

VIA ELECTRONIC DELIVERY

May 15, 2025

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch, Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**Re: CA2025-1266 ESRB CIP Audit
Comcast's Confidential Response to ESRB CIP Audit Findings of Comcast's Delta
Valley Region**

Dear Mr. Tse:

Comcast Phone of California, LLC (U-5698-C) ("Comcast"), hereby provides its response to the Electric Safety & Reliability Branch's ("ESRB") April 16, 2025 letter and report regarding the Communications Infrastructure Provider ("CIP") Audit Findings of Comcast's Delta Valley Region ("CIP Audit Report"). In Confidential Attachment 1, Comcast responds to the findings in the CIP Audit Report and describes the corrective measures it has taken, is currently taking, or soon will take to remedy the General Order ("G.O.") 95 and G.O. 128 non-conformances identified therein. The CIP Audit Report states that Comcast's response will be placed on the California Public Utility Commission's ("Commission") website and requests a public version of the response if information contained therein is confidential. Because Comcast's response is provided in connection with an audit, the entirety of Comcast's response is subject to confidential treatment under the California Public Records Act ("CPRA"), and therefore Comcast has fully redacted the public version of its response.

Comcast will upload responsive confidential documents via the Commission's secure Kiteworks FTP today in response to the CIP Audit Report. Comcast's request for confidential treatment of these documents is set forth below.

REQUEST FOR CONFIDENTIAL TREATMENT

Comcast has enclosed information under seal for which it requests confidential treatment, including: confidential business practices concerning the inspection, maintenance, and repair of its overhead and underground facilities, and records for the repair of certain facilities (collectively, the "Confidential Information").

Comcast requests that the Commission afford confidential treatment to the Confidential Information pursuant to the CPRA and Cal. Pub. Util. Code § 583, consistent with the requirements of G.O. 66-D. Section 3.2 of G.O. 66-D requires requesters seeking confidential treatment of non-public information outside of a formal proceeding to: (i) designate information as confidential; (ii) specify the basis for confidential treatment under the CPRA or Commission order; (iii) provide a declaration in support of confidential treatment; and (iv) provide contact information of those responsible to monitor and respond to Commission communications regarding the submitted information. This submission addresses all requirements of G.O. 66-D to seek confidential treatment.

I. DESIGNATION OF THE INFORMATION AS CONFIDENTIAL

Comcast marked each document containing Confidential Information with a header and/or footer indicating it is confidential. Exhibits submitted herewith containing Confidential Information have been designated as “Confidential” in their file name and title, where possible.

II. LEGAL BASES FOR CONFIDENTIAL TREATMENT

A. First Legal Basis for Confidential Treatment—Audit/Investigation Records under State and Federal Law

The CPRA protects against disclosure of information protected under state and federal law.¹ Specifically, the CPRA protects against the disclosure of confidential records of audits and investigations.² Federal law also protects against disclosure of “[i]nformation submitted in connection with audits, investigations and examination of records.”³ The Confidential Information submitted herewith is part of an ESRB audit of Comcast’s communications infrastructure in the Delta Valley Region and, thus, falls within the category of records protected under state and federal law.

¹ Cal. Gov. Code § 7927.705 (“Except as provided in Sections 7924.510, 7924.700, and 7929.610, this division does not require disclosure of records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege.”).

² Cal. Gov. Code § 7923.600(a) (“[T]his division does not require the disclosure of records of complaints to, or investigations conducted by . . . any state or local police agency, . . . or any investigatory or security files compiled by any other state or local agency for correctional, law enforcement, or licensing purposes.”); D.15-09-009 at 19–20 (Ordering Paragraph (“OP”) No. 4) (protecting from disclosure utility compliance reports stemming from an investigation); Res. No. L-272 at 16, 21 (Conclusion of Law (“COL”) No. 9), 22 (OP No. 3) (Dec. 17, 1998) (protecting investigatory records of ongoing utility accident investigations from disclosure).

³ 47 C.F.R. § 0.457(d)(1)(iii) (citing 47 U.S.C. § 220); 47 U.S.C. § 220(f) (“No member, officer, or employee of the [FCC] shall divulge any fact or information which may come to his knowledge during the course of examination of books or other accounts, as hereinbefore provided, except insofar as he may be directed by the [FCC] or by a court.”).

B. Second Legal Basis for Confidential Treatment—Trade Secret

The CPRA protects against disclosure that is prohibited by state and federal law, including disclosure that is protected by the California Evidence Code.⁴ The California Evidence Code protects a “trade secret” from public disclosure.⁵

A “trade secret” is defined under California law as:

information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (1) [d]erives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) [i]s the subject of efforts that are reasonable under the circumstances to maintain its secrecy.⁶

The Commission has ruled that trade secrets are entitled to confidential treatment.⁷ The Confidential Information meets both elements of a trade secret. The Confidential Information contains information about Comcast’s network and operations, including the company’s practices and policies for the maintenance and repair of its facilities and the way it repaired certain facilities. The request for confidential treatment is supported by the attached declaration of John A. Gutierrez, Comcast’s Vice President, Regulatory Affairs – California, which attests that in the normal course of business, Comcast makes significant efforts to guard against disclosure of the Confidential Information, and that Comcast derives significant value from such information remaining confidential. Without the protection afforded by state law, the disclosure of Comcast’s Confidential Information would benefit competitors by giving them critical information about Comcast’s network and business processes in its Delta Valley Region and would put Comcast at a competitive disadvantage in the highly competitive communications marketplace.⁸

⁴ Cal. Gov. Code § 7927.705.

⁵ Cal. Evid. Code § 1060 (protecting against disclosure of trade secrets); *see, e.g., Lion Raisins Inc. v. USDA*, 354 F.3d 1072, 1080–81 (9th Cir. 2004) (where information collected by agency would allow competitor to “infer critical information about its competitors’ volume, market share, and marketing strategy,” agency appropriately refused to produce in response to a Freedom of Information Act (“FOIA”) request).

⁶ Cal. Civ. Code § 3426.1(d).

⁷ *See, e.g., D.14-12-037* at 90–91 (Findings of Fact (“FOF”) Nos. 83–86), 102 (COL Nos. 55–56) (protecting as trade secret business methodologies and facility operation information); *D.16-12-013* at 27, 32 (FOF No. 32) (granting motion for confidential treatment of data used for revenue, rates, and cost forecasting, in part, based on trade secret privilege).

⁸ Importantly, in applying the trade secret test under analogous provisions of FOIA, the U.S. Supreme Court clarified that a movant need not prove “substantial competitive harm” to receive confidential treatment of commercial or financial information under analogous provisions of FOIA. *See Food Mktg. Inst. v. Argus Leader Media*, 139 S. Ct. 2356, 2366 (2019). Instead, “where commercial or financial information is both customarily and actually treated as private by its owner and provided to the

In addition to meeting the two prongs of the trade secret definition, the California Evidence Code and Commission precedent require decisionmakers to balance the public interest for and against disclosure of a claimed trade secret to ensure no injustice occurs or fraud is concealed.⁹ Here, disclosure of the Confidential Information would reduce the benefits derived from a competitive communications marketplace by providing insight into nonpublic information about Comcast's operations. Moreover, protecting the Confidential Information would not result in injustice or concealment of fraud. Thus, the Confidential Information constitutes a trade secret, and the Commission should afford it confidential treatment.

