

LAW OFFICES OF LEON M. BLOOMFIELD

1970 Broadway, SUITE 1100
OAKLAND, CALIFORNIA 94612
DIRECT: 510.282.62404
EMAIL: lmb@wblaw.net

August 21, 2025

VIA E-MAIL

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

Re: Electric Safety and Reliability Branch's Audit of the T-Mobile Alameda County
Group

Dear Mr. Tse:

On behalf of T-Mobile West LLC dba T-Mobile ("T-Mobile"), attached please find T-Mobile's response to the Electric Safety and Reliability Branch's (ESRB) Audit Report for the Alameda County Group dated July 14, 2025.

As always, please let me know if you have any questions regarding the attached.

Sincerely,

/s/

Leon M. Bloomfield

cc - via email w/attachments:

Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Eric Wu, Program Manager, Safety and Enforcement Division, 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
Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC
Rafael Herranz, Utilities Engineer, ESRB, SED, CPUC
Thomas Roberts, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Daniel Pell, Sr. Manager, Engineering Development, T-Mobile
Peter Castenada, Network Connex
Walter Callejas, Network Connex
Stephen Kukta, T-Mobile
Chris Jordan, T-Mobile
Tony Traini, T-Mobile

T-Mobile's Response to the ESRB Audit Report dated July 14, 2025

I. Findings re Alleged Violations

Finding 1.

GO 95, Rule 12.2 Maintenance of Lines states:

“All lines and portions of lines shall be maintained in such condition as to provide safety factors not less than those specified in Rule 44.3. Lines and portions of lines constructed or reconstructed on or after the effective date of this Order shall be kept in conformity with the requirements of this Order.

The restoration of clearance originally established prior to the effective date of this Order, where the original clearance has been reduced by additional sagging or other causes, is not considered to be reconstruction and the reestablished clearance shall conform to the requirements of the rules in effect at the time the original clearance was established. The changing of clearance for any other purpose is reconstruction and clearances so changed shall comply with the rules of this Order applicable to reconstruction.”

ESRB's findings related to the above rule are listed in Table 2:

Table 2: GO 95, 12.2 Findings

Location #	Findings
28	Incomplete pole transfer.
34	Incomplete pole transfer.
38	Incomplete pole transfer.

Response to Finding 1.

T-Mobile notes that it does not believe that the incomplete pole transfers noted above constitute a violation of Rule 12.2. The T-Mobile facilities at these locations were not transferred to the new poles installed by PG&E because the new poles were not tall enough to accommodate these attachments while maintaining the necessary separations required by the General Order. Thus, pending the installation of a taller pole, or PG&E's rearrangement of the facilities on the new pole, T-Mobile is compelled to maintain its facilities on the pre-existing poles. As a general matter, and as reflected by the decision to maintain its facilities as described above, T-Mobile's policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles in a manner consistent with the General Order.

A summary of T-Mobile's plans with respect to the items noted above is included in Attachment A at the Tab marked "F1-Table 2".

Finding 2.

General Order (GO) 95, Rule 31.1 Design, Construction 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 3:

Table 3: GO 95, Rule 31.1 Findings

Location #	Findings
3	The pole has a missing lock on the disconnect switch.
17	The pole has a missing lock on the disconnect switch.
17	Ground wire on pole mounted metallic box is not connected.
19	Pole mounted disconnect lid is damaged and not secured.
21	Pole mounted disconnect lid is damaged and not secured.
24	The pole has a missing lock on the disconnect switch.
26	The pole has a missing lock on the disconnect switch.
31	Pole mounted disconnect lid is damaged and not secured.
32	The pole has a missing lock on the disconnect switch.
33	Pole mounted disconnect lid is damaged and not secured.
34	The pole has a missing lock on the disconnect switch.
35	The pole has a missing lock on the disconnect switch.
36	There is an abandoned ground wire and plate at the base of the pole
39	Ground wire on pole mounted metallic box is damaged
40	The pole has a missing lock on the disconnect switch.
44	Pole mounted disconnect lid is damaged and not secured.

Response to Finding 2.

As noted above, T-Mobile's policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles in a manner consistent with the General Order. To that end, and among other things, it generally installs locks on disconnect switches, secures disconnect lids, and connects ground wires on sites. It also otherwise conducts regular inspections and remediates any issues discovered in the course of those inspections based on the appropriate priority level. T-Mobile, however, cannot control for normal wear and tear on a site, the actions of wildlife (e.g., birds) and/or a number of factors that are outside its control (e.g., vandalism, car accidents, actions of other providers on the pole).

Consistent with sound business practices and the General Order, T-Mobile further responds that its remediation plan as to each of the items identified in Table 3 is set forth in the Tab marked "F2-Table 3" in Attachment A.

Finding 3.

GO 95, Rule 84.6B – Ground Wires states:

"Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8-A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium-hard-drawn copper.

Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8)."

ESRB's finding related to the above rule is listed in Table 4:

Table 4: GO 95, Rule 84.6B Finding

Location #	Finding
44	The ground cover is damaged, exposing the ground wire.

Response to Finding 3.

T-Mobile's policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles in a manner consistent with the General Order. To that end, and among other things, it generally installs ground covers. It also otherwise conducts regular inspections and remediates any issues discovered in the course of those inspections based on

the appropriate priority level. T-Mobile, however, cannot control for normal wear and tear on a site and/or a number of factors that are outside its control (e.g., vandalism, car accidents, and the actions of other providers on the pole).

T-Mobile further notes that its remediation plan as to the site identified above in Table 4 is set forth in the Tab marked “F3-Table 4” in Attachment A.

