STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

Aug 19, 2025 CA2025-1243

Saira Pasha
Area Manager - Regulatory
AT&T Services, Inc.
430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Placer, El Dorado and Amador County Region

Ms. Pasha:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Joe Murphy and Matthew Yunge of ESRB staff conducted a CIP audit of AT&T's Placer, El Dorado and Amador County region from June 2 to June 6, 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 September 18, 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 Placer, El Dorado and Amador 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
Matthew Yunge, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Ross Johnson, Director-Regulatory, AT&T Services, Inc.
Josh Mathisen, Director-Regulatory, AT&T Services, Inc.

CPUC AUDIT FINDINGS OF AT&T

PLACER, EL DORADO, and AMADOR COUNTIES

JUNE 2 - 6, 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 Placer, El Dorado, and Amador Counties service areas
- AT&T's List of Facility Locations
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the last 5 years (March 1, 2020, through February 28, 2025)
- Most Recent Work Orders Conducted in the last 5 years (March 1, 2020, through February 28, 2025)
- Pole Loading Calculations Conducted in the last 12 months (March 1, 2024, through February 28, 2025)
- Safety Hazard Notifications AT&T received and sent to Third Parties in the last 5 years (March 1, 2020, through February 28, 2025)
- New Construction Projects Completed in the last 12 months (March 1, 2024, through February 28, 2025)

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 March 1, 2020 through February 28, 2025 found that 5,251 out of 26,530 (or 19.8%) 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. ESRB's analysis found that 4,717 work orders (3,535 late pending and 1,182 closed) are more than 60 days past due. Table 1 below breaks down the 5,251 late overhead work orders by priority level.

Table 1: 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	105	105	139	75.5%
2	1,897	1,217	3,114	7,705	40.4%
2a	502	14	516	621	83.1%
2b	897	366	1,263	2,516	50.2%
2c	241	12	253	287	88.2%
3	0	0	0	15,262	0%
Total	3,537	1,714	5,251	26,530	19.8%

[1] As of February 28, 2025.

AT&T must provide ESRB with its corrective action plan to complete the 3,537 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 2 below:

Table 2: Most Overdue Pending Facility Work Orders

Work Order Package ID	Priority	HFTD Tier[2]	Creation Date	Due Date	Number of Days Late[3]
772281	2b	3	2/2/2021	4/23/2021	1407
772316	2b	3	2/2/2021	4/23/2021	1407
772282	2b	3	2/2/2021	4/23/2021	1407
768400	2c	3	1/30/2021	4/28/2021	1402
768395	2c	3	1/30/2021	4/28/2021	1402
772318	2c	3	2/2/2021	4/29/2021	1401
627991	2b	2	5/6/2020	5/6/2021	1394
785857	2b	2	2/25/2021	11/6/2021	1210
910441	2b	2	9/8/2021	5/12/2022	1023
772195	2a	3	2/2/2021	10/28/2021	1219
772196	2a	3	2/2/2021	10/30/2021	1217
773390	2a	3	2/3/2021	11/4/2021	1212
642489	2	1[4]	5/26/2020	5/26/2023	644
675967	2	1	7/22/2020	7/22/2023	587
681664	2	1	8/7/2020	8/7/2023	571

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 March 1, 2020 through February 28, 2025 found that three (3) out of 80 (or 3.7%) underground work orders

[2] As assigned in AT&T's response to Pre Audit Data Request 8. Orders Amador_El Dorado_Placer
[3] No late pending underground work orders as of February 28, 2025.
[4] Tier 1 (Zone 1) is a High Hazard Zone (HHZ) designation by the U.S. Forest Service- California Department of Forestry and Fire Protection's (CAL FIRE). In context, AT&T's response: 8. Orders Amador_El Dorado_Placer uses Tier 1 (incorrectly) to indicate all non-HFTD Tier 2 and Tier 3 areas.

were completed past their assigned due date. Table 3 below breaks down the three (3) late underground work orders.

Table 3: Late Underground Facility Work Orders

	Late-Pending Work Orders[5]	Late-Complete Work Orders	Total Late Work Orders	Total Tags Created	Percentage Late
Total	0	3	3	80	3.7%

3. **GO 95, Rule 80.1.A(1) Inspection Requirements for Communication Lines: Patrol and Detailed Inspections, Inspection Requirements for Joint-Use Poles in High Fire-Treat District** states in part:

"In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines … shall not exceed the time specified in the following Table.

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

…the term "year" is defined as 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months, not to exceed the end of the calendar year in which the next inspection is due."