C. Third Legal Basis for Confidential Treatment—Balancing Test

The CPRA protects against the disclosure of information where “the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure.”¹⁰ Here, Comcast is providing the Confidential Information to the Commission in response to the CIP Audit Report. Comcast is not aware of any public interest benefits that would be derived from public disclosure of the Confidential Information. Rather, as explained above, public disclosure of the Confidential Information would *harm* the public interest by reducing the benefits derived from a competitive communications marketplace. Comcast acknowledges the public interest in the Commission verifying the safety of its network infrastructure. However, public disclosure of the Confidential Information is not required for this interest to be served.

Additionally, public disclosure of the Confidential Information would *harm* the public interest by providing competitors with details regarding its network, which in turn would distort the operation of the market. Public disclosure of such information would also compromise public safety by exposing internal, non-public information about Comcast's network. Thus, the public interest served by not disclosing the Confidential Information clearly outweighs the public interest served by its disclosure.

government under an assurance of privacy, the information is ‘confidential’ within the meaning of [FOIA].” *Id.* Comcast has met that standard here.

⁹ Cal. Evid. Code. § 1060; D.20-12-021 at 26 (“[W]hen an agency wants to withhold records on the basis of trade secret privilege assertions, it must first determine whether the records include trade secrets, and then balance public interests for and against disclosure.”), *citing Coal. of Univ. Emps. v. Regents of Univ. of California*, No. RG03–089302, 2003 WL 22717384 (Cal. Super. Ct. July 24, 2003) (relying upon *Uribe v. Howie*, 19 Cal. App. 3d 194 (1971)).

¹⁰ Cal. Gov. Code § 7922.000; *see also* D.20-12-021 at 33 (“If an agency wishes to maintain confidentiality of any records, the agency must find that, on the facts of the particular case, ‘the public interest served by not disclosing the record *clearly* outweighs the public interest served by disclosure of the record.’”) (emphasis in original); *Michaelis, Montanari & Johnson v. Superior Court*, 38 Cal. 4th 1065, 1072–73, 1077 (2006) (applying the CPRA’s public interest balancing test and holding that proposals for a public lease were exempt from disclosure during the negotiation period to ensure benefits of competition which “assure the best social, environmental, and economic result for the public”).

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III. DECLARATION

The request for confidential treatment is supported by the attached declaration of John A. Gutierrez, Comcast's Vice President, Regulatory Affairs – California.

IV. CONTACT INFORMATION

Questions about Comcast's request for confidential treatment should be directed to James W. Tomlinson at (213) 633-6872 or jimtomlinson@dwt.com.

* * *

For the reasons stated above, Comcast respectfully requests confidential treatment of the Confidential Information.

Respectfully submitted,

/s/ James W. Tomlinson

James W. Tomlinson

DAVIS WRIGHT TREMAINE, LLP

Attorney for Comcast Phone of California, LLC

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
Matthew Yunge, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC


**DECLARATION OF JOHN A. GUTIERREZ IN SUPPORT OF
REQUEST FOR CONFIDENTIAL TREATMENT**

I, John A. Gutierrez, am informed and believe and hereby declare as follows:

1. I am John A. Gutierrez, Comcast's Vice President, Regulatory Affairs – California. The information stated herein has been derived from my work with Comcast. I have been granted authority to sign this declaration by Richard Chapkis, Vice President, Senior Deputy General Counsel, and Assistant Secretary, and an officer of Comcast.
2. In response to the findings of an audit report from the Commission, Comcast has provided information under seal for which it requests confidential treatment. This consists of non-public and commercially sensitive information, including: confidential business practices concerning the inspection, maintenance, and repair of its overhead and underground facilities, and records for the repair of certain facilities (collectively, the "Confidential Information").
3. The Confidential Information submitted herewith is part of an ESRB audit of Comcast's communications infrastructure in the Delta Valley Region.
4. Disclosure of the Confidential Information would put Comcast at a competitive disadvantage in the highly competitive communications marketplace. Specifically, nondisclosure of this sensitive information has independent economic value because its disclosure would benefit Comcast's competitors by giving them specific, non-public information about Comcast's network and operations, including practices and policies for the maintenance and repair of its facilities and the way it repaired certain facilities.
5. Comcast has taken significant efforts to guard the Confidential Information, and, to the best of my knowledge, such Confidential Information is not publicly available.
6. Comcast is not aware of any significant public interest benefits that would be derived from public disclosure of the Confidential Information. Rather, as explained in the above Request for Confidential Treatment, public disclosure of the Confidential response to this audit report would *harm* the public interest by reducing the benefits derived from a competitive communications marketplace.

I declare under penalty of perjury under the laws of the state of California that, to the best of my knowledge, the foregoing is true and correct.

Executed on May 15, 2025.



John A. Gutierrez

CONFIDENTIAL ATTACHMENT 1

RECORDS FINDING 1:

ESRB reviewed Comcast's work orders created between December 1, 2019 through December 1, 2024. During this time, Comcast created 516,238 work orders. ESRB found that 1,508 out of 516,238 (or 0.3%) of these work orders are late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their priority level, and late-closed work orders are work orders that were completed past their assigned due date based on their priority level. Table 1 below breaks down the 1,508 late work orders by priority level.

