LAW OFFICES OF LEON M. BLOOMFIELD

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June 23, 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 GO 95/128 Audit Report for T-Mobile's

San Francisco 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 San Francisco County Group dated May 22, 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)
Eric Wu, Program Manager, Safety and Enforcement Division, ESRB, SED
Fadi Daye, Program and Project Supervisor, ESRB, SED
Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB, SED
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED
Emiliano Solorio, Utilities Engineer, ESRB, SED
Javier Reyes, Utilities Engineer, ESRB, SED
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED
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

Response of T-Mobile West LLC dba T-Mobile to the Electric Safety and Reliability Branch Audit Report dated May 22, 2025

I. <u>Findings re Alleged Violation</u>

Finding 1.

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 2:

Location #	Findings
6	T-Mobile has a broken cable. Finding was fixed in field
15	T-Mobile cable is not secured to pole.
37	Birds nest was found in the T-Mobile cables.

Response to Finding 1.

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 secures its cables to the poles, 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 2 is set forth in the Tab marked "F1-Table 2" in Attachment A.

Finding 2.

GO 95, Rule 87.4 H From Grounded Metal Boxes, Hardware and Equipment Associated with Supply Lines states:

"Cables and messengers installed on non-metallic poles or non-metallic structures shall have a minimum clearance of 48 inches below or 72 inches above grounded metal boxes, hardware or metal cases for equipment associated with supply lines.

Exceptions:

- (1) The 72 inches above may be reduced 48 inches where there is not a pole mounted communication drop distribution terminal above the grounded metal box, hardware or metal case for equipment, or where the grounded metal box, hardware or metal case for equipment is securely bonded to the communication cable and/or messenger (see Figure 54-4).
- (2) The 72 inches above may be reduced to 48 inches when the grounded metal box, hardware or metal case for equipment is on the opposite side of a pole from a pole mounted communication drop distribution terminal."

ESRB's findings related to the above rule are listed in Table 3:

Location #	Findings	
32	Grounded metal equipment does not meet 72 inch clearance with messenger above.	
34	Grounded metal equipment does not meet 72 inch clearance with messenger above.	
38	Grounded metal equipment does not meet 48 inch clearance with messenger above. This location falls under exception (1) since the pole does not have a communication drop distribution terminal above the grounded metal equipment.	
85	Grounded metal equipment does not meet 48 inch clearance with messenger above. This location falls under exception (1) since the pole does not have a communication drop distribution terminal above the grounded metal equipment.	

Grounded metal equipment does not meet 48 inch clearance with messenger above. This location falls under exception (1) since the pole does not have a communication drop distribution terminal above the grounded metal equipment.

Response to Finding 2.

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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 including, but not limited to, with respect to all clearance requirements. To that end, T-Mobile's 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 findings related to the above rule are listed in Table 4:

Location #	Findings	
1	There is an exposed ground wire at base of pole.	
3	There is an exposed ground wire at base of pole.	

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. T-Mobile notes, however, that Rule 84.6B is generally directed at the electric utilities, not at wireless companies that otherwise rely on the electric utilities to bring power to the facilities on the pole.

T-Mobile further notes that its remediation plan as to each of the items identified in Table 4 is set forth in the Tab marked "F3-Table 4" in Attachment A.

Finding 4.

GO 95, Rule 84.7A – Climbing Space states:

"Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

The climbing space shall be maintained in the same position on the pole for minimum vertical distance of 4 feet above and below each conductor level through which it passes, excepting that where a cable is attached to a crossarm or a pole with the cable less than 9 or 15 inches from the center line of the pole supporting conductors on line arms (no buck arm construction involved) in accordance with the provisions of Rules 84.4–D1 or 87.4–C3, the 4 foot vertical distance may be reduced to not less than 3 feet.

The position of the climbing space shall not be shifted more than 90 degrees around the pole within a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.

The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–A5."

