STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

May 14, 2025 CA2025-1242

Ross Johnson
AT&T Director of Regulatory Relations
430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T San Francisco and San Mateo County Region

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Joe Murphy and Javier Reyes of ESRB staff conducted a CIP audit of AT&T's San Francisco and San Mateo County region from February 10 to February 14, 2025. During the audit, ESRB staff conducted field inspections of AT&T's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than June 13, 2025, by electronic copy of all corrective actions and preventive measures taken by AT&T to correct the identified violations and prevent the recurrence of such violations.

Please note that ESRB will be posting the audit report and your response to the audit on the CPUC website. If there is any information in your response that you want us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Joe Murphy at (415) 308-4159 or muj@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC CIP Audit Report for AT&T San Francisco and San Mateo County Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Chihsien “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
Joe Murphy, Utilities Engineer, ESRB, SED, CPUC
Javier Reyes, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Josh Alvarado, Lead Regulatory Relations, AT&T
Saira Pasha, Regulatory & Legislative Affairs, AT&T

CPUC AUDIT FINDINGS OF AT&T

SAN FRANCISCO and SAN MATEO COUNTIES

FEBRUARY 10 - 14, 2025

I. Records Review

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

- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines Procedure
- AT&T's Facility Statistics of the San Francisco and San Mateo Counties service areas
- AT&T's List of Facility Locations
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the last 5 years (December 2019 – November 2024)
- Most Recent Work Orders Conducted in the last 5 years (December 2019 – November 2024)
- Pole Loading Calculations Conducted in the last 12 months (December 2023 – November 2024)
- Safety Hazard Notifications AT&T received and sent to Third Parties in the last 5 years (December 2019 – November 2024)
- New Construction Projects Completed in the last 12 months (December 2023 – November 2024)

II. Records Violations

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

1. **GO 95, Rule 18-B1(a), Maintenance Programs** states in part:

> *"The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:*
>
> *(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:*
> - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
>
> *(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
> - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified*

company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:

- *Take corrective action within 60 months subject to the exception specified below."*

AT&T's Overhead Lines Maintenance Plan assigns the following work order priority levels:

Priority Level	Required Due Date
1	• 72 hours
2	• 36 months
2a	• 12 months
2b	• 12 months if in Fire Map Tier 2 • 6 months if in Fire Map Tier 3 • 36 months if in Fire Map Tier 1
2c	• 12 months if in Fire Map Tier 2 and 1 • 6 months if in Fire Map Tier 3
3	• 60 months

ESRB's review of AT&T's overhead work orders from December 1, 2019 through November 30, 2024 found that 673 out of 5,513 (or 12.2%) 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 1A below breaks down the 673 late overhead work orders by priority level.

Table 1A: Late Overhead Facility Work Orders

Priority Level	Late-Pending Work Orders[1]	Late-Complete Work Orders	Total Late Work Orders	Total Tags Created	Percentage Late
1	0	88	88	120	73.3%
2	27	46	73	1,812	4.0%
2a	4	75	79	107	73.8%
2b	43	271	314	785	40.0%
2c	8	20	28	47	59.6%
3	91	0	91	2,642	3.4%
Total	173	500	673	5,513	12.2%

The 173 late-pending work orders are included in Appendix A. AT&T must provide

[1] As of December 1, 2024.

ESRB with its corrective action plan to complete the 173 late-pending overhead work orders and its preventive measures to prevent any work orders from being completed late in the future.

The most overdue pending work orders are listed in Table 1B below:

Table 2B: Most Overdue Pending Facility Work Orders

Work Order Package ID	Priority	HFTD Tier[2]	Creation Date	Due Date	Number of Days Late[3]
1078656	2b	3	3/27/2022	7/18/2022	867
1070860	2c	2	3/21/2022	1/13/2023	688
1079008	2a	2	3/27/2022	1/13/2023	688
758739	2	3	1/13/2021	9/18/2023	440
529231	3	3	12/14/2019	8/12/2024	111

2. 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.*
>
> *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."*

ESRB's review of AT&T's underground work orders from December 1, 2019 through November 30, 2024 found that 56 out of 3,048 (or 1.8%) underground work orders are late. Late-pending work orders are pending work orders that have not been completed by their assigned due date, and late-closed work orders are work orders that were completed past their assigned due date. Table 2 below breaks down the 56 late Underground work orders.

Table 2: Late Underground Facility Work Orders

	Late-Pending Work Orders[4]	Late-Complete Work Orders	Total Late Work Orders	Total Tags Created	Percentage Late
Total	2	54	56	3,048	1.8%

[2] As assigned in AT&T's response to Pre Audit Data Request 8. GO95 SF & SM
[3] As of December 1, 2024.
[4] As of December 1, 2024

The 2 late-pending work orders are included in Appendix B. AT&T must provide ESRB with its corrective action plan to complete the 2 late-pending underground work orders and its preventive measures to prevent any work orders from being completed late in the future.

3. **GO 95, Rule 80.1.A.(2) – Statewide Inspection Requirements** states in part:

   "Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State."