Table 1: Late Facility Work Orders

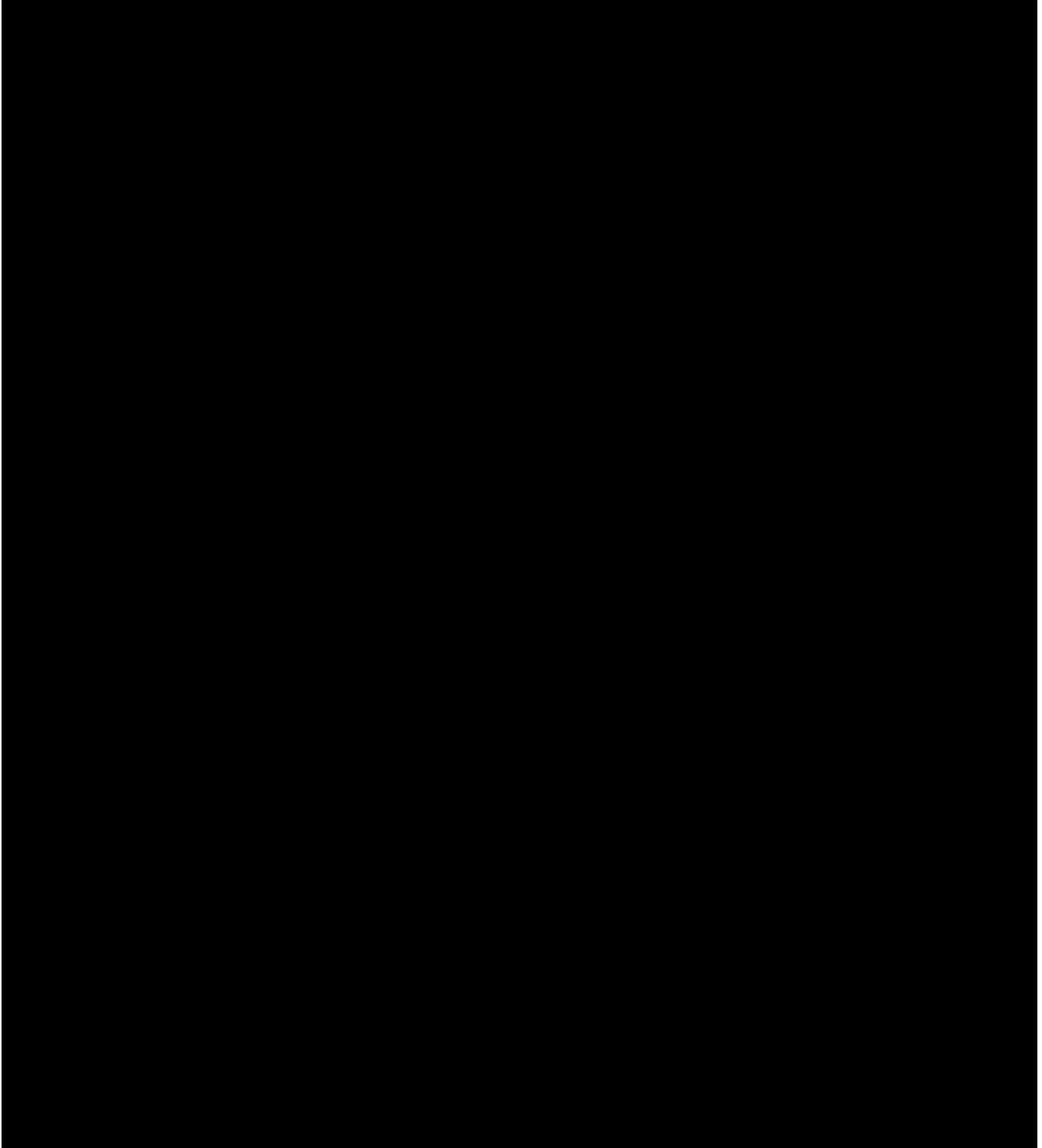
Priority Levels	Late-Pending Work Orders	Late-Complete Work Orders	Total Late Work Orders	Total Work Orders Created	Percent Late
1	13	996	1,009	1,009	100%
2	324	175	499	505,724	0.1%
3	0	0	0	9,505	0%
Total	337	1,171	1,508	516,238	0.3%

The most overdue Priority 1 work order was identified during an inspection of the pole at 4051 Happy Valley Rd. in Lafayette. It was created on March 24, 2022 for a span that required heavy tree trimming and had a due date of March 25, 2022. Comcast completed the work order on December 7, 2023, 622 days late. Many of the overdue Priority 1 work orders in the table above were due to vegetation-related issues. Comcast stated that "because of the logistics involved in coordinating some Priority Level 1 tree trims, immediate repairs may take up to 90 days." Comcast's work management system currently requires Priority 1 work orders to be completed in one day. This 90-day tree trimming repair window is currently not reflected in Comcast's work management system.

The most overdue Priority 2 work order was identified during a patrol of the underground facility at 371 Camino Sobrante in Orinda. It was created on January 8, 2020 for an "HSD out" issue and had a due date of January 7, 2021. As of December 1, 2024, the work was not complete and is over 1,424 days late.

COMCAST'S RESPONSE:

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RECORDS FINDING 2:

ESRB compared Comcast's patrol and detailed inspection records with the locations of its facilities and identified that Comcast did not inspect 85 poles in Tier 2 High Fire-Threat Districts (HFTD) between December 1, 2019 through December 1, 2024. There were no corresponding patrol or detailed inspection records for these 85 locations. The locations are listed in Table 2 below:

Table 2: Missing Inspections in Tier 2 HFTD

Facility Identification Number	Latitude	Longitude
CALCP77009417	37.70766	-122.109
CALCP77011684	37.70653	-122.115
CALCP77011727	37.70749	-122.112
CALCP77011692	37.70669	-122.114
CALCP77009439	37.70934	-122.11
CALCP77009423	37.7073	-122.107
CALCP77009360	37.70581	-122.106
CALCP77009422	37.70709	-122.107
CALCP77011730	37.70862	-122.112
CALCP77009416	37.70813	-122.109
CALCP77009437	37.70893	-122.109
CALCP77011709	37.70503	-122.108
CALCP77009409	37.7102	-122.11
CALCP77011718	37.70747	-122.111
CALCP77011742	37.70877	-122.113
CALCP77011694	37.70727	-122.115
CALCP77011683	37.70684	-122.115
CALCP77009421	37.70677	-122.108
CALCP77011703	37.70729	-122.111
CALCP77011706	37.70448	-122.108
CALCP77011685	37.7061	-122.115
CALCP77011726	37.70721	-122.113

² However, Comcast believes the work order for 371 Camino Sobrante in Orinda remained pending in error. Comcast inspected this facility on May 7, 2025 and found no safety violations.