ESRB's finding related to the above rule is listed in Table 5:

Location #	Findings
11	Vegetation is impeding climbing space.

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. To that end, T-Mobile notes that vegetation management is generally addressed by Rule 35. T-Mobile further responds that Rule 54.6.F(2) does not define vegetation as a "climbing space obstruction." Moreover, Appendix J provides that "[c]limbing space obstructions from vegetation with incidental intrusion into the communication space that (i) does not prevent work from being done does and (ii) does not violate Rule 35." T-Mobile also notes that it cannot control for vegetation growth on or near its facilities on poles.

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 "F4-Table 5".

Finding 5.

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 6:

Location #	Findings
30	T-Mobile cable is missing a riser.
35	T-Mobile riser is below 8 feet.
48	T-Mobile riser is below 8 feet.
62	T-Mobile riser is below 8 feet.
72	T-Mobile riser is below 8 feet.
74	T-Mobile riser is below 8 feet.

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. 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 "F5-Table 6".

Finding 6.

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 7:

Location #	Findings	
	SF43645A is missing the identification of the	
15	antenna operator. Site is also missing the unique	
	identifier.	
20	SF53945C is missing the unique identifier.	
22	SF53935D is missing the unique identifier.	
30	SF03229A is missing the unique identifier.	
39	SF15001H is missing the unique identifier.	
43	SF55683D is missing the unique identifier.	
45	SF24696B is missing the unique identifier.	
46	SF24459D is missing the unique identifier.	
48	SF15042E is missing the unique identifier.	
50	SF24847H is missing the unique identifier.	
58	SF54281C is missing the unique identifier.	
60	SF24424D is missing the unique identifier.	
62	SF24662D is missing the unique identifier.	
64	SF15901F is missing the unique identifier.	
66	SF54215D is missing the unique identifier.	
68	SF24462D is missing the unique identifier.	
72	SF14168G is missing the unique identifier.	
74	SF15052F is missing the unique identifier.	
76	SF44742B is missing the unique identifier.	
86	SF03194A is missing the unique identifier.	

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. T-Mobile,

however, cannot control for wear and tear 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 "F6-Table 7".

Finding 7.

GO 128, Rule 17.1, Design, Construction and Maintenance states:

"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 findings related to the above rule are listed in Table 8:

Location #	Findings	Notes
47	Pedestal is missing NFPA sticker.	
49	Pedestal is missing NFPA sticker.	
51	Pedestal is missing NFPA sticker.	
57	Pedestal is missing NFPA sticker.	T-Mobile added a lock in the field.
59	Pedestal is missing NFPA sticker.	
61	Pedestal is missing NFPA sticker.	
63	Pedestal is missing NFPA sticker.	
71	Pedestal is missing NFPA sticker.	
75	Pedestal is missing NFPA sticker.	
76	Pedestal is missing NFPA sticker.	
79	Pedestal is missing NFPA sticker.	

Response to Finding 7.

Consistent with sound business practices as well as General Orders 95 and 128,¹ pedestals are generally marked with emergency contact information as well as NFPA stickers. There is, however, no explicit requirement in General Order 128 that requires that pedestals include a NFPA sticker and T-Mobile cannot control for wear and tear and/or the removal of such labels by vandals.

T-Mobile notes that the issues identified above do not appear to be violations of GO 128 as they do not involve underground facilities and otherwise refer to matters which do not generally impact T-Mobile's ability to furnish safe, proper or adequate service to its customers.

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 "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:

Location #	Findings	Notes
1	PG&E has an exposed ground wire.	
1	PG&E has a missing lock on panel box.	
1	Communications needs transfer of facilities to	
1	new pole.	
2	Telco has an abandoned service drop.	
3	PG&E has a missing lock on panel box.	
3	Communications utility has an exposed ground	
3	wire.	
4	Communications utility has a service drop in	
	contact with other communications conductors.	
5	PG&E has a missing lock on panel box.	
6	PG&E has a missing lock on panel box.	
11	PG&E has a missing lock on panel box.	
13	PG&E has a missing lock on panel box.	
14	Telco has an abandoned service drop.	