   AT&T does not specify an inspection interval for patrols and? lacks a methodology for conducting and recording patrols of its Communication Lines in non-HFTD areas. ESRB notes that AT&T's Visual Inspections of Overhead Lines G.O. 95 Rule 80.1A Section 4.1.4 Inspection Intervals Table 1 calls for patrols of Fire-Threat Tier 1[5] areas at 15-year (Southern California) or 20-year (Northern California) intervals. Additionally, Section 5.1.1 GIS Analysis of Aerial Cable Records does not provide a methodology to conduct, record, nor analyze inspections of facilities in Tier 1 or in non-HFTD areas.

4. **GO 95, Rule 80.1.A.(4) – Record Keeping** states:

   "Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a)."

   a. AT&T's inspection data provided to ESRB is missing the personnel who performed each inspection, and the personnel who performed each corrective action.[6]

   b. AT&T does not have patrol records of all facility inspections in Tier 2 and Tier 3 areas. Tier 3 and Tier 2 areas require annual and biannual patrol inspections respectively. ESRB's review of patrol and detailed inspection for the selected Distribution Areas (DAs) below in Table 3 show missing inspection records. Tier 3 areas require annual patrol and 5-year detailed inspections. These requirements create 3 to 4 patrols and 1 detailed inspection in the 5-year audit review window[7], which produces a ratio of

[5] Tier 1 is a High Hazard Zone (HHZ) designation by the U.S. Forest Service- California Department of Forestry and Fire Protection's (CAL FIRE). These areas are outlined on the joint map of tree mortality HHZs. Tier 1 areas are not the same as non-HFTD areas. Source: https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking

[6] AT&T response to Pre Audit Data Request Question 8. GO95 SF & SM

[7] A detailed inspection meets the requirement of a patrol inspection and therefore can substitute for a patrol inspection in the year it is conducted.

detailed inspection and patrol inspection ranging from 1:4 to 1:3. Tier 2 areas require biannual patrol and 10-year detailed inspections. These requirements create 1 to 3 patrols and 0 to 1 detailed inspection for each facility in a DA. The number of patrol inspections for each DA noted in Table 3 are far below anticipated levels.

Table 3: Distribution Areas selected for Facility Inspection Review

DA_PSA_CD	UN_DA_NA	CLLI_ID	HFTD Tier	Minimum Number of Facilities within DA[8]	Minimum Number of Expected Patrols 2020-2024 [9]	Actual Patrol Inspections 2020-2024 [10]
R4128	NMPR4128	MNPKCA11	3	45	135	35
443201	NSM443201	SNMTCA11	3	10	30	0
224301	NPD224301	PSCDCA11	2	53	53	15
411301	NSK411301	SNCRCA11	2	14	14	7
417903	NSZ417903	SNBUCA02	2	73	73	4
R2218	NPDR2218	PSCDCA11	2	143	143	34

5. **GO 95, Rule 18-A(5), Resolution of Potential Violations of General Order 95 and Safety Hazards** states:

> *"The A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party."*

ESRB's reviewed AT&T's Third-Party Notifications (TPN) received from other utilities[11] and noted only three incoming notifications (TPN) from electric supply utilities during the audit review period. The electric supply utility records over 2,000 outgoing TPNs to AT&T over the same period. ESRB provided five specific Third-Party Notifications from the electric supply utility that were not recorded in AT&T's list of incoming TPNs for AT&T to analysis. AT&T found four of the five had work orders created to address the identified issue. The results of AT&T review are included in Appendix C.

[8] Minimum number of facilities based on the number of unique facilities with detailed inspections noted in AT&T Response to Post Audit DR: SF SM Detail Inspections
[9] Minimum number of patrols based on the 3 patrol inspections (in addition to 1 detailed inspection) in a 5-year period in HFTD Tier 3 areas, and 1 patrol inspection (in addition to 1 detailed inspection) or 2 patrol inspection (with no detailed inspection)
[10] AT&T Response to Post Audit DR: SF_SM_Patrol_Nonconformance
[11] AT&T response to Pre Audit Data Request Question 10.TPNS from Util

Conversations with AT&T staff indicated that AT&T receives TPNs and enters the notices into the AT&T work order system and creates a work ticket. The work order system lacks a method to identify work orders generated from incoming TPNs per GO 95, Rule 18-A(5). AT&T must develop processes to track incoming TPNs for at least 10 years.

III. Field Inspection

During the field inspection from February 10 - 14, 2025, ESRB staff inspected AT&T's communication facilities in the locations listed in Table 4.

