

AT&T'S RESPONSE TO AUDIT RELATED TO THE MONTEREY AND SAN BENITO
COUNTIES REGION CONDUCTED
February 18 – February 21, 2025

Alleged Records Violation #1: ESRB's review of AT&T's Monterey and San Benito County Region work orders from January 2020 to December 2024 found that AT&T completed a total of 1,298 work orders late or are late pending. Late pending work orders are work orders that had due dates prior to February 5, 2025, when ESRB received the work order data, but were not complete by that date. Due dates were determined by using either the due dates provided by AT&T in its data request responses, by applying GO 95, Rule 18-B, or by using the maintenance intervals provided by AT&T in its Overhead Lines Maintenance Plan, whichever provides the earlier due date. Table 1 breaks down the late work orders for the Monterey and San Benito County Region.

Table 1. Monterey and San Benito County Region Late Closed Work Orders

Hazard Level	Complete	Pending	Total
1	40	0	40
2	542	288	830
2a	18	49	67
2b	55	186	241
2c	2	14	16
3	6	84	90
NA	12	2	14
Total	675	623	1298

AT&T Response:

AT&T does not concede that it violated GO 95, Rule 18. Based on the information provided in response to the pre-audit data request, it appears that 623 tickets are pending and 675 tickets have been closed. However, the status of these tickets does not necessarily reflect whether the associated corrective actions were completed by the assigned due dates, as the process of closing repair tickets requires careful manual documentation, which may result in some delay between the completion of corrective actions and the official ticket closure.

AT&T has undertaken, and continues to conduct, a thorough review of the 623 work orders identified as past due to determine whether each should be closed due to cancellation or invalidation, or if field work remains necessary. As of this submission, 158 work orders have been closed. AT&T remains committed to completing all outstanding work orders that require field work, both current and past due.

Alleged Records Violation #2: Table 2 lists the latest closed and most past due pending work orders.

Table 2. Monterey and San Benito County Region Most Past Due Work Orders

Package ID	Hazard Level	Create Date	Due Date	Closed Date	Days Late	Status
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917507	1	2021-09-20	2021-09-23	2022-05-24	243	Complete
540565	2	2020-01-01	2022-10-31	None	828	Open
788227	2a	2021-02-27	2021-11-22	None	1171	Open
540018	2b	2020-01-01	2020-10-31	None	1558	Open
788378	2c	2021-02-27	2021-11-24	None	1169	Open
540124	3	2020-01-01	2024-10-31	None	97	Open

AT&T Response:

- Work order #917507 was closed 5/24/2022, without admitting AT&T violated GO 95, Rule 18, AT&T will endeavor to complete work orders by the due date.
- Work order #540565 has been sent out for completion, and the work should be completed by 8/30/2025.
- Work order #788227 has been sent out for completion, and the work should be completed by 8/30/2025.
- Work order #540018 has been sent out for completion, and the work should be completed by 8/30/2025.
- Work order #540124 has been sent out for completion, and the work should be completed by 8/30/2025.
- Work order #788378 has been referred to AT&T's Engineering Department for the pole equipment to be transferred and the pole to be removed.

Alleged Field Inspection Violation #1: GO 95, Rule 31.1, Design, Construction and Maintenance

Table 4: GO 95, Rule 31.1 Findings

Location	Findings
5	Cable hanging from span.
6	Loose wire hanging from span.
14	Lines hanging outside of the equipment box.
17	Hanging service drop at attachment to building.
34	Splice hanging freely.
43	Buddy poles carrying AT&T equipment.
68	Rope being used to hold cable to fire-wrapped pole.

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74	Loose hanging cable.
74	Lashing wire getting undone.
74	Need to transfer assets to new pole.
106	Conductor sheathe is falling off.
108	Broken box on pole.
110	Excess hanging service drop.
114	Wire hanging from box.