15	PG&E has a missing lock on panel box.			
18	PG&E has a missing lock on panel box.			
20	PG&E needs to remove an idle facility.			
20	PG&E has a missing lock on panel box.			
20	PG&E has an exposed ground wire.			
20	Telco conductor is missing a riser.			
22	PG&E has a missing lock on panel box.			
22	There is vegetation strain on communication conductors midspan.			
22	Telco has a riser below 8 feet.			
24	Telco has a riser below 8 feet.			
27	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.		
27	There is a broken communications ground wire.			
29	Telco conductor is missing a riser.			
29	There are abandoned communications service drops			
32	PG&E has a missing lock on panel box. T-Mobile added a lock field.			
33	Pole has a low pole step.			
33	PG&E has a missing lock on panel box.			
33	Telco has a riser below 8 feet.			
37	There are communication service drops in contact with the antenna.			
38	There is vegetation strain on communication conductors midspan.			
39	PG&E has a missing lock on panel box.			
41	PG&E has a missing lock on panel box.			
41	Pole has a low pole step.			
43	Telco has a loop slack in contact with T-Mobile facilities.			
43	PG&E has a missing lock on panel box.			
43	Telco has a riser below 8 feet.			
45	PG&E has a missing lock on panel box.			
45	Telco conductor is missing a riser.			
48	Telco has a riser below 8 feet.			
50	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.		
50	Telco has an exposed ground wire.			
50	Pole has a low pole step.			
58	Telco has a riser below 8 feet.			
58	Telco has an exposed ground wire.			
60	Pole has a low pole step.			
60	Telco has a riser below 8 feet.			

66	Telco has a riser below 8 feet.			
68	Telco has a riser below 8 feet.			
68	Telco conductor is not attached to the pole.			
72	Telco has a riser below 8 feet.			
76	PG&E has a missing lock on panel box.			
76	Telco has a riser below 8 feet.			
80	CATV has an exposed ground wire.			
81	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.		
82	Telco has a conductor in contact with T-Mobile facilities.			
83	Telco has an idle facility on pole.			
84	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.		
85	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.		
85	CATV has an exposed ground wire.			
86	Telco has a missing lock on panel box.			
87	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.		
88	Telco has a riser below 8 feet.			
89	Telco has a riser below 8 feet.			
90	There is a loose communications guy wire.			
90	There is an exposed communications ground wire.			
90	PG&E has a missing lock on panel box. T-Mobile added a loc field.			
91	PG&E has a missing lock on panel box.			

Response to Observation 1:

Consistent with General Order 95, T-Mobile provides notification to electric utilities or other communications companies when – in the course of an inspection – it discovers a "Safety Hazard" on the other company's facilities. Safety Hazards are defined as a "condition that poses a significant threat to human life or property."

Upon review of the items identified by Staff during its audit, T-Mobile does not believe that any 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. Nonetheless, consistent with General Order 95, Rule 18.A.(3) and (4), T-Mobile has provided (i) notice to both PG&E and AT&T 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 as well as (ii) notice to both 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".

Location #	Site ID	Findings
6	SF53540A	T-Mobile has a broken cable. Finding was fixed in field
15	SF43645A	T-Mobile cable is not secured to pole.
37	SF03140A	Birds nest was found in the T-Mobile cables.

From Staff: Finding was fixed in field

T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly. The Loose Cable is a fiber cable that does not pose any structural intregrity or reliability of performance to any other utilies on the pole.

T-Mobile has designated this as a Priority Level 3 item and will remediate accordingly. Nesting is located on the coaxial cables below the antennas, where it does not pose a significant threat to human life or propertyT-Mobile further notes that bird study will need to be conducted as to the times of nesting season and when it can be removed.