Table 4: Field Inspection Locations

Location #	Structure Type	Approx. Latitude	Approx. Longitude	City
1	UG	37.78833	-122.43083	San Francisco North
2	UG	37.78846	-122.43050	San Francisco North
3	WP	37.78863	-122.43051	San Francisco North
4	UG	37.78922	-122.43065	San Francisco North
5	UG	37.78916	-122.43043	San Francisco North
6	UG	37.78878	-122.43037	San Francisco North
7	UG	37.78847	-122.43028	San Francisco North
8	WP	37.80359	-122.41491	San Francisco North
9	WP	37.80416	-122.41508	San Francisco North
10	WP	37.80439	-122.41512	San Francisco North
11	WP	37.80436	-122.41569	San Francisco North
12	UG	37.80436	-122.41569	San Francisco North
13	WP	37.80439	-122.41546	San Francisco North
14	WP	37.25266	-122.41505	Pescadero
15	WP	37.25173	-122.41540	Pescadero
16	WP	37.25086	-122.41588	Pescadero
17	WP	37.25002	-122.41642	Pescadero
18	WP	37.24993	-122.41645	Pescadero
19	WP	37.24433	-122.39785	Pescadero
20	WP	37.24375	-122.39819	Pescadero
21	WP	37.24276	-122.39816	Pescadero
22	WP	37.24142	-122.39910	Pescadero
23	WP	37.24054	-122.39898	Pescadero
24	WP	37.24011	-122.40032	Pescadero
25	WP	37.23956	-122.40103	Pescadero
26	WP	37.23767	-122.40289	Pescadero
27	WP	37.23665	-122.40379	Pescadero
28	WP	37.25386	-122.37475	Pescadero
29	WP	37.25403	-122.37371	Pescadero
30	WP	37.25429	-122.37310	Pescadero
31	WP	37.21649	-122.34913	Pescadero

Location #	Structure Type	Approx. Latitude	Approx. Longitude	City
32	WP	37.21687	-122.34981	Pescadero
33	WP	37.21683	-122.35010	Pescadero
34	WP	37.21665	-122.35046	Pescadero
35	WP	37.21722	-122.35043	Pescadero
36	WP	37.21787	-122.35113	Pescadero
37	WP	37.24378	-122.40616	Pescadero
38	WP	37.24438	-122.40622	Pescadero
39	WP	37.24495	-122.40641	Pescadero
40	WP	37.24555	-122.40661	Pescadero
41	WP	37.24529	-122.40766	Pescadero
42	WP	37.49393	-122.45464	Half Moon Bay
43	WP	37.49401	-122.45421	Half Moon Bay
44	Cabinet	37.49401	-122.45421	Half Moon Bay
45	WP	37.49401	-122.45404	Half Moon Bay
46	WP	37.49415	-122.45412	Half Moon Bay
47	WP	37.47239	-122.40308	Half Moon Bay
48	WP	37.47321	-122.40419	Half Moon Bay
49	WP	37.47388	-122.40543	Half Moon Bay
50	WP	37.47422	-122.40593	Half Moon Bay
51	WP	37.47586	-122.40816	Half Moon Bay
52	WP	37.47622	-122.40797	Half Moon Bay
53	UG	37.47737	-122.44103	Half Moon Bay
54	WP	37.47776	-122.44143	Half Moon Bay
55	UG	37.47776	-122.44143	Half Moon Bay
56	WP	37.47816	-122.44185	Half Moon Bay
57	WP	37.47816	-122.44185	Half Moon Bay
58	WP	37.47851	-122.44221	Half Moon Bay
59	UG	37.47851	-122.44221	Half Moon Bay
60	WP	37.49255	-122.45223	Half Moon Bay
61	WP	37.49223	-122.45198	Half Moon Bay
62	WP	37.49289	-122.45249	Half Moon Bay
63	WP	37.49288	-122.45304	Half Moon Bay
64	WP	37.49248	-122.45277	Half Moon Bay
65	WP	37.49968	-122.46616	Half Moon Bay

Location #	Structure Type	Approx. Latitude	Approx. Longitude	City
66	WP	37.49926	-122.46644	Half Moon Bay
67	WP	37.49945	-122.46555	Half Moon Bay
68	WP	37.49920	-122.46490	Half Moon Bay
69	Cabinet	37.49986	-122.46563	Half Moon Bay
70	UG	37.50139	-122.46479	Half Moon Bay
71	WP	37.50162	-122.46482	Half Moon Bay
72	WP	37.50187	-122.46469	Half Moon Bay
73	WP	37.50226	-122.46486	Half Moon Bay
74	WP	37.50253	-122.46501	Half Moon Bay
75	WP	37.50292	-122.46542	Half Moon Bay
76	WP	37.62407	-122.47686	Pacifica
77	WP	37.62431	-122.47637	Pacifica
78	WP	37.62448	-122.47597	Pacifica
79	WP	37.62385	-122.47719	Pacifica
80	WP	37.61227	-122.47955	Pacifica
81	WP	37.61251	-122.47955	Pacifica
82	WP	37.61273	-122.47960	Pacifica
83	WP	37.61329	-122.47959	Pacifica
84	WP	37.60332	-122.49796	Pacifica
85	WP	37.60307	-122.49795	Pacifica
86	WP	37.73009	-122.46300	San Francisco SW
87	WP	37.72969	-122.46198	San Francisco SW
88	WP	37.72975	-122.46227	San Francisco SW
89	WP	37.72967	-122.46138	San Francisco SW
90	UG	37.71421	-122.46699	San Francisco SW
91	WP	37.71395	-122.46706	San Francisco SW
92	Cabinet	37.71421	-122.46699	San Francisco SW
93	WP	37.71362	-122.46706	San Francisco SW
94	UG	37.68962	-122.47384	Daly City
95	UG	37.68779	-122.47311	Daly City
96	WP	37.68779	-122.47311	Daly City
97	UG	37.68781	-122.47283	Daly City
98	Manhole	37.74071	-122.38463	San Francisco SE
99	Cabinet	37.74071	-122.38462	San Francisco SE