AT&T Response:

- Location #5: Ticket 1688612 was created for the alleged finding with a due date of 5/8/2028.
- Location #6: Ticket 1688614 was created for the alleged finding with a due date of 5/8/2028
- Location #14: Ticket 1688619 was created for the alleged finding with a due date of 5/7/2030.
- Location #17: Ticket 1688623 was created for the alleged finding with a due date of 5/7/2030.
- Location #34: Ticket 1670838 was created for the alleged finding with a due date of 5/8/2030.
- Location #43: Ticket 1688591 was created for the alleged finding with a due date of 5/8/2030.
- Location #68: Ticket 1688609 was created for the alleged finding with a due date of 5/8/2030.
- Location #74: Ticket 1688597 was created for the alleged finding with a due date of 5/8/2030.
- Location #74: Ticket 1688598 was created for the alleged finding with a due date of 5/8/2030.
- Location #74: Ticket 990186 had already been created for the alleged finding with a due date of 9/1/2022, it will be completed by 8/30/2025.
- Location #106: Ticket 1685222 was created for the alleged finding with a due date of 5/8/2030.
- Location #108: Ticket 1675645 was created for the alleged finding with a due date of 5/8/2030.
- Location #110: Ticket 1685221 was created for the alleged finding with a due date of 2/19/2030.
- Location #114: Ticket 1688647 was created for the alleged finding with a due date of 5/8/2030.

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

Table 5: GO 95, Rule 31.6 Findings

Location	Findings
9	Abandoned line wrapped around pole
18	Hanging abandoned riser.
39	Cable hanging from span and coiled cable on pole.

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71	Abandoned service drop.
88	Service drop lashed to post.
96	Abandoned drop cut on both ends and fixed to pole.
113	Loose line hanging on pole down to 10 feet above ground.

AT&T Response:

- Location # 9: Ticket 1688622 was created for the alleged finding with a due date of 5/7/2030.
- Location #18: Ticket 1688624 was created for the alleged finding with a due date of 5/7/2030.
- Location #39: Ticket 1688607 was created for the alleged finding with a due date of 5/7/2030.
- Location #71: Ticket 1688593 was created for the alleged finding with a due date of 5/7/2030.
- Location #88: Ticket 1688596 was created for the alleged finding with a due date of 5/7/2030.
- Location #96: Ticket 1688592 was created for the alleged finding with a due date of 5/7/2030.
- Location #113: Ticket 1688644 was created for the alleged finding with a due date of 11/8/2025.

Alleged Field Inspection Violation #3: GO 95, Rule 37, Minimum Clearance of Wires above Railroads, Thoroughfares, Buildings

Table 6: GO 95, Rule 37 Findings

Location	Findings
73	Low clearance.
74	Low drop clearance.

AT&T Response:

- Location #73: Ticket 1688595 was created for the alleged finding with a due date of 11/7/2025.
- Location #74: Ticket 1688597 was created for the alleged finding with a due date of 5/8/2028.

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

Table 7: GO 95, Rule 38 Findings

Location	Findings
4	Comcast lines contacting AT&T line.
7	Contact with a deflected cable line
12	AT&T line hanging on cable lines.

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13	AT&T line looped around cable line.
14	Multiple AT&T lines crossing through cable line.
18	AT&T lines contacting cables lines.
105	Cable and AT&T drops contacting.
110	Contact between AT&T and cable lines.
112	Cable and AT&T lines in contact.
117	Comcast lines touching AT&T lines.
122	AT&T line touching cable lines.
127	AT&T service drop contacting cable lines.

AT&T Response:

- Location #4: Ticket 1688514 was created for the alleged finding with a due date of 5/7/2030.
- Location #7: Ticket 1688615 was created for the alleged finding with a due date of 5/7/2030.
- Location #12: Ticket 1688620 was created for the alleged finding with a due date of 5/7/2030.
- Location #13: Ticket 1688621 was created for the alleged finding with a due date of 5/8/2030.
- Location #14: Ticket 1688619 was created for the alleged finding with a due date of 5/7/2030.
- Location #18: Ticket 1688625 was created for the alleged finding with a due date of 5/7/2030.
- Location #105: Ticket 1688602 was created for the alleged finding with a due date of 5/8/2030.
- Location #110: Ticket 1688588 was created for the alleged finding with a due date of 5/8/2030.
- Location #112: Ticket 1688643 was created for the alleged finding with a due date of 5/8/2030.
- Location #117: Ticket 1688646 was created for the alleged finding with a due date of 5/8/2030.
- Location #122: Ticket 1688650 was created for the alleged finding with a due date of 5/8/2030.
- Location #127: Ticket 1688645 was created for the alleged finding with a due date of 5/8/2030.