Finding 4.

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 5:

Table 5: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
5	The riser is exposed near the base of the pole.
35	The riser guard is below 8 feet.
36	The riser is missing a suitable covering.
36	The riser is exposed near the base of the pole

Response to Finding 4.

T-Mobile’s policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles in a manner consistent with the General Order. T-Mobile, however, cannot control for normal wear and tear on a site and/or a number of factors that are outside its control (e.g., vandalism, car accidents, actions of other providers on the pole).

Consistent with sound business practice and the General Order, T-Mobile further notes that its remediation plan as to the sites identified above is set forth in the Tab marked “F4-Table 5”.

Finding 5.

GO 95, Rule 94.5B, Marking states:

“Joint use poles shall be marked with a sign for each antenna installation as follows:

- (1) Identification of the antenna operator*
- (2) A 24-hour contact number of antenna operator for Emergency or Information*
- (3) Unique identifier of the antenna installation.”*

ESRB’s findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 94.5B Findings

Location #	Findings
3	The pole is missing its operator label.
4	The equipment is missing its operator label.
29	The pole is missing its unique identifier.
44	The pole is missing its unique identifier.

Response to Finding 5.

T-Mobile’s policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles in a manner consistent with the General Order. To that end, T-Mobile’s general practice is to install signage on each site as required. T-Mobile, however, cannot control for wear and tear, the removal of such labels by vandals; and/or a number of factors that are outside its control.

Consistent with sound business practice and the General Order, T-Mobile further notes that its remediation plan as to the sites identified above is set forth in the Tab marked “F5-Table 6”.

Finding 6.

GO 95, Appendix H, Exhibit A, Additional Marking Requirements states in part:

“The Antenna Owner/Operator will place the sign so that it is clearly visible to workers who otherwise climb the pole or ascend by mechanical means and affix said sign:

- (i) no less than three (3) feet below the Antenna (measured from the top of the sign); and*
- (ii) no less than nine (9) feet above the ground line (measured from the bottom of the sign)”*

ESRB's finding related to the above rule is listed in Table 7:

Table 7: GO 95, Appendix H, Exhibit A Finding

Location #	Finding
7	The required signage is below 9 feet.

Response to Finding 6.

T-Mobile's policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles in a manner consistent with the General Order. To that end, T-Mobile general practice is to install signage on each sites as required.

Consistent with sound business practice and the General Order, T-Mobile further notes that its remediation plan as to the site identified above is set forth in the Tab marked "F6-Table 7".

Finding 7.

GO 128, Rule 17.1, 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."

ESRB's finding related to the above rule is listed in Table 8:

Table 8: GO 128, Rule 17.1 Finding

Location #	Finding
6	External ground has been cut.

Response to Finding 7.

T-Mobile's policy and procedure is to design, construct, maintain and inspect its underground facilities associated with joint utility poles in a manner consistent with General Order 128. T-Mobile, however, cannot control for normal wear and tear on a site and/or a number of factors that are outside its control (e.g., vandalism, car accidents, and the actions of other providers on the pole).

Consistent with sound business practice and the General Order, T-Mobile further notes that its remediation plan as to the site identified above is set forth in the Tab marked “F7-Table 8”.

II. OBSERVATIONS

Observation No. 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 9:

Table 9: GO 95, Rule 18-A Findings

Location #	Utility	Findings
3	AT&T	Communication wire on T-Mobile antenna.
5	PG&E	Pole is leaning over 10 percent.
7	AT&T	Riser guard lower than 8 feet.
8	AT&T	Uncovered cables attached to T-Mobile equipment.
9	AT&T	Uncovered riser cables.
11	AT&T	Uncovered riser cables.
12	Unknown	Slack down guy.
15	AT&T	Low span over the road.
17	AT&T	Abandoned fiber hanging to ground.
17	PG&E	Exposed ground rod.
19	AT&T	Slack down guy.
25	PG&E	Loose messenger guy.
28	AT&T	Incomplete pole transfer.
28	Comcast	Incomplete pole transfer.

31	AT&T	Wires contacting multiple down guys.
31	Comcast	Wire contacting down guy.
32	Comcast	Wire contacting AT&T wire.
33	PG&E	Supply service drop contacting communication wires.
34	AT&T	Incomplete pole transfer.
38	AT&T	Incomplete pole transfer.
38	Unknown	Incomplete pole transfer.
39	PG&E	Low pole step.
41	PG&E	Pole leaning greater than 10 percent.
44	PG&E	Damage ground cover.

Response to Observation 1:

Consistent with General Order 95, T-Mobile’s general practice is to provide notification to electric utilities or other communications companies when – in the course of an inspection – it discovers what it believes to be a “Safety Hazard” on the other company’s facilities. Safety Hazards are defined in the General Order as a “condition that poses a significant threat to human life or property.”

Upon review of the items identified above by Staff during its audit, T-Mobile does not necessarily believe that each of the items identified above constitute Safety Hazards as that term is used in the General Order or as otherwise used by pole owners and attachers (e.g., incomplete pole transfer). Nonetheless, consistent with General Order 95, Rule 18.A(3) and (4), T-Mobile has provided notice to (i) PG&E, AT&T and Comcast regarding the staff’s Safety Hazard determinations – as well as the site ID, pole ID, street address and lat/long - with respect to each of their respective facilities noted above, and (ii) PG&E and AT&T (both presumably pole owners) with respect to those facilities where the site facility owner was unclear. A summary of T-Mobile’s notifications for the items identified above in Table 9 is set forth in the Tab marked “O1- Table 9”.