Location #	Structure Type	Approx. Latitude	Approx. Longitude	City
100	UG	37.74087	-122.38437	San Francisco SE
101	WP	37.75254	-122.39405	San Francisco SE
102	WP	37.75299	-122.39375	San Francisco SE
103	WP	37.75302	-122.3936	San Francisco SE
104	WP	37.75302	-122.39358	San Francisco SE
105	WP	37.73021	-122.37238	San Francisco SE
106	WP	37.73012	-122.37190	San Francisco SE
107	WP	37.73107	-122.37393	San Francisco SE

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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.*
>
> *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 5.

Table 5: GO 95, Rule 31.1 Findings

Location #	Findings
8	Broken lashing
9	Broken lashing
21	Broken lashing
21	Missing vis strips
23	Missing vis strips
24	Broken lashing
25	Broken lashing
25	Missing vis strips

Location #	Findings
25	Pole lean more than 10%
27	Broken lashing
29	Broken lashing
30	>10% lean
37	broken lashing
41	Broken lashing
42	Leaning >13%
47	Pole down
48	Line down, pole down
49	Line down
50	Pole leaning, broken
63	Complete transfer
86	Complete transfer

2. **GO 95, Rule 31.6, Abandoned Lines** states:

> *"Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use."*

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

Table 6: GO 95, Rule 31.6 Findings

Location #	Findings
75	Abandoned equipment
80	Abandoned drop/idle, loose facilities
85	Abandoned line on ground
75	Abandoned drop

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

"Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. 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). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule."

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

Table 7: GO 95, Rule 35 Finding

Location #	Finding
51	Strain/abrasion on line from tree branch.

4. **GO 95, Rule 37, Table 1, Case 4.B** requires the following:

   The vertical clearance for communication conductors above areas capable of being traversed by agricultural clearance is 15 feet.

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

Table 8: GO 95, Rule 37, Table 1, Case 4.B Finding

Location #	Finding
26	Clearance over agricultural area 12' 6"

5. **GO 95, Rule 38, Table 2, Case 3-C** requires the following:

   The clearance between communication conductors not supported on the same poles is 24 inches.

ESRB's finding related to the above rule is listed in Table 9.

Table 9: GO 95, Ruel 38, Table 2, Case 3-C Finding

Location #	Finding
83	Service line is attached to another comm provider's line midspan

6. **GO 95, Rule 38, Table 2, Case 10-C** requires the following:

   The Vertical separation between supply conductors and/or cables (750 – 7,500V)[12], on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole requires at least 48 inches of separation from communication conductors.

[12] If the supply conductors are 7,500-20,000V, the separation requirement is 72 inches, Case 11-C. The finding assumes the supply lines in the area are 4,200V PP.

ESRB's finding related to the above rule is listed in Table 10.

Table 10: GO 95, Rule 38, Table 2, Case 10-C Finding

Location #	Finding
9	Less than 4 ft to supply

7. GO 95, Rule 38, Table 2, Case 16-C requires the following:

The radial separation of conductors on the same crossarm, pole or structure between conductors, taps or lead wires of different circuits requires at least three inches of separation from communication conductors.

ESRB's findings related to the above rule are listed in Table 11.

Table 11: GO 95, Rule 38, Table 2, Case 16-C Findings

Location #	Findings
20	Clearance to comm line
31	Housekeeping/clearance to other lines
82	Service drop contacting other communications drop
93	Housekeeping/clearance to other lines

8. GO 95, Rule 49.1-A(1), Poles, Towers and Other Structures, Strength states:

"Wood poles shall be of sound timber.."

ESRB's finding related to the above rule is listed in Table 12:

Table 12: GO 95, Rule 49.1-A(1) Finding

Location #	Finding
20	Pole is broken, break is horizontal to ½ depth of diameter.

9. GO 95, Rule 84.4-A(3), Clearances, Accessible to Pedestrians Only states:

> *"Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet."*

ESRB's findings related to the above rule are listed in Table 13.

Table 13: GO 95, Rule 84.4-A(3) Findings

Location #	Findings
52	Low clearance to ground/slope, pedestrian only access
106	Low line over sidewalk, pedestrian accessible area

10. GO 95, Rule 84.4-A(6), Clearances, Across or along Public Thoroughfares, states:

> *"Communication conductors over or across public thoroughfares shall have a clearance of 18 feet above ground (Table 1, Case 3, Column B). A reduced clearance to 16 feet is permitted for the portions of communication conductors where no part of the line overhangs any part of the thoroughfare which is ordinarily traveled, or where the line is behind an established curb, ditch or berm that serves to protect such communication conductors from encroachment by vehicular traffic."*

ESRB's finding related to the above rule is listed in Table 14.