Alleged Field Inspection Violation #5: GO 95, Rule 44.3, Replacement

Table 8: GO 95, Rule 44.3 Findings

Location	Findings
46	Broken lashing wire.
90	Broken lashing wire.
113	Broken lashing wire.

AT&T Response:

- Location #46: Ticket 1688611 was created for the alleged finding with a due date of 5/8/2030.

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- Location #90: Ticket 1688636 was created for the alleged finding with a due date of 5/7/2030.
- Location #113: Ticket 1680493 was created for the alleged finding with a due date of 3/12/2026.

Alleged Field Inspection Violation #6: GO 95, Rule 84.6-B, Ground Wires

Table 9: GO 95, Rule 84.6-B Findings

Location	Findings
19	Ground wire needs cover.
42	Exposed ground wire at base of pole.
77	Exposed ground wire needs cover.
120	Broken ground wire moulding.

AT&T Response:

- Location #19: Ticket 1688617 was created for the alleged finding with a due date of 5/8/2028.
- Location #42: Ticket 1688610 was created for the alleged finding with a due date of 5/7/2028.
- Location #77: Ticket 1688600 was created for the alleged finding with a due date of 5/8/2028.
- Location #120: Ticket 1688605 was created for the alleged finding with a due date of 5/8/2028.

Alleged Field Inspection Violation #7: GO 95, Rule 84.6-D, Vertical Runs

Table 11: GO 95, Rule 84.6-D Findings

Location	Findings
5	Ground wire needs cover.
92	Exposed ground wire at base of pole.
118	Exposed ground wire needs cover.

AT&T Response:

- Location #5: Ticket 1688613 was created for the alleged finding with a due date of 5/8/2028.
- Location #92: Ticket 1688633 was created for the alleged finding with a due date of 5/8/2030.
- Location #118: Ticket 1688652 was created for the alleged finding with a due date of 5/8/2028.

Alleged Field Inspection Violation #8: GO 95, Rule 84.6-F, Protective Covering

Table 12: GO 95, Rule 84.6-F Findings

Location	Findings
119	Riser cover needs to be reattached.

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120	Riser cover need to be reattached.
128	Cover needs to be resecured.

AT&T Response:

- Location #119: Ticket 1688651 was created for the alleged finding with a due date of 5/8/2030.
- Location #120: Ticket 1688605 was created for the alleged finding with a due date of 5/8/2028.
- Location #128: Ticket 1688649 was created for the alleged finding with a due date of 5/8/2030.

Alleged Field Inspection Violation #9: GO 95, Rule 84.7-A, Climbing Space

Table 13: GO 95, Rule 84.7-A Findings

Location	Findings
84	Climb space around pole hindered by vegetation.

AT&T Response:

- Location # 84: Ticket 1688601 was created for the alleged finding with a due date of 5/8/2030.

Alleged Field Inspection Violation #10: GO 95, Rule 86.2, Guys

Table 14: GO 95, Rule 86.2 Findings

Location	Findings
27	Loose down guy.
41	Slack down guy.
74	Slack down guy.
107	Slack down guy.

AT&T Response:

- Location #27: Ticket 1688616 was created for the alleged finding with a due date of 11/7/2025.
- Location #41: Ticket 1688608 was created for the alleged finding with a due date of 5/7/2030.
- Location #74: Ticket 1688599 was created for the alleged finding with a due date of 5/8/2030.
- Location #107: Ticket 1688604 was created for the alleged finding with a due date of 5/8/2030.

