



November 7, 2025

**Via Electronic Mail**

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

**Re: Audit of Verizon Communications (Verizon) Network in Riverside County Group**

Dear Mr. Daye:

This responds to the staff's Audit Report of Verizon facilities in Riverside County. Verizon has inserted its response into the Audit Report in the attached document. We are working on remediating deviations as to Verizon's facilities, and issued or will issue third party notices where appropriate.

Please treat our response as confidential and the locations of the sites as confidential, pursuant to the attached Declaration for Confidential Treatment.

Thank you,

*/s/ John Gavin*

John Gavin

**CPUC AUDIT FINDINGS OF  
VERIZON RIVERSIDE COUNTY GROUP  
SERVICE AREAS AUGUST 11-15, 2025**

**Audit Findings**

**I. Records Review**

During the audit, Electric Safety and Reliability Branch (ESRB) reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Safety hazard notifications
- Pole-loading calculations
- Verizon's documented inspection program

**II. Records Review – Violations List**

ESRB observed the following violations during the record review portion of the audit:

**GO 95, Rule 31.1 – 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.*

**GO 95, Rule 44.1 – Installation and Reconstruction**, states in part:

*Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*

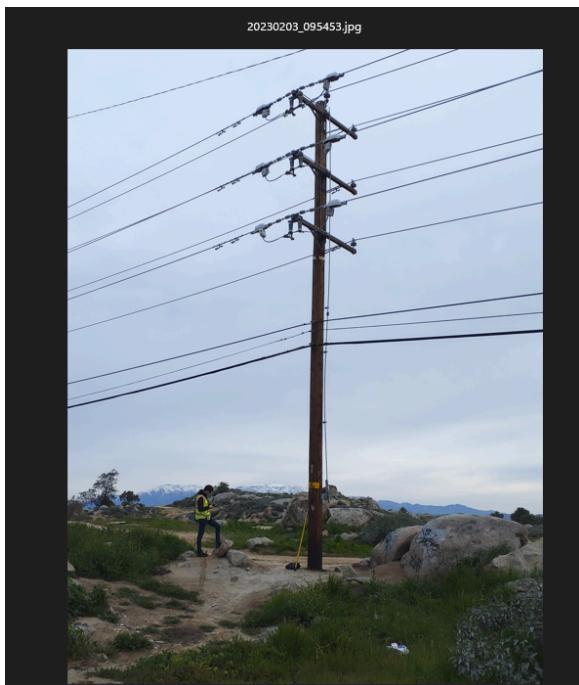
*The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.*

My staff discovered the following discrepancies between Verizon's pole loading records and conditions in the field:

- My staff observed that loading calculations by Verizon communication for Pole No. 1796632E was missing a secondary crossarm and a span guy at a height of 23.5 ft.

**Verizon Response:**

Verizon's loading calculations were accurate. The Verizon pole loading calculation was performed in 2023, and did not include the mentioned equipment, because the SCE cross arm and span guy were added after 2023. See attached photos (the first photo reflects the pole in 2023 when Verizon attached to it and the second photo with the red arrow shows the additions that were made subsequently in 2025).



### III. Field Inspection

My staff inspected the following facilities during the field inspection portion of the audit:

No.	Structure ID	Type of Structure	Location
1	1819026E	Pole	Norco
2	1819025E	Pole	Norco
3	1819024E	Pole	Norco
4	1819023E	Pole	Norco

5	1819022E	Pole	Norco
6	4259731E	Pole	Norco
7	4259730E	Pole	Norco
8	1309528E	Pole	Norco
9	1257606E	Pole	Norco
10	703800H	Pole	Norco
11	4808522E	Pole	Norco
12	1240133E	Pole	Norco
13	639406H	Pole	Norco
14	4860520E	Pole	Norco
15	4854944E	Pole	Norco
16	4237406E	Pole	Norco
17	4816883E	Pole	Norco
18	4860522E	Pole	Norco
19	4847470E	Pole	Norco
20	4816886E	Pole	Norco
21	30251J	Pole	Riverside
22	████████	Pole	Riverside
23	30255J	Pole	Riverside
24	30256J	Pole	Riverside
25	30258J	Pole	Riverside
26	30260J	Pole	Riverside
27	30261J	Pole	Riverside
28	████████	Pole	Riverside
29	J37389	Pole	Riverside
30	27668J	Pole	Riverside
31	27667J	Pole	Riverside
32	27665J	Pole	Riverside