Table 14: GO 95, Rule 84.4-A(6) Finding

Location #	Finding
103	Low line over center of road, 16 ft.

11. GO 95, Rule 84.6-D Vertical Runs states in part:

> *"Runs of bridled conductors, attached to surface of pole, need not be covered provided such runs are below the guard arm and in the same quadrant as the longitudinal cable, or where such runs are below and on the same side of pole with a cable arm and are not in the climbing space, or are connected to service drops which are placed in accordance with the provisions of Rule 84.8–B2b. Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches."*

ESRB's findings related to the above rule are listed in Table 15.

Table 15: GO 95, Rule 84.6-D Findings

Location #	Findings
3	Loose vertical cables, >24" between supports
10	Loose vertical cables, >24" between supports
11	Loose vertical cables, >24" between supports
17	Loose vertical cables, >24" between supports
30	Loose vertical cables, >24" between supports
54	Loose vertical cables, >24" between supports
64	Loose vertical cables, >24" between supports
77	Loose vertical cables, >24" between supports
96	Loose vertical cables, >24" support/missing riser.
104	Loose vertical cables, >24" support/missing riser.
106	Loose vertical cables, >24" support/missing riser.

12. GO 95, Rule 84.8-C(1) – Service Drops, Clearances above Ground and Buildings, Above Public Throughfares, states:

"Vertical clearance shall not be less than 18 feet.

EXCEPTION: Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line. In no case shall the clearance at the center line be less than 18 feet. Where there are no curbs, the foregoing provisions shall apply using the outer limits of normal longitudinal vehicular movement in lieu of a curb line."

ESRB's finding related to the above rule is listed in Table 16.

Table 16: GO 95, Rule 84.8-C(1) Finding

Location #	Finding
62	Low service drop

13. GO 95, Rule 84.8-D(4) – Service Drops, Clearances between Conductor, Above or below Supply Service Drops, states in part:

"The radial clearance between communication service drop conductors and supply service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches"

ESRB's findings related to the above rule are listed in Table 17:

Table 17: GO 95, Rule 84.8-C(4) Findings

Location #	Findings
9	Clearance, service drop to supply service drop.
82	Service drop attached to supply service drop.

14. GO 95, Rule 86.2, Guys, 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."

ESRB's findings related to the above rule are listed are Table 18:

Table 18: GO 95, Rule 86.2 Findings

Location #	Findings
14	Missing/broken down guy (corroded)
15	Missing/broken down guy (corroded)
20	Buried/corroded anchor and down guy
58	Slack down guy
67	Buried down guy anchor
84	Slack down guy

15. GO 95, Rule 86.4-C(4), Clearances, Passing on Same Poles states:

"The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall be not less than as specified in Table 2, Case 19 except that the clearance between guys and communication messenger and/or able attached directly to surface of pole may be less than the 3 inches specified in Table 2, Case 19, Column C provided: the guy is not a guy in proximity, or all parts of the guy are not less than 6 feet below 0 - 750 volt supply conductors supported on same pole, and a wood guard or equivalent is placed on the messenger and/or cable; also, a guy attached to a pole which supports supply conductors at a distance of not less than 6 feet above communication messenger and/or cable shall (1) have an insulator placed in the guy above the communication messenger and/or cable, at a distance of not less than 6 feet horizontally from the pole, or (2) have an insulator placed in the guy not less than 3 inches nor more than 6 inches above the messenger and/or cable, and a wood guard or equivalent placed on the messenger and/or cable."

ESRB's findings related to the above rule are listed in Table 19:

Table 19: GO 95, Rule 86.4-C(4) Findings

Location #	Findings
26	Service line contacting electrical span guy.
27	Service line contacting down guy.

16. GO 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."

ESRB's finding related to the above rule is listed in Table 20:

Table 20: GO 95, Rule 86.9 Finding

Location #	Finding
91	Down guy marker above pedestrian height.

17. 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 21:

Table 21: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
64	Riser cover broken/missing at base.
105	Riser cover lifted from pole.
107	Riser cover lifted from pole.

18. GO 95, Rule 91.3 – C, Joint Poles or Poles Jointly Use, Stepping states in part:

"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the step."

ESRB's finding related to the above rule is listed in Table 22:

Table 22: GO 95, Rule 91.3-C Finding

Location #	Finding
30	Pole step less than 6 ft. from platform.

19. 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 findings related to the above rule are listed in Table 23:

Table 23: GO 128, Rule 17.1 Findings

Location #	Findings
53	Lifted hook on lid
59	Broken enclosure lid
94	Broken lid enclosure, missing attachments.

20. GO 18, Rule 18-B(1) Maintenance Programs states in part:

"*Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules."*

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."