ESRB's review of AT&T's Inspection History [6] from March 1, 2020 through February 28, 2025 found that 441 Distribution Area (DA) inspections were completed past their required reinspection date. This includes 247 of 248 DAs in Tier 3 areas. Each DA is composed of 75 facilities on average. Table 4 below breaks down the 441 late inspections by HFTD Tier.

Table 4: Late Distribution Area (DA) Inspections by HFTD Tier

HFTD	Late DA Inspections [7]	Total DA Inspections	Percentage Late
Tier 2	194	1,563	12.4%
Tier 3	247	1,239	19.9%
Total	**441**	**2,802**	**15.7%**

[5] As of February 28, 2025.
[6] AT&T response to Pre Audit Data Request Question 6. Inspection History Amador, El Dorado, Placer
[7] Each DA has an average of 75 facilities. The late inspections cover an estimated 33,000 facilities inspections over the 5-year period.

The latest patrol inspections are listed in Table 5 below:

Table 5: Late Facility Inspections

UN_DA_NA	CLLI_ID	HFTD Tier [8]	Inspection Date	Next Inspection Due Date [9]	Next Inspection Date	Number of Days Late [10]
NGE221101	GRTWCA11	3	4/7/2022	8/1/2023	12/13/2023	134
NPZ120340	PLVLCA11	3	4/4/2022	8/1/2023	12/5/2023	126
NPZ0898	PLVLCA11	3	4/6/2022	8/1/2023	12/6/2023	127
NGE320201	GRTWCA11	2	5/11/2021	9/1/2023	12/5/2023	95
NPZ640340	PLVLCA11	2	5/22/2021	9/1/2023	12/3/2023	93

AT&T must implement practices to ensure that patrol inspections in HFTD areas are conducted at the proper intervals.

4. **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's current Visual Inspections of Overhead Lines G.O. 95 Rule 80.1A[11] Section 4.1.4 Inspection Intervals states, "*The **Tier 1** inspection intervals below were adopted by AT&T after the 2012 CPUC decision ordering Patrol and Detail Inspections. The Patrol Inspections scheduled in **Tier 1** of the CPUC's Fire-Threat ….*" [12]. Table 1 (correctly) specifies Patrol and Detailed Inspection intervals for **Non-HFTD** areas. (**Bold type** added by CPUC for emphasis). "Tier 1" in the text refers to a category that does not exist in Table 1.

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 non-HFTD areas. AT&T notes that technicians patrol one span each side of a service call location. AT&T has not provided evidence that inspection from the "one span either side" patrols have been recorded in non-HFTD Tier 2 and 3 areas. [13]

[8] As assigned in AT&T's response to Pre Audit Data Request 6. Inspection History Amador, El Dorado, Placer

[9] Next inspection due date calculated as 12 months (Tier 3- One year) or 24 months (Tier 2- Two years) starting the first full calendar month after an inspection is performed, plus three full calendar months.

[10] Days late calculated from Next Inspection Due Date based on the 'plus 3 months" criterion to Next Inspection Date.

[11] Revision 4/21/2025.

[12] 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

[13] AT&T response to Pre Audit Data Request Question 6. Inspection History Amador, El Dorado, Placer contains 665 Tier 2 Distribution Areas (DA) and 248 Tier 3 DAs. No inspections outside HFTD Tier 2 or Tier 3 areas are recorded in 6. Inspection History Amador, El Dorado, Placer.

AT&T must provide procedures that are consistent in terminology and implement practices to record patrol inspections of facilities in non-HFTD areas.

5. **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 does not identify the inspection personnel who performed each inspection.[14] [15]

   b. AT&T incorrectly documented the status of Package ID 957082, MarkIt ID 100417492, insufficient clearance from communication to supply conductors. AT&T has recorded the corrective action to be complete.[16] Observations during the field audit found that the work had not been completed. [17]

AT&T must ensure that work orders properly reflect the status of the corrective actions.

[14] AT&T response to Pre Audit Data Request Question 6. Inspection History Amador, El Dorado, Placer
[15] ESRB notes that AT&T provided a list of inspectors in Pre Audit Data Response 6. Osmose Inspector List 2020 2025, but there is no link between the inspector list and the inspections conducted.
[16] AT&T's response to Pre Audit Data Request 8. Orders Amador_El Dorado_Placer, Tab: OH Closed
[17] Field audit location 50.

III. Field Inspection

During the field inspection from June 2 - 6, 2025, ESRB staff inspected AT&T's communication facilities in the locations listed in Table 6.