Location #	Site ID	Findings
32	SF03167A	Grounded metal equipment does not meet 72 inch clearance with messenger above.
34	SF03214A	Grounded metal equipment does not meet 72 inch clearance with messenger above.
38	SF53946C	Grounded metal equipment does not meet 48 inch clearance with messenger above. This location falls under exception (1) since the pole does not have a communication drop distribution terminal above the grounded metal equipment.
85	SF53188A	Grounded metal equipment does not meet 48 inch clearance with messenger above. This location falls under exception (1) since the pole does not have a communication drop distribution terminal above the grounded metal equipment.
91	SF53923A	Grounded metal equipment does not meet 48 inch clearance with messenger above. This location falls under exception (1) since the pole does not have a communication drop distribution terminal above the grounded metal equipment.

T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly. T-Mobile intends to to reconfigure the equipment boxes/radios on the site to provide for a 48" clearance consistent with the exceptions in H-1 and/or H-2. This work will likely require Design and Permitting to complete.

T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly. T-Mobile intends to to reconfigure the equipment boxes/radios on the site to provide for a 48" clearance consistent with the exceptions in H-1 and/or H-2; if necessary, will provide 72" clearance. This work will likely require Design and Permitting to complete.

T-Mobile is unclear if the messenger was added after its equipment or whether there was a possible design issue with this site. T-Mobile further notes that this clearance issue does not pose an immediate risk of high potenial impact to safety or reliability. Upon review, T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly; will require Design and Permitting to complete.

T-Mobile is unclear if the messenger was added after its equipment or whether there was a possible design issue with this site. T-Mobile further notes that this clearance issue does not pose an immediate risk of high potenial impact to safety or reliability. Upon review, T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly; will require Design and Permitting to complete.

T-Mobile is unclear if the messenger was added after its equipment or whether there was a possible design issue with this site. T-Mobile further notes that this clearance issue does not pose an immediate risk of high potenial impact to safety or reliability. Upon review, T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly; will require Design and Permitting to complete.

Location #	Site ID	Findings
1	SF53 3 22A	There is an exposed ground wire at base of pole.
3	SF43568B	There is an exposed ground wire at base of pole.

Note: the Site ID for Location 1 has been corrected. See red font.

T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly. This remediation will require permit for minor excavation work.

T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly. This remediation will require permit for minor excavation work.

Location #	Site ID	Findings
11	SF43579D	Vegetation is impeding climbing space.

T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly. Permit will be needed from the City of San Franscisco due to the location of the site and the anticipated temporary encroachment in a busy area.

Location #	Site ID	Findings
30	SF03229A	T-Mobile cable is missing a riser.
35	SF03212A	T-Mobile riser is below 8 feet.
48	SF15042E	T-Mobile riser is below 8 feet.
62	SF24662D	T-Mobile riser is below 8 feet.
72	SF14168G	T-Mobile riser is below 8 feet.
74	SF15052F	T-Mobile riser is below 8 feet.

- T-Mobile has designated this as a Priority Level 2 item and will remediate accordingly.
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Location #	Site ID	Findings
15	SF43645A	SF43645A is missing the identification of the antenna operator. Site is also missing the unique identifier.
20	SF53945C	SF53945C is missing the unique identifier.
22	SF53935D	SF53935D is missing the unique identifier.
30	SF03229A	SF03229A is missing the unique identifier.
39	SF15001H	SF15001H is missing the unique identifier.
43	SF55683D	SF55683D is missing the unique identifier.
45	SF24696B	SF24696B is missing the unique identifier.
46	SF24459D	SF24459D is missing the unique identifier.
48	SF15042E	SF15042E is missing the unique identifier.
50	SF24847H	SF24847H is missing the unique identifier.
58	SF54281C	SF54281C is missing the unique identifier.
60	SF24424D	SF24424D is missing the unique identifier.
62	SF24662D	SF24662D is missing the unique identifier.
64	SF15901F	SF15901F is missing the unique identifier.
66	SF54215D	SF54215D is missing the unique identifier.
68	SF24462D	SF24462D is missing the unique identifier.
72	SF14168G	SF14168G is missing the unique identifier.
74	SF15052F	SF15052F is missing the unique identifier.
76	SF44742B	SF44742B is missing the unique identifier.
86	SF03194A	SF03194A is missing the unique identifier.