During the field audit, ESRB observed the following existing non-conformances with past due corrective actions. ESRB findings related to the above rules are listed in Table 24:

Table 24: Observed Field Findings with Past Due Work Orders

Loc	Non-conformance	GO / Rule	"MarkIt" Job Number	HFTD Tier	Due Date
28	Broken lashing	95/31.1	100861934	Tier 2	Feb 8, 2025
64	Broken riser cover	95/87.7-D(1)	100519033	Non-HFTD*	Feb 10, 2025

*Location is in a Non-HFTD area. AT&T work order records the Fire Tier as "3"

21. 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."*

ESRB observed the following non-conformances during the field portion of the audit. AT&T has previously noted these non-conformances and has pending work orders to correct the non-conformances. ESRB observed non-conformances with pending work orders are listed in Table 25.

Table 25: Observed Field Findings with Pending Work Orders

Loc	Non-conformance	GO / Rule	"MarkIt" Job Number	HFTD Tier
46	Broken lashing	95/31.1	100519370	Non-HFTD*
60	Complete facility transfer	95/31.6	100717590	Non-HFTD*
60	Vegetation clearance	95/35	100815216	Non-HFTD*
65	Vertical cable support	95/84.6-D	100519005	Non-HFTD*
101	Loose hardware, low service drop	95/84.8-C(1)	100545556	Non-HFTD*

*Location is in a Non-HFTD area. AT&T work order recorded the Fire Tier as "3"

V. Observations

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 observed the following third-party findings during the audit. AT&T must issue third-party notifications to the respective utilities for these findings. ESRB's findings related to the above rule are listed in Table 26:

Table 26: GO 95, Rule 18-A Observations

Location #	Findings
3	Supply down guy missing marker
9	Clearance, supply to span guy
25	Communications line down
26	Supply span guy contacting comm line
45	Unauthorized Third-Party Attachment
64	Loose communications vertical cables, >24" between supports
68	Loose communications riser cover (near school)

73	Exposed supply ground (Note: Corrected in field)
74	Clearance, ground down guy to adjacent insulator
82	Loose communications vertical cables, >24" between supports.
82	Service drop attached to supply drop.
88	Supply broken ground cover
91	Supply drop clearance to communications lines.
91	Loose communications riser cover, unsupported vertical conductor >24"
92	U-verse power cabinet not labeled with new ownership.
96	Loose communications vertical cables, >24" between supports.
99	U-verse power cabinet not labeled with new ownership.
101	Slack communications down guy
102	Clearance between communications lines.
104	Loose communications vertical cables, >24" between supports.
106	Supply down guy clearance to communications.

2. **GO 95, Rule 18-B(1)(a)(ii), Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards, Maintenance Programs** states:

"Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:

• Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed:

(1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District;

(2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District;

(3) 12 months for potential violations that compromise worker safety; and

(4) 36 months for all other Level 2 potential violations. A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party."

GO 95, Rule 21.2-D Districts, High Fire-Threat District states in part:

"High Fire-Threat District means those areas comprised of the following:

(2) ***Tier 2*** *is Tier 2 of the CPUC Fire-Threat Map.*

(3) ***Tier 3*** *is Tier 3 of the CPUC Fire-Threat Map."*

ESRB's review of AT&T's work orders noted that more than 200 notifications incorrectly list the Fire Tier as Fire Tier 3 in Non-HFTD districts.[13] ESRB acknowledges that AT&T's notification system defaults to the highest Fire Tier when no Fire Tier is entered, and this method avoids under prioritizing repairs. ESRB notes that this method produces inconsistencies between repair and inspection records for the same facility.

[13] AT&T response to Pre Audit Data Request Question 8. GO95 SF & SM-Analysis

Appendix A: Late-Pending Overhead Facility Work Orders

Work Order Package ID	Priority	HFTD Tier**	Creation Date	Due Date	Number of Days Late*
1078656	2b	3	3/27/2022	7/18/2022	867
1070860	2c	2	3/21/2022	1/13/2023	688
1079008	2a	2	3/27/2022	1/13/2023	688
1077983	2b	2	3/27/2022	1/13/2023	688
1078360	2a	2	3/27/2022	1/16/2023	685
1078613	2b	2	3/27/2022	1/17/2023	684
1078586	2b	2	3/27/2022	1/17/2023	684
1078776	2b	2	3/27/2022	1/17/2023	684
1078658	2c	2	3/27/2022	1/18/2023	683
1079655	2b	2	3/27/2022	1/19/2023	682
1078758	2c	2	3/27/2022	1/20/2023	681
1078751	2b	2	3/27/2022	1/20/2023	681
1066817	2b	2	3/18/2022	1/21/2023	680
1079724	2b	2	3/27/2022	1/22/2023	679
1066717	2b	2	3/18/2022	1/24/2023	677
1066751	2b	2	3/18/2022	1/25/2023	676
1079156	2b	2	3/27/2022	1/27/2023	674
1066788	2b	2	3/18/2022	1/28/2023	673
1056929	2a	2	3/10/2022	3/10/2023	632
758739	2	3	1/13/2021	9/18/2023	440
758656	2	3	1/13/2021	9/21/2023	437
758700	2	3	1/13/2021	9/21/2023	437
1346978	2b	3	9/8/2023	10/12/2023	416
1346979	2b	3	9/8/2023	10/12/2023	416
1346976	2b	3	9/8/2023	10/12/2023	416
1346985	2b	3	9/8/2023	10/12/2023	416
1346987	2b	3	9/8/2023	10/12/2023	416
1346977	2b	3	9/8/2023	10/12/2023	416
1346983	2b	3	9/8/2023	10/12/2023	416
708419	2	1	10/15/2020	10/14/2023	414
1276720	2b	1	5/3/2023	10/17/2023	411
1276745	2b	3	5/3/2023	10/18/2023	410
1288692	2c	1	5/25/2023	11/25/2023	372
1313725	2b	1	7/12/2023	1/12/2024	324
763999	2	1	1/24/2021	1/23/2024	313
768854	2	1	1/30/2021	1/29/2024	307
776479	2	1	2/5/2021	2/4/2024	301
777410	2b	1	2/8/2021	2/7/2024	298
795432	2	3	3/4/2021	3/3/2024	273
1350245	2b	2	9/12/2023	3/12/2024	264
1346959	2a	3	9/8/2023	4/12/2024	233