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Alleged Field Inspection Violation #11: GO 95, Rule 87.7-D.1, Covered from Ground Level to 8 Feet above the Ground

Table 15: GO 95, Rule 87.7-D.1 Findings

Location	Findings
43	Exposed risers at less than 8 feet.
70	Riser exposed and needs cover.
91	Risers need cover.
93	AT&T riser needs cover to 8 feet.
94	Riser needs cover.
95	Riser needs cover at ground level.
96	Risers need cover.
97	Risers either abandoned or need cover.
98	Riser exposed below 8 feet.
100	Riser needs cover.
101	Riser needs cover.
102	Risers need to be covered.
103	Riser needs cover.
105	Riser needs cover.
106	Riser needs cover.
108	Riser needs cover.
115	Risers need cover.

AT&T Response:

- Location #43: Ticket 1688590 was created for the alleged finding with a due date of 5/7/2030.
- Location #70: Ticket 989823 was already created for the alleged finding with a due date of 9/23/2024 but the work is expected to be complete by 8/30/2025.
- Location #91: Ticket 1688637 was created for the alleged finding with a due date of 5/8/2030.
- Location #93: Ticket 1688639 was created for the alleged finding with a due date of 5/8/2030.
- Location #94: Ticket 1688640 was created for the alleged finding with a due date of 5/8/2030.
- Location #95: Ticket 1688594 was created for the alleged finding with a due date of 5/7/2030.

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- Location #96: Ticket 1688641 was created for the alleged finding with a due date of 5/8/2030.
- Location #97: Ticket 1688642 was created for the alleged finding with a due date of 5/8/2030.
- Location #98: Ticket 1688634 was created for the alleged finding with a due date of 5/8/2030.
- Location #100: Ticket 1688635 was created for the alleged finding with a due date of 5/8/2030.
- Location #101: Ticket 1688631 was created for the alleged finding with a due date of 5/8/2030.
- Location #102: Ticket 1688632 was created for the alleged finding with a due date of 5/8/2030.
- Location #103: Ticket 1688633 was created for the alleged finding with a due date of 5/8/2030.
- Location #105: Ticket 1688603 was created for the alleged finding with a due date of 5/8/2030.
- Location #106: Ticket 1688630 was created for the alleged finding with a due date of 5/8/2030.
- Location #108: Ticket 1688589 was created for the alleged finding with a due date of 5/8/2030.
- Location #115: Ticket 1688648 was created for the alleged finding with a due date of 5/8/2030.

Alleged Field Inspection Violation #12: GO 128, Rule 17.1, Design, Construction and Maintenance

Table 16: GO 128, Rule 17.1 Findings

Location	Findings
53	Not able to open vault.
139	Vault not able to be opened.
140	Vault lid hook and lid broken.

AT&T Response:

- Location #53 & #139: During the field inspection, we could not open these vaults. In a service situation, an AT&T technician would break the lid to gain access. The manager would coordinate delivery of a replacement cover before the technician leaves the premises to ensure the safety of the environment and keep GO128 standards.
- Location #140: Ticket 1688516 was created for the alleged finding with a due date of 5/8/2026.

Observations

Table 17: Third-Party Observations

Location	Third-Party	Observations
2	Comcast	Exposed riser below 8-foot height.
5	Cable Company	Exposed cable riser at ground level.

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7	Comcast	Wire deflected by tree limb.
8	Cable Company	Hanging cable touching AT&T line.
38	Cable Company	Abandoned cable line.
38	Cable Company	Riser without cover.
40	Pacific Gas and Electric	Loose and exposed ground wire above 8 feet.
84	Pacific Gas and Electric	Vegetation touching down guy above insulator.
92	Cable Company	Coaxial cable abandoned.
93	Comcast	Service drop laying on the ground.
94	Comcast	Abandoned line.
95	Cable Company	Riser needs a cover.
96	Cable Company	Riser needs a cover.
97	Cable Company	Abandoned line and an uncovered riser.
98	Cable Company	Riser exposed below 8 feet.
100	Cable Company	Riser needs cover.
101	Cable Company	Riser needs cover.
102	Cable Company	Risers need to be covered.
103	Cable Company	Riser needs cover.
104	Comcast	Cable equipment contacting AT&T lines.
107	Pacific Gas and Electric	Slack down guys.
112	Cable Company	Risers not appropriately attached to pole.
112	Cable Company	Slack down guy.
129	Cable Company	Service drop not appropriately secured to pole.

AT&T Response:

Third Party notification will be sent for the alleged items.