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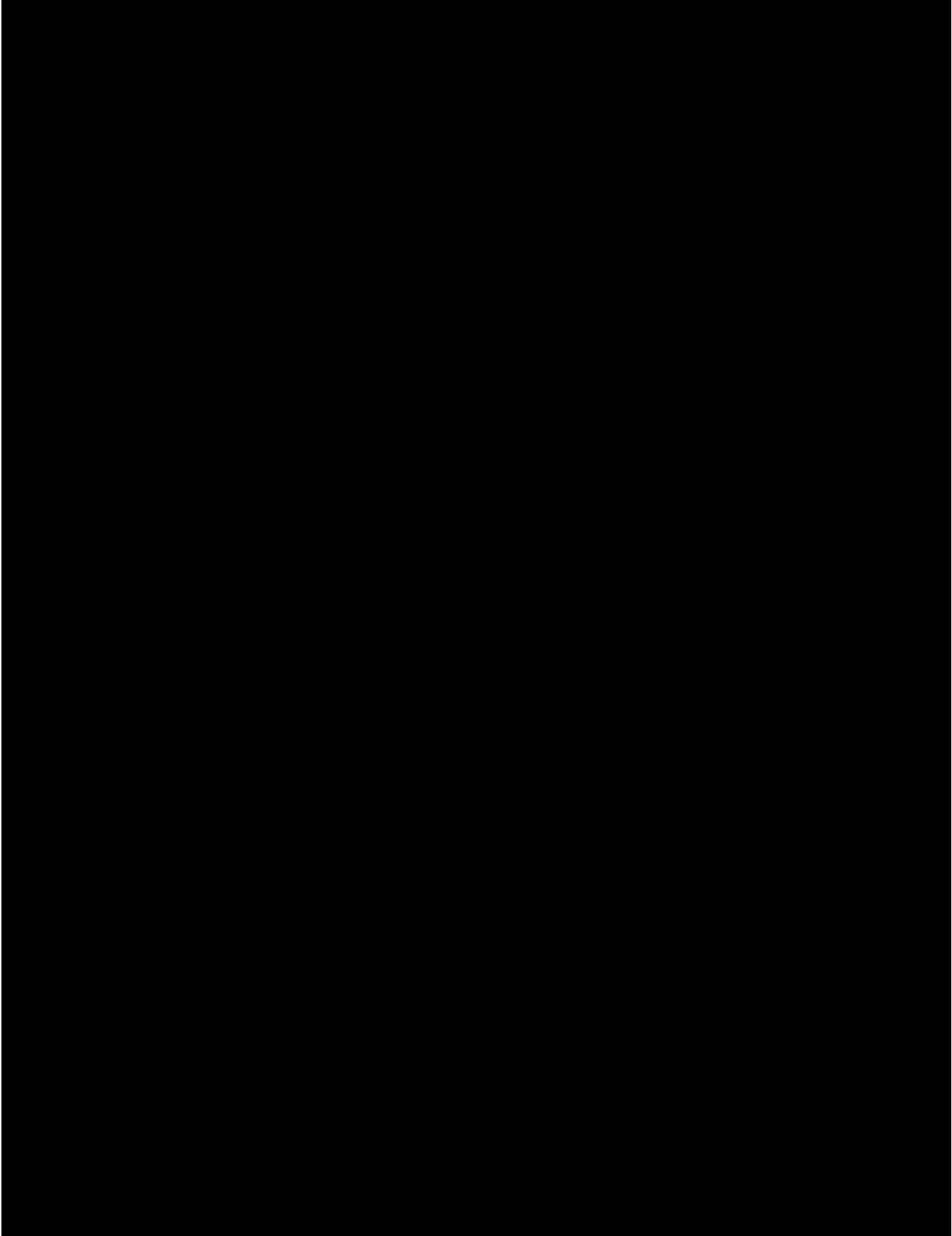
Facility Identification Number	Latitude	Longitude
CALCP77011679	37.70769	-122.11
CALCP77009436	37.70831	-122.11
CALCP77011674	37.70749	-122.109
CALCP77011676	37.7081	-122.109
CALCP77011672	37.70732	-122.11
CALCP77011728	37.70824	-122.112
CALCP77011720	37.70709	-122.111
CALCP77011697	37.70736	-122.113
CALCP77011696	37.70741	-122.113
CALCP77011739	37.70692	-122.112
CALCP77011681	37.70624	-122.114
CALCP77011702	37.70736	-122.111
CALCP77009359	37.7061	-122.105
CALCP77011693	37.70716	-122.114
CALCP77011747	37.70638	-122.116
CALCP77011711	37.7053	-122.108
CALCP77011695	37.70753	-122.114
CALCP77009365	37.70452	-122.106
CALCP77011682	37.70661	-122.114
CALCP77009420	37.70684	-122.108
CALCP77011708	37.70484	-122.108
CALCP77011735	37.70588	-122.109
CALCP77009438	37.70923	-122.11
CALCP77009413	37.71065	-122.109
CALCP77009415	37.70836	-122.11
CALCP77009412	37.71097	-122.11
CALCP77009418	37.70743	-122.108
CALCP77009410	37.71052	-122.11
CALCP77009419	37.70717	-122.108
CALCP77011707	37.70431	-122.107
CALCP77009407	37.70976	-122.11
CALCP77009411	37.71087	-122.11
CALCP77009408	37.71	-122.11
CCDI263235900	37.92189	-121.904
CALCP77009414	37.70855	-122.109
CALCP77009434	37.70428	-122.106
CALCP77011732	37.70696	-122.11
CCDI273537248	37.92487	-121.996
CALCP77009363	37.70547	-122.105
CALCP77009364	37.70526	-122.106
CALCP77011741	37.70784	-122.112