Work Order Package ID	Priority	HFTD Tier**	Creation Date	Due Date	Number of Days Late*
1333582	2b	2	8/8/2023	4/21/2024	224
825323	2	1	5/4/2021	5/4/2024	211
1376324	2b	3	11/4/2023	5/5/2024	210
830013	2b	1	5/13/2021	5/13/2024	202
868411	2	1	7/8/2021	7/8/2024	146
875438	2	3	7/31/2021	7/30/2024	124
880744	2	1	8/6/2021	8/5/2024	118
1028685	2	2	1/23/2022	8/5/2024	118
1028637	2	2	1/23/2022	8/5/2024	118
1028630	2	2	1/23/2022	8/5/2024	118
1028625	2	2	1/23/2022	8/6/2024	117
1028634	2	2	1/23/2022	8/6/2024	117
1028636	2	2	1/23/2022	8/6/2024	117
1028709	2	2	1/23/2022	8/7/2024	116
1028710	2	2	1/23/2022	8/7/2024	116
1028712	2	2	1/23/2022	8/7/2024	116
1028703	2	2	1/23/2022	8/7/2024	116
1028699	2	2	1/23/2022	8/7/2024	116
1028730	2	2	1/23/2022	8/7/2024	116
1421982	2b	3	2/7/2024	8/8/2024	115
1028735	2	2	1/23/2022	8/10/2024	113
1028732	2	2	1/23/2022	8/10/2024	113
1028733	2	2	1/23/2022	8/10/2024	113
529231	3	3	12/14/2019	8/12/2024	111
528793	3	3	12/14/2019	8/12/2024	111
528808	3	3	12/14/2019	8/12/2024	111
528836	3	3	12/14/2019	8/12/2024	111
529184	3	3	12/14/2019	8/12/2024	111
528906	3	3	12/14/2019	8/12/2024	111
528895	3	3	12/14/2019	8/12/2024	111
529166	3	3	12/14/2019	8/12/2024	111
529225	3	3	12/14/2019	8/12/2024	111
528953	3	3	12/14/2019	8/12/2024	111
528790	3	3	12/14/2019	8/12/2024	111
1470136	2c	3	5/8/2024	8/15/2024	108
1470135	2c	3	5/8/2024	8/15/2024	108
1429398	2b	3	2/19/2024	8/19/2024	104
1429114	2b	1	2/19/2024	8/19/2024	104
1429148	2b	1	2/19/2024	8/19/2024	104
1470124	2b	3	5/8/2024	8/20/2024	103
1470087	2b	3	5/8/2024	8/20/2024	103
1470085	2b	3	5/8/2024	8/20/2024	103
1470116	2b	3	5/8/2024	8/20/2024	103

Work Order Package ID	Priority	HFTD Tier**	Creation Date	Due Date	Number of Days Late*
1470118	2b	3	5/8/2024	8/20/2024	103
1470120	2b	3	5/8/2024	8/20/2024	103
1470137	2c	3	5/8/2024	8/20/2024	103
1470086	2b	3	5/8/2024	8/21/2024	102
1470084	2b	3	5/8/2024	8/21/2024	102
1470125	2c	3	5/8/2024	8/21/2024	102
900838	2b	1	9/1/2021	8/31/2024	92
1442112	2b	1	3/14/2024	9/14/2024	78
526103	3	2	12/12/2019	9/25/2024	67
526310	3	2	12/12/2019	9/25/2024	67
526133	3	2	12/12/2019	9/25/2024	67
526263	3	2	12/12/2019	9/25/2024	67
526231	3	2	12/12/2019	9/25/2024	67
526132	3	2	12/12/2019	9/25/2024	67
526385	3	2	12/12/2019	9/25/2024	67
526390	3	2	12/12/2019	9/25/2024	67
526119	3	2	12/12/2019	9/25/2024	67
526508	3	2	12/12/2019	9/25/2024	67
526480	3	2	12/12/2019	9/25/2024	67
526426	3	2	12/12/2019	9/25/2024	67
526184	3	2	12/12/2019	9/25/2024	67
526275	3	2	12/12/2019	9/25/2024	67
526415	3	2	12/12/2019	9/25/2024	67
526264	3	2	12/12/2019	9/25/2024	67
526237	3	2	12/12/2019	9/25/2024	67
526653	3	2	12/12/2019	9/25/2024	67
526158	3	2	12/12/2019	9/25/2024	67
526395	3	2	12/12/2019	9/25/2024	67
526559	3	2	12/12/2019	9/25/2024	67
526648	3	2	12/12/2019	9/25/2024	67
526600	3	2	12/12/2019	9/25/2024	67
526174	3	2	12/12/2019	9/25/2024	67
526618	3	2	12/12/2019	9/25/2024	67
526507	3	2	12/12/2019	9/25/2024	67
526552	3	2	12/12/2019	9/25/2024	67
526606	3	2	12/12/2019	9/25/2024	67
526381	3	2	12/12/2019	9/25/2024	67
526326	3	2	12/12/2019	9/25/2024	67
526534	3	2	12/12/2019	9/25/2024	67
526568	3	2	12/12/2019	9/25/2024	67
526114	3	2	12/12/2019	9/25/2024	67
526239	3	2	12/12/2019	9/25/2024	67
526571	3	2	12/12/2019	9/26/2024	66