Table 6: Field Inspection Locations

Location #	Structure Type	Approx. Latitude	Approx. Longitude	City
1	Communication Pedestal	38.94659	-121.10345	Elders Corner
2	Communication Pedestal	38.94680	-121.10345	Elders Corner
3	Communication Vault	38.94606	-121.10357	Elders Corner
4	Communication Pedestal	38.94600	-121.10357	Elders Corner
5	Communication Pedestal	38.94648	-121.10379	Elders Corner
6	Communication Pedestal	38.94677	-121.10390	Elders Corner
7	Communication Vault	38.94678	-121.10387	Elders Corner
8	Communication Vault	38.93924	-121.09268	North Auburn
9	Communication Vault	38.93895	-121.09259	North Auburn
10	Wood Pole	38.83949	-121.14001	Penryn
11	Wood Pole	38.83959	-121.14048	Penryn
12	Wood Pole	38.83980	-121.14113	Penryn
13	Wood Pole	38.84001	-121.14165	Penryn
14	Wood Pole	39.29417	-120.67588	Emigrant Gap
15	Wood Pole	39.29466	-120.67555	Emigrant Gap
16	Wood Pole	39.29485	-120.67529	Emigrant Gap
17	Wood Pole	39.29414	-120.67537	Emigrant Gap
18	Wood Pole	39.29381	-120.67606	Emigrant Gap
19	Wood Pole	39.42192	-120.67206	Marsh Mill
20	Tree Connection	39.42204	-120.67181	Marsh Mill
21	Tree Connection	39.42212	-120.67212	Marsh Mill
22	Wood Pole	39.41703	-120.66918	Marsh Mill
23	Wood Pole	39.40395	-120.67045	Gaston

Location #	Structure Type	Approx. Latitude	Approx. Longitude	City
24	Wood Pole	39.40467	-120.66991	Gaston
25	Wood Pole	39.40317	-120.67086	Gaston
26	Wood Pole	39.20883	-120.80613	Alta
27	Wood Pole	39.20930	-120.80568	Alta
28	Wood Pole	39.20925	-120.80532	Alta
29	Wood Pole	39.20952	-120.80480	Alta
30	Wood Pole	39.20954	-120.80401	Alta
31	Wood Pole	39.18036	-120.85616	Monte Vista
32	Wood Pole	39.18009	-120.85646	Monte Vista
33	Wood Pole	39.17973	-120.85680	Monte Vista
34	Wood Pole	39.17943	-120.85686	Monte Vista
35	Wood Pole	39.17918	-120.85755	Monte Vista
36	Wood Pole	39.14190	-120.90749	Magra
37	Wood Pole	39.14195	-120.90715	Magra
38	Wood Pole	39.14275	-120.90734	Magra
39	Wood Pole	39.14305	-120.90660	Magra
40	Wood Pole	39.13711	-120.91998	Cape Horn
41	Wood Pole	39.13728	-120.92004	Cape Horn
42	Wood Pole	39.13794	-120.92015	Cape Horn
43	Wood Pole	39.13965	-120.92757	Cape Horn
44	Wood Pole	39.13955	-120.92645	Cape Horn
45	Wood Pole	39.10391	-120.16806	Tahoe Pines
46	Wood Pole	39.10449	-120.16770	Tahoe Pines
47	Wood Pole	39.10494	-120.16773	Tahoe Pines
48	Wood Pole	39.10485	-120.16744	Tahoe Pines
49	Wood Pole	39.10477	-120.16687	Tahoe Pines
50	Wood Pole	38.95172	-120.08548	Emerald Bay
51	Wood Pole	38.95169	-120.08532	Emerald Bay
52	Wood Pole	38.95172	-120.08504	Emerald Bay
53	Communication Vault	38.92332	-120.02242	Camp Richardson
54	Wood Pole	38.92311	-120.02197	Camp Richardson
55	Wood Pole	38.92293	-120.02197	Camp Richardson
56	Wood Pole	38.92192	-120.02212	Camp Richardson