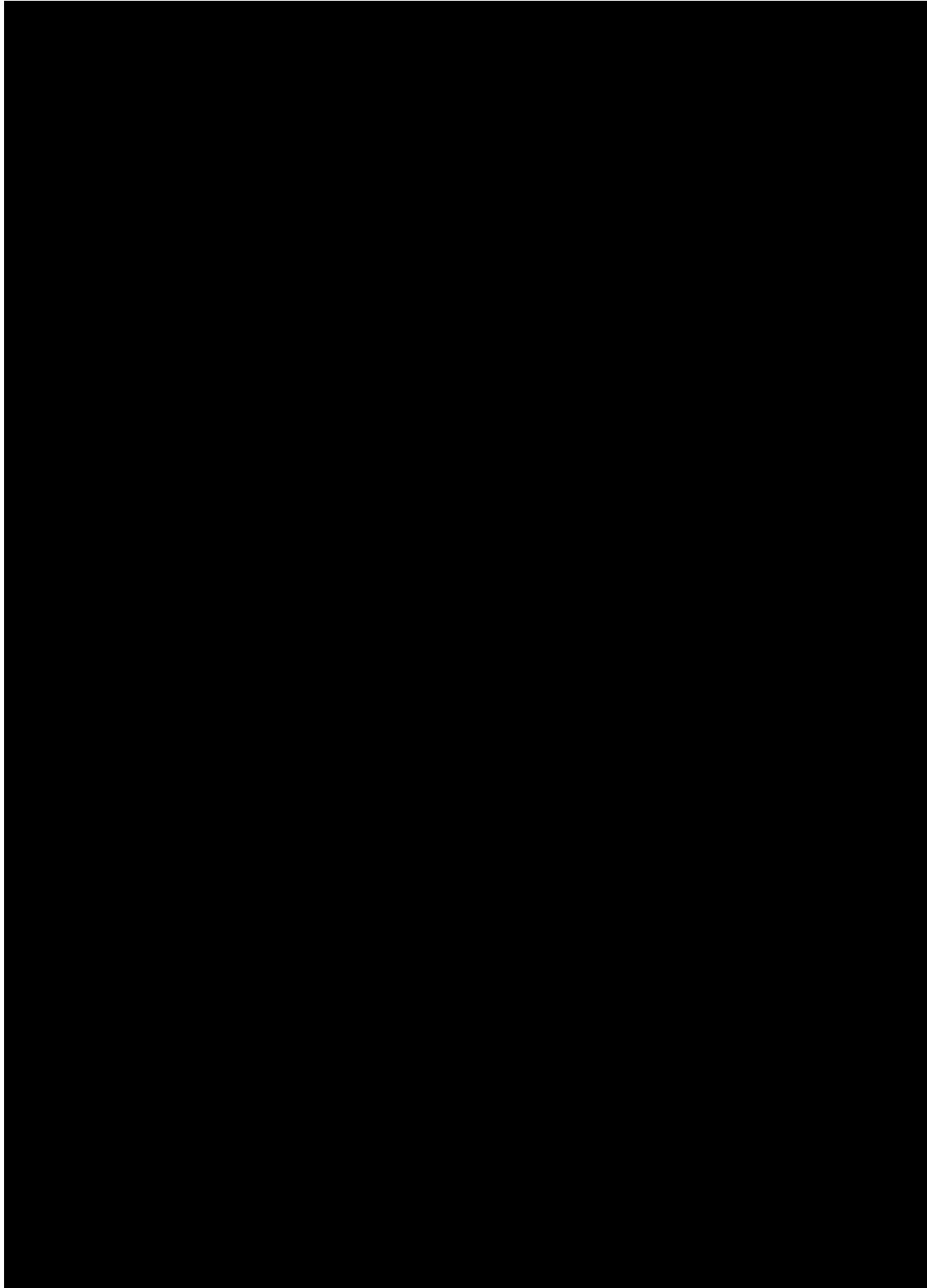
PUBLIC VERSION

Facility Identification Number	Latitude	Longitude
CALCP77009431	37.7066	-122.106
CALCP77009445	37.70499	-122.106
CALCP77011736	37.7056	-122.108
CALCP77011733	37.70652	-122.109
CALCP77009432	37.70688	-122.106
CALCP77011673	37.70727	-122.109
CALCP77011675	37.70779	-122.109
CALCP77011734	37.70613	-122.109
CALCP77011710	37.70526	-122.107
CALCP77011698	37.70713	-122.113
CALCP77011729	37.70851	-122.112
CALCP77011731	37.70825	-122.113
CALCP77011738	37.70724	-122.112
CALCP77009348	37.70646	-122.106
CALCP77011677	37.70574	-122.107
CALCP77009424	37.7074	-122.107
CALCP77011743	37.70862	-122.113
CALCP77009425	37.70762	-122.106
CALCP77011737	37.70676	-122.11
CALCP77011724	37.70585	-122.11
CALCP77011719	37.70711	-122.11
CALCP77011678	37.70765	-122.11

COMCAST'S RESPONSE:

[BEGIN CONFIDENTIAL]





[END CONFIDENTIAL]

RECORDS FINDING 3:

Comcast only routinely schedules detailed inspections of its communication lines and facilities in Tier 2 and Tier 3 HFTD. In all other areas, inspections only take place during other scheduled work. When sending a technician into the field to perform an assigned work order or investigate an issue, the technician inspects the assigned pole and the associated assets, along with one span in each direction. Comcast has no regular schedule for detailed inspections and patrols that ensures all poles and assets are inspected thoroughly and completely in non-HFTD. For non-HFTD areas, an inspection program based on the random probability of identifying equipment issues during service calls does not allow for a systematic approach that ensures all lines are inspected frequently and thoroughly.

COMCAST'S RESPONSE:

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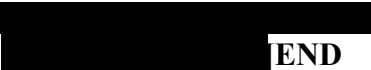
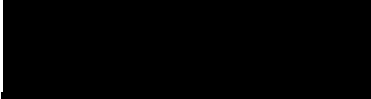
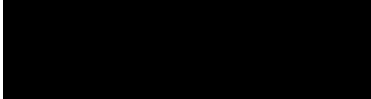
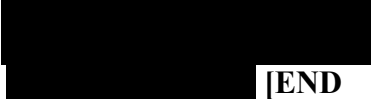
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CONFIDENTIAL ATTACHMENT 2


FIELD INSPECTION FINDINGS


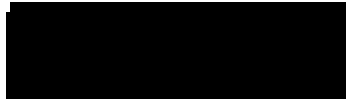
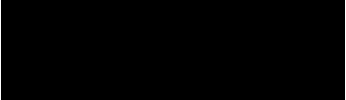

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
Table 4: GO 95, Rule 31.1 Findings						
13	37.9433419, -122.0221739	Concord	Pole	Comcast's power supply conduit near the disconnect box is damaged.	3/11/2025	Comcast resolved the issue by repairing the power supply conduit.
36	37.9350317, -122.0514274	Walnut Creek	Pole	Comcast's lashing wire is broken.	5/12/2025	Comcast resolved the issue by repairing the broken lashing wire.
59	37.8864625, -122.0682861	Saranap	Pole	Comcast needs to transfer its facilities to the new pole.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
66	37.6759957, -121.7733005	Livermore	Pole	Comcast's lashing wire is broken.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
77	37.6020557, -121.8916811	Sunol	Pole	Comcast needs to transfer its facilities to the new pole.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED]

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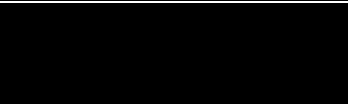
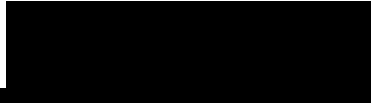
Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
						 [END CONFIDENTIAL]
117	37.9311198, -121.6926076	Brentwood	Pole	Comcast needs to transfer its facilities to the new pole.	5/12/2025	Comcast resolved the issue by transferring the facilities.
137	38.0352093, -121.8901291	Pittsburg	Pole	Comcast's lashing wire is broken.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
158	37.9667401, -122.1402159	Alhambra Valley	Pole	Comcast's lashing wire is broken.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
164	37.9982687, -122.1353407	Martinez	Pole	Comcast needs to transfer its facilities to the new pole.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
Table 5: GO 95, Rule 34 Finding						
122	37.9765838, -121.6954323	Oakley	Pole	There are foreign attachments (Christmas lights) tied to Comcast's service drop. During the audit, Comcast immediately notified the customer.	5/15/2025	Comcast resolved the issue by advising the customer to remove the attachments and confirming that the attachments were removed.
Table 6: GO 95, Rule 35 Finding						
33	37.9348733, -122.0526462	Walnut Creek	Pole	Vegetation is causing strain on Comcast's span.	5/12/2025	Comcast resolved the issue by performing vegetation management.
Table 7: GO 95, Rule 38, Table 2, Case 16.C Findings						
14	37.9431052, -122.0225699	Concord	Pole	Comcast's span is tied to Astound's span at the midspan.	3/11/2025	Comcast resolved the issue by relocating the service drop cable.
35	37.9350380, -122.0518861	Walnut Creek	Pole	A spool of Comcast's coaxial cable is dangling from the span and is less than three inches from the communication conductors below it.	4/30/2025	Comcast resolved the issue by removing the abandoned service drop cable.
48	37.8459499, -122.1567045	Orinda	Pole	Comcast's service drop is contacting AT&T's span.	3/12/2025	Comcast resolved the issue by relocating the service drop cable.
61	37.6822294, -121.7541924	Livermore	Pole	Comcast's service drop is contacting AT&T's service drop.	5/10/2025	Comcast resolved the issue by relocating the service drop cable.

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
69	37.6755637, -121.7746912	Livermore	Pole	Comcast's service drop is contacting AT&T's service drop.	5/10/2025	Comcast resolved the issue by relocating the service drop cable.
89	37.7155695, -122.0473190	Castro Valley	Pole	Comcast's service drop is contacting two AT&T's service drops.	5/8/2025	Comcast resolved the issue by relocating the two service drop cables.
119	37.9315717, -121.6930092	Brentwood	Pole	Comcast's span is tied to AT&T's span.	5/7/2025	Comcast resolved the issue by removing the zip tie connecting the spans.
130	38.0089889, -121.8173189	Antioch	Pole	Comcast's service drop is contacting AT&T's service drop.	5/7/2025	Comcast resolved the issue by relocating the service drop cable.
138	38.0355067, -121.8900000	Pittsburg	Pole	Comcast's span is tied to AT&T's span at the midspan.	3/14/2025	Comcast resolved the issue by relocating the service drop cable.
151	37.9885111, -122.0745032	Pacheco	Pole	Vegetation is causing Comcast's span to contact AT&T's span.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
Table 8: GO 95, Rule 84.4-D(4)(a) Finding						
124	37.9765294, -121.6958983	Oakley	Pole	Comcast's cable span is contacting a streetlight.	5/12/2025	Comcast resolved the issue by re-sagging the cable span.