Work Order Package ID	Priority	HFTD Tier**	Creation Date	Due Date	Number of Days Late*
526474	3	2	12/12/2019	9/26/2024	66
526565	3	2	12/12/2019	9/26/2024	66
526607	3	2	12/12/2019	9/26/2024	66
526450	3	2	12/12/2019	9/26/2024	66
526266	3	2	12/12/2019	9/26/2024	66
526440	3	2	12/12/2019	9/26/2024	66
526128	3	2	12/12/2019	9/26/2024	66
526643	3	2	12/12/2019	9/26/2024	66
526567	3	2	12/12/2019	9/26/2024	66
526525	3	2	12/12/2019	9/26/2024	66
526481	3	2	12/12/2019	9/26/2024	66
526250	3	2	12/12/2019	9/26/2024	66
526270	3	2	12/12/2019	9/26/2024	66
526428	3	2	12/12/2019	9/26/2024	66
526410	3	2	12/12/2019	9/26/2024	66
526134	3	2	12/12/2019	9/26/2024	66
526321	3	2	12/12/2019	9/26/2024	66
526288	3	2	12/12/2019	9/26/2024	66
526551	3	2	12/12/2019	9/26/2024	66
526327	3	2	12/12/2019	9/26/2024	66
526494	3	2	12/12/2019	9/26/2024	66
526177	3	2	12/12/2019	9/26/2024	66
526291	3	2	12/12/2019	9/26/2024	66
526173	3	2	12/12/2019	9/26/2024	66
526417	3	2	12/12/2019	9/26/2024	66
526449	3	2	12/12/2019	9/26/2024	66
526420	3	2	12/12/2019	9/26/2024	66
526429	3	2	12/12/2019	9/26/2024	66
526595	3	2	12/12/2019	9/26/2024	66
526124	3	2	12/12/2019	9/26/2024	66
526478	3	2	12/12/2019	9/26/2024	66
526483	3	2	12/12/2019	9/26/2024	66
526340	3	2	12/12/2019	9/26/2024	66
526599	3	2	12/12/2019	9/26/2024	66
526307	3	2	12/12/2019	9/26/2024	66
526367	3	2	12/12/2019	9/26/2024	66
526540	3	2	12/12/2019	9/26/2024	66
526254	3	2	12/12/2019	9/26/2024	66
526153	3	2	12/12/2019	9/26/2024	66
526146	3	2	12/12/2019	9/26/2024	66
526408	3	2	12/12/2019	9/26/2024	66
526553	3	2	12/12/2019	9/26/2024	66
526457	3	2	12/12/2019	9/26/2024	66

Work Order Package ID	Priority	HFTD Tier**	Creation Date	Due Date	Number of Days Late*
526143	3	2	12/12/2019	10/1/2024	61
526349	3	2	12/12/2019	10/1/2024	61
954602	2b	1	11/9/2021	11/9/2024	22

*As of December 1, 2024

**AT&T uses a default of HFTD Tier 3 when no HFTD is entered on work orders requests. This will overstate the number of work orders that are present in HFTD Tier 3 areas.

Appendix B: Late-Open Underground Facility Work Orders

Work Order Package ID	Creation Date	Due Date	Number of Days Late*
1525935	7/18/2024	7/21/2024	133
1568277	10/17/2024	10/20/2024	42

*As of December 1, 2024

Appendix C: Partial List of Incoming Third-Party Notifications not logged by AT&T

TPN #	Description	Date received	AT&T Ticket
129054136	Low comm drop over the street, 13.5 ft.	6/20/2024	1639743
129059426	Facility Transfer	6/20/2024	1639741
129071117	Communications down guy not taut	6/25/2024	1639742
129071247	Broken communications lashing	6/24/2024	1639747
129072390	Abandoned communications lines	No record	None