- T-Mobile has designated this as a Priority Level 3 item and will remediate accordingly.
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Location #	Site ID	Findings
47	SF24459D	Pedestal is missing NFPA sticker.
49	SF15042E	Pedestal is missing NFPA sticker.
51	SF24847H	Pedestal is missing NFPA sticker.
57	SF24874A	Pedestal is missing NFPA sticker.
59	SF54281C	Pedestal is missing NFPA sticker.
61	SF24424D	Pedestal is missing NFPA sticker.
63	SF24662D	Pedestal is missing NFPA sticker.
71	SF15124B	Pedestal is missing NFPA sticker.
75	SF15052F	Pedestal is missing NFPA sticker.
76	SF44742B	Pedestal is missing NFPA sticker.
79	BA52162A	Pedestal is missing NFPA sticker.

- T-Mobile has designated this as a Priority Level 3 item and will remediate accordingly.
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From Staff: T-Mobile added a lock in the field.

- T-Mobile has designated this as a Priority Level 3 item and will remediate accordingly.
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Location #	Site ID	Findings
1	SF53 3 22A	PG&E has an exposed ground wire.
1	SF53 3 22A	PG&E has a missing lock on panel box.
1	SF53 3 22A	Communications needs transfer of facilities to new pole.
2	T-Mobile's facilities are on SF43568B - Child Fiber Pole	Telco has an abandoned service drop.
3	SF43568B	PG&E has a missing lock on panel box.
3	SF43568B	Communications utility has an exposed ground wire.
4	T-Mobile's facilities are on SF23250J - Child Fiber Pole	Communications utility has a service drop in contact with other communications conductors.
5	SF53516A	PG&E has a missing lock on panel box.
6	SF53540A	PG&E has a missing lock on panel box.
11	SF43579D	PG&E has a missing lock on panel box.

13	SF23285E	PG&E has a missing lock on panel box.
14	SF23285E	Telco has an abandoned service drop.
15	SF43645A	PG&E has a missing lock on panel box.
18	BA10040H	PG&E has a missing lock on panel box.
20	SF53945C	PG&E needs to remove an idle facility.
20	SF53945C	PG&E has a missing lock on panel box.
20	SF53945C	PG&E has an exposed ground wire.
20	SF53945C	Telco conductor is missing a riser.
22	SF53935D	PG&E has a missing lock on panel box.
22	SF53935D	There is vegetation strain on communication conductors midspan.
22	SF53935D	Telco has a riser below 8 feet.
24	SF53335A	Telco has a riser below 8 feet.

27	SF53933C	PG&E has a missing lock on panel box.
27	SF53933C	There is a broken communications ground wire.
29	SF03216A	Telco conductor is missing a riser.
29	SF03216A	There are abandoned communications service drops
32	SF03167A	PG&E has a missing lock on panel box.
33	SF03167A	Pole has a low pole step.
33	SF03167A	PG&E has a missing lock on panel box.

33	SF03167A	Telco has a riser below 8 feet.
37	SF03140A	There are communication service drops in contact with the antenna.
38	SF53946C	There is vegetation strain on communication conductors midspan.
39	SF15001H	PG&E has a missing lock on panel box.
41	SF14959C	PG&E has a missing lock on panel box.
41	SF14959C	Pole has a low pole step.
43	SF55683D	Telco has a loop slack in contact with T-Mobile facilities.
43	SF55683D	PG&E has a missing lock on panel box.
43	SF55683D	Telco has a riser below 8 feet.
45	SF24696B	PG&E has a missing lock on panel box.
45	SF24696B	Telco conductor is missing a riser.
48	SF15042E	Telco has a riser below 8 feet.