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
Table 9: GO 95, Rule 84.6-B Findings						
13	37.9433419, -122.0221739	Concord	Pole	The ground moulding is separating from the surface of the pole and is exposing the ground wire.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
99	37.8281138, -121.9914083	Danville	Pole	The ground moulding is damaged and exposes the ground wire.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
126	38.0145666, -121.6418558	Bethel Island	Pole	The ground moulding is damaged and exposes the ground wire.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
151	37.9885111, -122.0745032	Pacheco	Pole	The ground moulding is separating from the surface of the pole and is exposing the ground wire.	By 6/30/2025	[BEGIN CONFIDENTIAL] 

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
						[REDACTED] [END CONFIDENTIAL]
155	37.9652295, -122.1402354	Alhambra Valley	Pole	The ground moulding exposes the ground wire at the base of the pole.	5/12/2025	Comcast resolved the issue by repairing the ground moulding.
Table 10: GO 95, Rule 84.6-D Finding						
41	37.8857038, -122.1099251	Lafayette	Pole	Comcast's riser cable is not secured at least every 24 inches.	5/12/2025	Comcast resolved the issue by repairing the riser guard.
Table 11: GO 95, Rule 84.8-C(3)(b) Findings						
121	37.9765675, -121.6948630	Oakley	Pole	Comcast's service drop is less than 10 feet over the house's front yard. Comcast immediately raised the service drop during the audit.	3/13/2025	Comcast resolved the issue by relocating the service drop cable.
164	37.9982687, -122.1353407	Martinez	Pole	Comcast's service drop is less than 10 feet over the house's front yard.	5/7/2025	Comcast resolved the issue by raising the service drop cable.
Table 12: GO 95, Rule 84.8-D(4) Finding						
16	37.9981110, -122.0266220	Concord	Pole	Comcast's service drop is contacting PG&E's service drop.	5/2/2025	Comcast resolved the issue by relocating the service drop cable.
Table 13: GO 95, Rule 86.2 Findings						
34	37.9350238, -122.0524195	Walnut Creek	Pole	Comcast's anchor guy is loose.	By 6/30/2025	[BEGIN CONFIDENTIAL]

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
						 [END CONFIDENTIAL]
153	37.9892526, -122.0745306	Pacheco	Pole	Comcast's anchor guy is missing. There is a guy hook (Ram's Head) installed on the pole, but no corresponding anchor guy.	5/12/2025	Comcast resolved the issue by placing a down guy.
Table 14: GO 95, Rule 86.7-B Finding						
131	38.0086775, -121.8173199	Antioch	Pole	Vegetation is grounding the guy above the guy insulator.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
Table 15: GO 95, Rule 86.9 Findings						
15	37.9428654, -122.0229447	Concord	Pole	Comcast's anchor guy marker is missing. Comcast immediately installed a new guy marker during the audit.	3/10/2025	Comcast resolved the issue by placing a guy guard.
58	37.8864654, -122.0681289	Saranap	Pole	Comcast's anchor guy marker is missing. Comcast immediately	3/11/2025	Comcast resolved the issue by placing a guy guard.

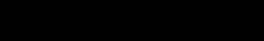

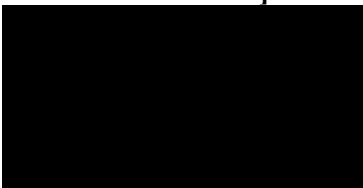

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
				installed a new guy marker during the audit.		
99	37.8281138, -121.9914083	Danville	Pole	Comcast's anchor guy marker is missing. Comcast immediately installed a new guy marker during the audit.	3/12/2025	Comcast resolved the issue by placing a guy guard.
113	37.9252842, -121.6229546	Discovery Bay	Pole	Comcast's anchor guy marker is missing. Comcast immediately installed a new guy marker during the audit.	3/13/2025	Comcast resolved the issue by placing a guy guard.
Table 16: GO 95, Rule 87.7-D(1) Findings						
41	37.8857038, -122.1099251	Lafayette	Pole	Comcast's riser cover exposes the riser cable near the base of the pole.	5/12/2025	Comcast resolved the issue by repairing the riser cable.
43	37.8859994, -122.1080599	Lafayette	Pole	Comcast's riser cable is missing a cover.	5/12/2025	Comcast resolved the issue by placing a cover over the riser cable.
76	37.6018294, -121.8913706	Sunol	Pole	Comcast's riser cable is missing a cover.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
79	37.6031214, -121.8917515	Sunol	Pole	Comcast's riser cover exposes the riser cable near the base of the pole.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED]

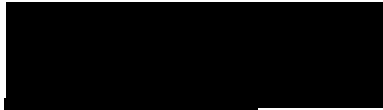
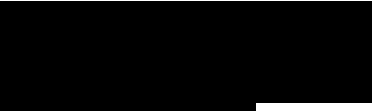
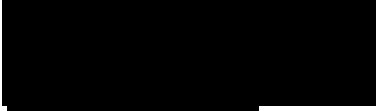

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
						[REDACTED] [END CONFIDENTIAL]
82	37.6321844, -121.8986143	Pleasanton	Pole	Comcast's riser cable is missing a cover.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
Table 17: GO 128, Rule 17.1 Findings						
7	37.9571748, -121.9912856	Concord	Pedestal	The amplifier is not grounded because the ground rod is missing.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
20	37.9146618, -121.9989134	Concord	Handhole	The amplifier is not grounded because the ground rod is missing.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
23	37.9144444, -121.9974037	Walnut Creek	Handhole	The end-of-the-line tap is not grounded.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED]

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Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
						[REDACTED] [END CONFIDENTIAL]
25	37.9157317, -121.9989209	Walnut Creek	Handhole	The end-of-the-line tap is not grounded.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
27	37.9091035, -122.0190451	Walnut Creek	Handhole	The amplifier is not bonded to the existing ground rod. Comcast immediately repaired the issue during the audit.	3/11/2025	Comcast resolved the issue by bonding the amplifier to the ground rod.
94	37.7826097, -121.9692727	San Ramon	Pedestal	The doghouse pedestal enclosure was not securely closed upon arrival. Comcast locked the doghouse during the audit. Additionally, the amplifier is not grounded because the ground rod is missing.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
101	37.8928843, -121.6096224	Discovery Bay	Pedestal	The amplifier is not grounded because the ground rod is missing.	By 6/30/2025	[BEGIN CONFIDENTIAL] [REDACTED]

