

Locations 25,36,70.

Action taken to address Field Violation 3

- 25-Issue has been added to our maintenance list.
- 36-Issue has been added to our maintenance list.
- 70-Issue has been added to our maintenance list.

4 GO 95, Rule 38, Minimum Clearance of Wires from Other Wires

Locations 16,20,27,36,42,77,79,111,113

Action taken to address Field Violation 4

- 16-Issue resolved
- 20-Issue resolved.
- 27- Issue has been added to our maintenance list.
- 36-A work order has been issued for this issue.
- 42- Issue has been added to our maintenance list.
- 77- Issue has been added to our maintenance list.
- 79- Issue has been added to our maintenance list.
- 111- Issue has been added to our maintenance list.
- 113- Issue has been added to our maintenance list.

5 GO95, Rule 84.6-B Ground Wires

Location 122

Action taken to address Field Violation 5

The issue has been added to our maintenance list.

6 GO 95, Rule 84.8-C Service Drops, Clearances above Ground and Buildings Locations 36,51.

Action taken to address Field Violation 6

- 36- Work order has been issued for work.
- 51- Issue has been added to our maintenance list

7 GO 95, Rule 86.2 Guys, Use

Locations 47,53,74,124

Action taken to address Field Violation 7

- 47-Issue fixed.
- 53-Issue has been added to our maintenance list.
- 74- Issue has been added to our maintenance list.
- 124- Issue has been added to our maintenance list.

8 GO 95, Rule 86.7-B Location of Sectionalizing Insulators, Anchor GuysLocation 29

Action taken to address Field Violation 8

29- Issue has been added to our maintenance list.

9 GO 95, Rule 86.9, Guy Marker (Guy Guard)

Locations 15,124

Action taken to address Field Violation 9

- 15-Issue has been added to our maintenance list.
- 124- Issue has been added to our maintenance list.

10 GO 95, Rule 87.7-D(1), Risers, Covered from Ground level to 8 feet Location 86,108

Action taken to address Field Violation 10

- 86- Issue has been added to our maintenance list.
- 108- Issue has been added to our maintenance list.

11 GO 128, Rule 17.1. Design, Construction and Maintenance

Location 1

Action taken to address Field Violation 11

1- Issue has been added to our maintenance list.

12 GO 128, Rule 17.8 Identification of Manholes, Handholes, Subsurface

Locations

1,2,3,4,5,6,7,8,9,55,87,88,89,90,91,92,93,94,95,96,97,98,99,100,101,102,103.

Action taken to address Field Violation 12

All locations in violation 12 will be added to our maintenance list and will all be identified with Horizon's name.

Observations

1 GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered... GO 95, Rule 18-A, Resolution of Potential Violations of GO 95 and Safety Hazards

Locations

11,12,12,19,26,27,28,31,34,36,37,39,48,50,53,58,60,62,63,66,75,85,86,113,114,11 5,116,124.

Action taken to address Observations 1

Horizon takes safety hazards very seriously. As defined in Rule 18 "For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property". Horizon has always notified a utility of any situation that it felt was a threat to human life. However, Horizon going forward will now log these incidents and properly notify the other companies of the hazard and retain the notifications for the required time of 10 years.