Location #	Structure Type	Approx. Latitude	Approx. Longitude	City
57	Wood Pole	38.87554	-119.99825	Meyers
58	Wood Pole	38.87545	-119.99882	Meyers
59	Wood Pole	38.87526	-119.99896	Meyers
60	Wood Pole	38.87513	-119.99922	Meyers
61	Wood Pole	38.87535	-119.99793	Meyers
62	Wood Pole	38.77490	-120.28242	Kyburz
63	Wood Pole	38.77479	-120.28242	Kyburz
64	Wood Pole	38.77480	-120.28270	Kyburz
65	Wood Pole	38.77415	-120.28310	Kyburz
66	Wood Pole	38.77349	-120.28390	Kyburz
67	Wood Pole	38.26947	-120.93769	Buena Vista
68	Wood Pole	38.26946	-120.93844	Buena Vista
69	Wood Pole	38.26945	-120.93943	Buena Vista
70	Wood Pole	38.26998	-120.93769	Buena Vista
71	Wood Pole	38.26942	-120.93687	Buena Vista
72	Wood Pole	38.36966	-120.62934	Pine Grove
73	Wood Pole	38.37035	-120.62995	Pine Grove
74	Wood Pole	38.37057	-120.63017	Pine Grove
75	Wood Pole	38.37057	-120.63017	Pine Grove
76	Wood Pole	38.37189	-120.63094	Pine Grove
77	Wood Pole	38.39478	-120.80159	Sutter Creek
78	Wood Pole	38.39438	-120.80151	Sutter Creek
79	Wood Pole	38.39441	-120.80192	Sutter Creek
80	Wood Pole	38.39432	-120.80238	Sutter Creek
81	Wood Pole	38.39427	-120.80269	Sutter Creek
82	Wood Pole	38.42152	-120.81435	Amador City
83	Wood Pole	38.42186	-120.81436	Amador City
84	Communication Pedestal	38.61608	-120.70773	Melsons Corner
85	Wood Pole	38.61613	-120.70787	Melsons Corner
86	Wood Pole	38.61610	-120.70864	Melsons Corner
87	Communication Pedestal	38.61626	-120.70882	Melsons Corner
88	Communication Pedestal	38.61612	-120.70919	Melsons Corner

Location #	Structure Type	Approx. Latitude	Approx. Longitude	City
89	Wood Pole	38.61627	-120.70953	Melsons Corner
90	Wood Pole	38.61625	-120.71015	Melsons Corner
91	Wood Pole	38.68568	-120.64681	Pleasant Valley
92	Wood Pole	38.68563	-120.64701	Pleasant Valley
93	Wood Pole	38.68563	-120.64757	Pleasant Valley
94	Wood Pole	38.75058	-120.61006	Pollock Pines
95	Wood Pole	38.75045	-120.61063	Pollock Pines
96	Wood Pole	38.75032	-120.61080	Pollock Pines
97	Wood Pole	38.75034	-120.61082	Pollock Pines
98	Wood Pole	38.75025	-120.61113	Pollock Pines
99	Wood Pole	38.75000	-120.61153	Pollock Pines
100	Wood Pole	38.73862	-120.67070	Camino
101	Wood Pole	38.73899	-120.67061	Camino
102	Wood Pole	38.73946	-120.67062	Camino
103	Wood Pole	38.72663	-120.79018	Placerville
104	Wood Pole	38.72710	-120.79000	Placerville
105	Wood Pole	38.72590	-120.79011	Placerville
106	Wood Pole	38.72590	-120.79069	Placerville
107	Wood Pole	38.72585	-120.79021	Placerville
108	Wood Pole	38.68276	-120.81449	Diamond Springs
109	Wood Pole	38.68276	-120.81365	Diamond Springs
110	Wood Pole	38.68348	-120.81428	Diamond Springs
111	Wood Pole	38.68209	-120.81473	Diamond Springs
112	Wood Pole	38.64643	-120.98575	Shingle Springs
113	Wood Pole	38.64594	-120.98477	Shingle Springs
114	Wood Pole	38.64521	-120.98457	Shingle Springs
115	Wood Pole	38.64447	-120.98534	Shingle Springs
116	Wood Pole	38.64511	-120.98546	Shingle Springs

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **GO 95, Rule 12.2 Maintenance of Lines** states in part:

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

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

Table 7: GO 95, Rule 12.2 Finding

Location #	Finding
29	Broken lashing below supply lines

2. **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 8.

Table 8: GO 95, Rule 31.1 Findings

Location #	Findings
22	Facilities require transfer to new pole
31	Facilities require transfer to new pole
37	Down guy anchor head below grade
47	Facilities require transfer to new pole
54	Facilities require transfer to new pole
71	Down guy anchor head below grade
75	Facilities require transfer to new pole
76	Facilities require transfer to new pole
78	Facilities require transfer to new pole
89	Facilities require transfer to new pole (AT&T has an existing work order to complete this work)
90	Facilities require transfer to new pole (AT&T has an existing work order to complete this work)
102	Missing junction box cover
108	Open terminal enclosure (AT&T has an existing work order to complete this work)

3. **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 9.