33	27663J	Pole	Riverside
34	27146J	Pole	Riverside
35	27640J	Pole	Box Springs
36	2228081E	Pole	Box Springs
37	1686321E	Pole	Box Springs
38	215999R	Pole	Box Springs
39	1668441E	Pole	Box Springs
40	2228083E	Pole	Box Springs
41	2228084E	Pole	Box Springs
42	214487S	Pole	Box Springs

43	4943367E	Pole	Box Springs
44	4714261 E	Pole	Box Springs
45	2039802	Pole	Box Springs
46	2039803E	Pole	Box Springs
47	213204S	Pole	Box Springs
48	213205S	Pole	Box Springs
49	4714259E	Pole	Box Springs
50	4943370E	Pole	Box Springs
51	2014524E	Pole	Moreno Valley
52	4780104E	Pole	Moreno Valley
53	4063397E	Pole	Moreno Valley
54	316373E	Pole	Moreno Valley
55	4512359E	Pole	Moreno Valley
56	4231080E	Pole	Moreno Valley
57	4062102E	Pole	Moreno Valley
58	4968640E	Pole	Moreno Valley
59	2075199E	Pole	Moreno Valley

60	2075198E	Pole	Moreno Valley
61	4030196E	Pole	Moreno Valley
62	4968639E	Pole	Moreno Valley
63	[REDACTED]	Pole	Moreno Valley
64	[REDACTED]	Pole	Moreno Valley
65	4364465E	Pole	Moreno Valley
66	[REDACTED]	Pole	Moreno Valley
67	[REDACTED]	Pole	Moreno Valley
68	[REDACTED]	Pole	Moreno Valley
69	[REDACTED]	Pole	Moreno Valley
70	[REDACTED]	Pole	Perris
71	1796633E	Pole	Perris
72	1796632E	Pole	Perris
73	1796631E	Pole	Perris
74	1796630E	Pole	Perris
75	2344927E	Pole	Perris
76	[REDACTED]	Pole	Perris
77	4162093E	Pole	Perris
78	4162092E	Pole	Perris
79	4162091E	Pole	Perris
80	4162090E	Pole	Perris
81	4150517E	Pole	Perris
82	4150516E	Pole	Perris
83	1796640E	Pole	Perris
84	1796641E	Pole	Perris
85	15174S	Pole	Perris
86	[REDACTED]	Pole	Perris
87	[REDACTED]	Pole	Perris

88	████████	Pole	Perris
89	4057797E	Pole	Perris
90	████████	Pole	Perris
91	1796637E	Pole	Perris

92	4318395E	Pole	Perris
93	15181S	Pole	Perris
94	1544032E	Pole	Perris
95	4909690E	Pole	Perris
96	4330643E	Pole	Perris
97	4792680E	Pole	Perris
98	5003056E	Pole	Lake Elsinore
99	4542231E	Pole	Lake Elsinore
100	4791354E	Pole	Lake Elsinore
101	73706S	Pole	Lake Elsinore
102	4765622E	Pole	Lake Elsinore
103	4765367E	Pole	Lake Elsinore
104	4765368E	Pole	Lake Elsinore
105	4765369E	Pole	Lake Elsinore
106	4765623E	Pole	Lake Elsinore
107	4765369E	Pole	Lake Elsinore
108	4299540E	Pole	Lake Elsinore
109	5364519E	Pole	Lake Elsinore
110	4299374E	Pole	Lake Elsinore
111	4791378E	Pole	Lake Elsinore
112	73712S	Pole	Lake Elsinore
113	2358109E	Pole	Lake Elsinore
114	4532416E	Pole	Lake Elsinore