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Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
						 [END CONFIDENTIAL]
107	37.8927850, -121.6121926	Discovery Bay	Pedestal	The end-of-the-line tap is not grounded. Additionally, the pedestal enclosure was damaged during the audit while closing the facility after inspection. Comcast must install a new pedestal enclosure.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
112	37.9252083, -121.6204380	Discovery Bay	Pedestal	The doghouse pedestal mounting brackets are corroded. Additionally, the amplifier is not grounded because the ground rod is missing.	By 6/30/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
Table 18: GO 128, Rule 17.8 Findings						
21	37.9144246, -121.9980491	Walnut Creek	Handhole	The ownership identification on the handhole is faded.	By 7/31/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
100	37.8925869, -121.6095077	Discovery Bay	Pedestal	The pedestal is not marked with ownership identification.	By 7/31/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
101	37.8928843, -121.6096224	Discovery Bay	Pedestal	The pedestal is not marked with ownership identification.	By 7/31/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
102	37.8931674, -121.6097705	Discovery Bay	Pedestal	The pedestal is not marked with ownership identification.	By 7/31/2025	[BEGIN CONFIDENTIAL]  [END CONFIDENTIAL]
Table 19: GO 128, Rule 42.7 Findings						
8	37.9573715, -121.9918220	Concord	Handhole	The handhole cover is cracked.	By 7/31/2025	[BEGIN CONFIDENTIAL] 

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Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
						[REDACTED] [END CONFIDENTIAL]
10	37.9578338, -121.9922012	Concord	Handhole	The handhole cover is cracked.	By 7/31/2025	[REDACTED] [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
22	37.9145134, -121.9976854	Walnut Creek	Handhole	The handhole cover does not fit over the enclosure.	By 7/31/2025	[REDACTED] [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
125	37.9765294, -121.6958983	Oakley	Handhole	The handhole cover is not securely closed.	By 7/31/2025	[REDACTED] [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]
Table 20: GO 95, Rule 18-A Findings (Third-Party Observations)						
12	37.9436206, -122.0217662	Concord	Pole	PG&E's anchor guy is loose. Astound's anchor guy is missing a guy marker.	3/11/2025	Comcast sent notice to PG&E and Astound.

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Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
				The ground moulding of an unknown communication company is damaged and exposes the ground wire.		
15	37.9428654, -122.0229447	Concord	Pole	AT&T's ground moulding is damaged and exposes the ground wire.	5/14/2025	Comcast sent notice to AT&T.
24	37.9150618, -121.9988950	Walnut Creek	Handhole	Astound's handhole lid is damaged.	5/14/2025	Comcast sent notice to Astound.
29	37.9088421, -122.0186455	Walnut Creek	Handhole	AT&T's handhole lid is damaged.	5/14/2025	Comcast sent notice to AT&T.
31	37.9336421, -122.0526596	Walnut Creek	Pole	Astound's lashing wire is broken.	5/14/2025	Comcast sent notice to Astound.
32	37.9344711, -122.0527377	Walnut Creek	Pole	Astound's span is tied to Comcast's span.	5/14/2025	Comcast sent notice to Astound.
33	37.9348733, -122.0526462	Walnut Creek	Pole	Vegetation is causing strain on AT&T's span. AT&T's service drop is contacting the anchor guy. AT&T's fiber tap has detached from the main span.	3/12/2025	Comcast sent notice to AT&T.
34	37.9350238, -122.0524195	Walnut Creek	Pole	AT&T's anchor guy is loose. AT&T's service drop is contacting the anchor guy.	3/12/2025	Comcast sent notice to AT&T.
35	37.9350380, -122.0518861	Walnut Creek	Pole	A spool of Astound's cable is dangling from their span. PG&E's ground moulding is damaged.	5/14/2025 (Astound)	Comcast sent notice to Astound and PG&E.

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
					3/12/2025 (PG&E)	
37	37.8853286, -122.1084733	Lafayette	Pole	AT&T's service drop is contacting Comcast's anchor guy.	3/12/2025	Comcast sent notice to AT&T.
38	37.8851196, -122.1089511	Lafayette	Pole	PG&E is missing an anchor guy marker. PG&E's ground moulding is damaged.	3/12/2025	Comcast sent notice to PG&E.
39	37.8852942, -122.1095318	Lafayette	Pole	PG&E's pole step is low.	3/12/2025	Comcast sent notice to PG&E.
41	37.8857038, -122.1099251	Lafayette	Pole	AT&T's riser cover is less than 8 feet. AT&T's riser cable is not secured to the pole.	3/12/2025	Comcast sent notice to AT&T.
43	37.8859994, -122.1080599	Lafayette	Pole	AT&T's riser cable is not covered. Vegetation is grounding PG&E's anchor guy above the insulator.	3/12/2025	Comcast sent notice to AT&T and PG&E.
49	37.8242627, -122.1250159	Moraga	Pole	There are giant woodpecker holes along the pole.	3/12/2025	Comcast sent notice to PG&E.
50	37.8239989, -122.1252919	Moraga	Pole	There is an abandoned AT&T service drop wrapped around the top pole step.	3/12/2025	Comcast sent notice to AT&T.
53	37.8611805, -122.0138483	Alamo	Pole	PG&E's pole is leaning more than 10%.	3/12/2025	Comcast sent notice to PG&E.
54	37.8605391, -122.0150362	Alamo	Pole	Verizon's riser cover exposes the riser cable near the base of the	3/12/2025	Comcast sent notice to Verizon.

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
				pole. Additionally, there is a tracer wire or an unbonded ground wire coming out of the riser cover.		
55	37.8862018, -122.0670892	Saranap	Pole	Seren's anchor guy is loose. AT&T's anchor guy is loose.	3/12/2025	Comcast sent notice to Seren and AT&T.
56	37.8863733, -122.0674935	Saranap	Pole	Seren's anchor guy is loose. Their lashing wire is also broken. AT&T's anchor guy is loose.	3/12/2025	Comcast sent notice to Seren and AT&T.
59	37.8864625, -122.0682861	Saranap	Pole	The communication companies need to transfer their facilities to the new pole.	5/14/2025	Comcast sent notice to Astound.
60	37.6822408, -121.7548137	Livermore	Pole	PG&E's ground moulding is damaged.	3/12/2025	Comcast sent notice to PG&E.
61	37.6822294, -121.7541924	Livermore	Pole	PG&E's ground moulding is detaching from the pole. A pole step is missing on one side of the climbing space, which causes the distance between steps on the same side to exceed 36 inches.	3/12/2025	Comcast sent notice to PG&E.
64	37.6822333, -121.7523983	Livermore	Pole	AT&T's service drop is contacting Comcast's service drop. PG&E's ground moulding is damaged.	3/12/2025	Comcast sent notice to AT&T and PG&E.