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50	SF24847H	PG&E has a missing lock on panel box.
50	SF24847H	Telco has an exposed ground wire.
50	SF24847H	Pole has a low pole step.
58	SF54281C	Telco has a riser below 8 feet.
58	SF54281C	Telco has an exposed ground wire.
60	SF24424D	Pole has a low pole step.
60	SF24424D	Telco has a riser below 8 feet.
66	SF54215D	Telco has a riser below 8 feet.
68	SF24462D	Telco has a riser below 8 feet.
68	SF24462D	Telco conductor is not attached to the pole.
72	SF14168G	Telco has a riser below 8 feet.

76	SF44742B	PG&E has a missing lock on panel box.
76	SF44742B	Telco has a riser below 8 feet.
80	SF54255B	CATV has an exposed ground wire.
81	SF15063C	PG&E has a missing lock on panel box.
82	SF04638A	Telco has a conductor in contact with T-Mobile facilities.
83	SF03184A	Telco has an idle facility on pole.
84	SF53916C	PG&E has a missing lock on panel box.
85	SF53188A	PG&E has a missing lock on panel box.

85	SF53188A	CATV has an exposed ground wire.
86	SF03194A	Telco has a missing lock on panel box.
87	SF03194A	PG&E has a missing lock on panel box.
88	SF03160A	Telco has a riser below 8 feet.
89	SF03163A	Telco has a riser below 8 feet.
90	SF13065G	There is a loose communications guy wire.
90	SF13065G	There is an exposed communications ground wire.
90	SF13065G	PG&E has a missing lock on panel box.
91	SF53923A	PG&E has a missing lock on panel box.

Note: the Site ID for Location Nos. 1, 2, 4 and 14 have been corrected/clarified. See $r\varepsilon$

- T-Mobile sent a notice to PG&E re the staff's determination that this constitutes a Safety Hazard per GO 95.
- T-Mobile sent a notice to PG&E re the staff's determination that this constitutes a Safety Hazard per GO 95.
- T-Mobile's facilities have already been moved to a new pole that PG&E installed.

Neither T-Mobile nor the staff were able to identify the owner of the subject facilities on the old pole. Thus, consistent with GO 95, Rule 18.A(4), T-Mobile has sent a notice to both PG&E and AT&T re the staff's determination that this item constitutes a Safety Hazard under the General Order.

Neither T-Mobile nor the staff were able to identify the owner of the subject facility which was unmarked. Thus, consistent with GO 95, Rule 18.A(4), T-Mobile sent a notice to both PG&E and AT&T re the staff's determination that this item constitutes a Safety Hazard under the General Order.

T-Mobile sent a notice to PG&E re the staff's determination that this constitutes a Safety Hazard per GO 95.

Neither T-Mobile nor the staff were able to identify the owner of the subject facility which was unmarked. Thus, consistent with GO 95, Rule 18.A(4), T-Mobile sent a notice to both PG&E and AT&T re the staff's determination that this item constitutes a Safety Hazard under the General Order.

Neither T-Mobile nor the staff were able to identify the owner of the subject facility which was unmarked. Thus, consistent with GO 95, Rule 18.A(4), T-Mobile sent a notice to both PG&E and AT&T re the staff's determination that this item constitutes a Safety Hazard under the General Order.

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From Staff: T-Mobile added a lock in the field.

T-Mobile clarifies that any locks installed in the field by T-Mobile were installed on the T-Mobile side of the panel; the missing lock is on the PG&E side of the panel box.

In addition, T-Mobile notes that it sent a notice to PG&E re the staff's determination that this constitutes a Safety Hazard per GO 95.

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