115	2358107E	Pole	Lake Elsinore
116	[REDACTED]	Vault	Moreno Valley
117	[REDACTED]	Vault	Moreno Valley
118	[REDACTED]	Vault	Moreno Valley
119	[REDACTED]	Vault	Moreno Valley
120	[REDACTED]	Vault	Moreno Valley
121	[REDACTED]	Vault	Jurupa Valley
122	[REDACTED]	Vault	Jurupa Valley
123	[REDACTED]	Vault	Jurupa Valley
124	[REDACTED]	Vault	Jurupa Valley
125	[REDACTED]	Vault	Jurupa Valley
126	[REDACTED]	Vault	Jurupa Valley
127	[REDACTED]	Vault	Riverside
128	[REDACTED]	Vault	Riverside
129	[REDACTED]	Vault	Riverside

#### IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection portion of the audit:

**GO 95, Rule 31.1, 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.*

Verizon's facilities on the following poles required maintenance:

Location	Violation Description
62	<p>Pole No. 4968639E-Incomplete Pole Transfer - FIBER not attached to new pole.</p> <p>Verizon Response: Verizon sent a third party notice to Charter (8/13/25).</p>

Location	Violation Description
80	<p>Pole No. 4162090E Ground Wire / Wood Moulding Damaged</p> <p><a href="#">Verizon Response: Verizon sent a third party notice to Charter (8/14/25).</a></p>
89	<p>Pole No. 4057797E – the down guy marker was damaged</p> <p><a href="#">Verizon Response: Verizon Business is working to remediate this.</a></p>
105	<p>Pole No. 4765369E – Verizon's three bolt clamp was not properly attached to the pole</p> <p><a href="#">Verizon Response: Verizon Business is working to remediate this.</a></p>
111	<p>Pole No. 4791378E – The conductor span had a broken lashing wire</p> <p><a href="#">Verizon Response: Verizon Business remediated this on (9/9/25)</a></p>

**GO 95, Rule 84.6-B, Ground Wires**, states in part:

*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.*

The ground moulding attached to Pole No. 4162090E was damaged.

Location	Violation Description
80	<p>Pole No. 4162090E Ground Wire / Wood Moulding Damaged</p> <p><a href="#">Verizon Response: The ground wire/wood moulding is not Verizon's.</a></p> <p><a href="#">Verizon sent a third party notice to Charter (8/14/25).</a></p>

**GO 95, Rule 35 – Vegetation Management**, states in part:

*When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).*

A Verizon communications conductor attached to each of the following poles was strained by vegetation:

Location	Violation Description
47	<p>Pole No. 213205S Trees / Foliage causing Strain on cable/messenger.</p> <p><a href="#">Verizon Response: Verizon Business is working to remediate this.</a></p>
48	<p>Pole No. 213204S Trees / Foliage causing Strain on cable/messenger</p> <p><a href="#">Verizon Response: Verizon Business remediated this on (9/9/25)</a></p>
66	<p>Pole No. XXXXXX Trees / Foliage causing Strain on cable/messenger.</p> <p><a href="#">Verizon Response: Verizon Business is working to remediate this.</a></p>
67	<p>Pole No. XXXXXX Trees / Foliage causing Strain on cable/messenger.</p> <p><a href="#">Verizon Response: Verizon Business is working to remediate this.</a></p>

**GO 95, Rule 86.2 – Overhead Guys, Anchor Guys and Span Wire Use**, states in part:

*Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of [Rule 44](#).*

The Verizon down guy wire attached to each of the following poles was loose and not taut:

Location	Violation Description
55	<p>Pole No. 4512359E Loose Down Guy</p> <p><a href="#">Verizon Response: Verizon sent a third party notice to Charter (8/13/25).</a></p>
56	<p>Pole No. 4231080E Loose Down Guy</p>

Location	Violation Description
	Verizon Response: Verizon Business is working to remediate this.
70	<p>Loose Down Guy</p> <p>Verizon Response: Verizon Business is working to remediate this.</p>

**GO 95, Rule 84.4-D4a [Clearances] From Nonclimbable Street Lighting or Traffic Signal Poles or Standards (including mastarms, brackets, and lighting fixtures)** states:

*When passing street lighting, traffic signal poles or standards (including mastarms, brackets and lighting fixtures) a clearance of 12 inches, as specified in Table 1, Case 10, Column B, may be reduced when suitable insulation for the highest voltage of open wire involved and mechanical protection from abrasion is provided where necessary. Such mechanical protection shall extend not less than 15 inches in each direction from centerline of pole, standard, attaching mastarm or fixture, whether passing above, below or alongside.*

A Verizon communications conductor supported on Pole No. 4968620E was in contact with a streetlight pole.