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Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
65	37.6761533, -121.7733330	Livermore	Pole	AT&T's vertical riser cable is missing a cover, and the cable is not secured every 24 inches.	3/12/2025	Comcast sent notice to AT&T.
67	37.6758314, -121.7737826	Livermore	Pole	PG&Es ground moulding is damaged.	3/12/2025	Comcast sent notice to PG&E.
69	37.6755637, -121.7746912	Livermore	Pole	PG&E's neutral wire is severed.	5/14/2025	Comcast sent notice to PG&E.
70	37.6754716, -121.7750181	Livermore	Pole	The insulation on PG&E's service drop is damaged. AT&T's service drop is abandoned.	3/12/2025	Comcast sent notice to PG&E and AT&T.
72	37.6729965, -121.7829745	Livermore	Pole	AT&T's service drop is tied to Comcast's service drop.	3/12/2025	Comcast sent notice to AT&T.
73	37.6729975, -121.7834912	Livermore	Pole	There are two abandoned AT&T service drops.	3/12/2025	Comcast sent notice to AT&T.
76	37.6018294, -121.8913706	Sunol	Pole	AT&T's vertical riser cable is missing a cover.	3/12/2025	Comcast sent notice to AT&T.
79	37.6031214, -121.8917515	Sunol	Pole	AT&T's vertical riser cable is exposed near the base of the pole. AT&T's riser cable is not secured every 24 inches.	3/12/2025	Comcast sent notice to AT&T.
80	37.6321902, -121.8989080	Pleasanton	Pole	PG&E's high voltage sign is damaged. There is pole top rot.	3/12/2025	Comcast sent notice to PG&E.
81	37.6318320, -121.8988637	Pleasanton	Pole	PG&E's span guy is less than 3 inches from the communication spans.	3/12/2025	Comcast sent notice to PG&E.

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
82	37.6321844, -121.8986143	Pleasanton	Pole	AT&T's overhead enclosure is damaged and is wrapped in a black plastic bag.	3/12/2025	Comcast sent notice to AT&T.
88	37.7154613, -122.0468251	Castro Valley	Pole	AT&T's service drop is contacting Comcast's service drop.	5/14/2025	Comcast sent notice to AT&T.
89	37.7155695, -122.0473190	Castro Valley	Pole	AT&T's service drop is tied to Comcast's span.	3/12/2025	Comcast sent notice to AT&T.
91	37.7562901, -122.0293693	Brookshire	Pole	There are foreign attachments (advertisement signs) on PG&E's pole.	5/14/2025	Comcast sent notice to PG&E.
113	37.9252842, -121.6229546	Discovery Bay	Pole	AT&T's span contacts Comcast's span at the midspan. AT&T's ground moulding is damaged.	3/14/2025	Comcast sent notice to AT&T.
116	37.9308821, -121.6923997	Brentwood	Pole	AT&T's lashing wire is loose.	3/14/2025	Comcast sent notice to AT&T.
119	37.9315717, -121.6930092	Brentwood	Pole	AT&T's service drop is tied to Comcast's span. AT&T's riser cover exposes the riser cable near the base of the pole.	3/14/2025	Comcast sent notice to AT&T.
123	37.9765873, -121.6957404	Oakley	Pole	AT&T's span is resting on top of the traffic signal arm. PG&E's anchor guy is missing a marker.	3/14/2025	Comcast sent notice to AT&T. Comcast sent notice to PG&E.
128	38.0146765, -121.6424325	Bethel Island	Pole	AT&T's pole has pole top rot.	3/14/2025	Comcast sent notice to AT&T.

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
				AT&T's span is lashed into Comcast's span. Vegetation is causing strain and potentially abrasion on AT&T's span.		
131	38.0086775, -121.8173199	Antioch	Pole	AT&T's service drop is tied to Comcast's span. Vegetation is grounding PG&E's anchor guy above the insulator.	3/14/2025	Comcast sent notices to AT&T and PG&E.
132	38.0083367, -121.8170751	Antioch	Pole	AT&T's overhead enclosure is damaged. PG&E's anchor guy is loose.	3/14/2025	Comcast sent notice to AT&T and PG&E.
133	38.0083335, -121.8166832	Antioch	Pole	There is an abandoned AT&T service drop.	3/14/2025	Comcast sent notice to AT&T.
137	38.0352093, -121.8901291	Pittsburg	Pole	There are two abandoned AT&T service drops.	3/14/2025	Comcast sent notice to AT&T.
141	38.0361344, -121.8903065	Pittsburg	Pole	AT&T's span is tied to Comcast's span.	3/14/2025	Comcast sent notice to AT&T.
142	38.0395091, -121.9687735	Bay Point	Pole	AT&T's span contacts Comcast's span.	3/14/2025	Comcast sent notice to AT&T.
143	38.0389137, -121.9690491	Bay Point	Pole	AT&T's service drop is abandoned and tied to the home's rain downspout.	3/14/2025	Comcast sent notice to AT&T.
152	37.9888428, -122.0745176	Pacheco	Pole	AT&T's overhead enclosure is damaged. Astound's service drops are contacting Comcast's and AT&T's service drops.	3/14/2025	Comcast sent notice to AT&T and Astound.

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
153	37.9892526, -122.0745306	Pacheco	Pole	AT&T needs to transfer its facilities to the new pole. AT&T's serviced drop is contacting Astound's service drop.	3/14/2025	Comcast sent notice to AT&T.
154	37.9891382, -122.0751405	Pacheco	Pole	PG&E's anchor guy marker is not eight feet. There is a low pole step. PG&E's ground moulding is damaged.	3/14/2025	Comcast sent notice to PG&E.
158	37.9667401, -122.1402159	Alhambra Valley	Pole	AT&T's span guy is loose.	5/14/2025	Comcast sent notice to AT&T.
159	37.9671826, -122.1402481	Alhambra Valley	Pole	PG&E's anchor guy is loose.	3/14/2025	Comcast sent notice to PG&E.
160	37.9890933, -122.1346195	Martinez	Pole	AT&T needs to transfer its facilities to the new pole. AT&T's riser cable is exposed.	3/14/2025	Comcast sent notice to AT&T.
161	37.9888750, -122.1350755	Martinez	Pole	AT&T needs to transfer its facilities to the new pole.	3/14/2025	Comcast sent notice to AT&T.
164	37.9982687, -122.1353407	Martinez	Pole	AT&T's service drop is low. AT&T's service drop is tied to Comcast's span. The communication companies need to transfer their facilities to the new pole.	3/14/2025 (AT&T) 5/14/2025 (Astound)	Comcast sent notice to AT&T and Astound.
165	37.9987868, -122.1354108	Martinez	Pole	AT&T needs to transfer its facilities to the new pole.	3/14/2025	Comcast sent notice to AT&T.

Location #	Approximate GPS Coordinates	City	Structure Type	Findings	Date of Remedial Action	Preventative Measure / Corrective Action
166	38.0213708, -122.1296350	Martinez	Pole	There are abandoned AT&T service drops. PG&E's anchor guy marker is not eight feet.	3/14/2025	Comcast sent notice to AT&T and PG&E.
167	38.0212559, -122.1292990	Martinez	Pole	PG&E's anchor guy marker is not eight feet.	3/14/2025	Comcast sent notice to PG&E.
168	38.0210663, -122.1291371	Martinez	Pole	AT&T's riser cover is missing.	3/14/2025	Comcast sent notice to AT&T.