Location	Violation Description
69	<p>Communications conductor in contact with a streetlight pole</p> <p>Verizon Response: Verizon Business is working to remediate this.</p>

**GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19**, requires the minimum radial separation between “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Guys and span wires passing conductors supported on the same poles” to be 3 inches.

Location	Violation Description
71	<p>Pole No. 1796633E Verizon communications conductor was in contact with SCE down guy attached to the same pole</p> <p>Verizon Response: Verizon Business is working to remediate the communications conductor in contact with the SCE down guy. .</p>

Location	Violation Description
	<p>Verizon Response: Verizon sent a third party notice to SCE about their loose Down Guy and a third party notice to NG (Crown Castle) about their communications conductor also touching the SCE down guy (8/14/25).</p>

**GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8,** requires the minimum vertical separation between “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” on the same pole and in adjoining midspans to be 12 inches.

A Verizon communications conductor supported on each of the following poles had less than 12 inches of vertical clearance from a third-party communications conductors supported on the same pole:

Location	Violation Description
47	<p>Pole No. 213204S - Comm Cable not 12" CLR from Comm (at Span)</p> <p>Verizon Response: Verizon Business is working to remediate this.</p>
50	<p>Pole No. 4943370E - Comm Cable not 12" CLR from Comm (at Span)</p> <p>Verizon Response: Verizon Business remediated this on (8/13/25).</p>
56	<p>Pole No. 4231080E - Comm Cable not 12" CLR from Comm (at Span)</p> <p>Verizon Response: Verizon Business is working to remediate this.</p>

**General Order 95, Rule 86.9, Guy Marker (Guy Guard),** states:

*A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached*

*to an anchor rod, only the outermost guy is required to have a marker.*

Location	Violation Description
70	<p>A Verizon down guy wire attached to the pole located at [REDACTED] did not have a marker</p> <p><i>Verizon Response: Verizon Business is working to remediate this. In addition, this pole is not tagged, and Verizon will send a third party notice to SCE to tag it.</i></p>

**GO 128, Rule 17.1 – Design, Construction and Maintenance**, states in part:

*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 [the] communication or supply lines and equipment.*

Each of the following Verizon vault covers was missing bolts (not properly secured):

Location	Violation Description
116	<p>Pole No. 2228081E Verizon vault cover was missing bolts (not properly secured).</p> <p><i>Verizon Response: Verizon Business is working to remediate this.</i></p>
117	<p>[REDACTED] Verizon vault cover was missing bolts (not properly secured).</p> <p><i>Verizon Response: Verizon Business is working to remediate this.</i></p>
118	<p>[REDACTED] Verizon vault cover was missing bolts (not properly secured).</p> <p><i>Verizon Response: Verizon Business is working to remediate this.</i></p>
120	<p>[REDACTED] vault cover was missing bolts (not properly secured).</p> <p><i>Verizon Response: Verizon Business is working to remediate this.</i></p>
121	<p>[REDACTED] Verizon vault cover was missing bolts (not properly secured).</p> <p><i>Verizon Response: Verizon Business is working to remediate this.</i></p>

<b>Location</b>	<b>Violation Description</b>
123	<p>██████████ Verizon vault cover was missing bolts (not properly secured).</p> <p><a href="#">Verizon Response: Verizon Business is working to remediate this.</a></p>
124	<p>██████████ Verizon vault cover was missing bolts (not properly secured).</p> <p><a href="#">Verizon Response: Verizon Business is working to remediate this.</a></p>
126	<p>██████████ Verizon vault cover was missing bolts (not properly secured).</p> <p><a href="#">Verizon Response: Verizon Business is working to remediate this.</a></p>