Table 9: GO 95, Rule 31.6 Findings

Location #	Findings
19	Abandoned line
48	Abandoned line

4. **GO 95, Rule 37, Table 1, Case 3** requires the following:

   The clearance of conductors crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts … is a minimum of 18 feet. Footnote (l) may be reduced within 12 feet of curb line of public thoroughfares .

ESRB's findings related to the above rule are listed in Table 10.

Table 10: GO 95, Rule 37, Table 1, Case 3 Findings

Location #	Finding
65	Low clearance over center of road, 13 feet
72	Low clearance over center of road, 15 feet
102	Low clearance over edge of road, 13 feet.

5. **GO 95, Rule 37, Table 1, Case 5** requires the following:

   The vertical clearance for communication conductors above ground in areas accessible to pedestrians only … is a minimum of 8 feet.

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

Table 11: GO 95, Rule 37, Table 1, Case 5 Findings

Location #	Findings
23	Line down on ground
24	Line down on ground
25	Line down on ground
39	Line down on ground

6. **GO 95, Rule 37, Table 1, Case 6** requires the following:

   Vertical clearance above walkable surfaces on buildings, (except generating plants or substations) bridges or other structures which do not ordinarily support conductors, whether attached or unattached … is a minimum of 8 feet.

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

Table 12: GO 95, Rule 37, Table 1, Case 6 Finding

Location #	Finding
99	Line down contacting roof.

7. **GO 95, Rule 38, Table 2, Case 8** requires the following:

   The minimum *vertical between conductors and/or cables, on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole and in adjoining midspans for Communication Conductors and Service Drops is 12 inches.*

ESRB's finding related to the above rule is listed in Table 13.

Table 13: GO 95, Rule 38, Table 2, Case 8 Finding

Location #	Finding
65	Communication conductors bundled with rope to other communication conductors.

8. **GO 95, Rule 38, Table 2, Case 19-C** requires the following:

The minimum radial separation between guys and span wires passing conductors supported on the same poles is 3 inches.

ESRB's findings related to the above rule are listed in Table 14.

Table 14: GO 95, Rule 38, Table 2, Case 19-C Findings

Location #	Findings
75	Service drop is wrapped around the down guy.
112	Communication line is contacting down guy.

9. **GO 95, Rule 44.3, Safety Factors, Replacement** states:

"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."

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

Table 15: GO 95, Rule 44.3 Findings

Location #	Findings
41	Horizontal crack at base
68	Cracked pole
90	Broken pole at base

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

"Wood poles shall be of sound timber.."

ESRB's findings related to the above rule are listed in Table 16:

Table 16: GO 95, Rule 49.1-A(1) Findings

Location #	Findings
18	Pole top is split, loose hardware.
69	Excessive woodpecker holes.

11. GO 95, Rule 56.6 D, Guys Exposed to 22,500 Volts or More states:

"Guys exposed to conductors of 22,500 volts or more shall not be sectionalized and shall be securely grounded (by means of ground wires, anchor guys, or attachments to securely grounded metal poles or structures)."

ESRB's finding related to the above rule is listed in Table 17:

Table 17: GO 95, Rule 56.6 D Finding

Location #	Finding
24	Down guy exposed to transmission conductor is sectionalized with an insulator bob.

12. GO 95, Rule 81.6, Stepping (See Rule 91.3-[C]**)** states:

"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…"

ESRB's finding related to the above rule is listed in Table 18:

Table 18: GO 95, Rule 81.6 Finding

Location #	Finding
95	Low pole step

13. 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."*

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

Table 19: GO 95, Rule 84.6-B Findings

Location #	Findings
19	Exposed ground conductor.
23	Exposed ground conductor.
47	Exposed ground conductor.
51	Exposed ground conductor.
54	Exposed ground conductor.
70	Exposed ground conductor.
76	Exposed ground conductor.

14. 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 20.

Table 20: GO 95, Rule 84.6-D Findings

Location #	Findings
23	Loose vertical cables, >24" between supports
39	Loose vertical cables, >24" between supports
40	Loose vertical cables, >24" between supports
74	Loose vertical cables, >24" between supports
80	Loose vertical cables, >24" between supports
86	Loose vertical cables, >24" between supports

15. 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 21:

Table 21: GO 95, Rule 86.2 Findings

Location #	Findings
14	Slack down guy (Existing AT&T work order to complete this work)
36	Slack down guy
38	Slack down guy
95	Slack down guy
112	Slack 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 findings related to the above rule are listed in Table 22:

Table 22: GO 95, Rule 86.9 Findings

Location #	Findings
16	Missing down guy marker
18	Damaged down guy marker
47	Missing down guy marker
71	Missing down guy marker
116	Missing down guy marker

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 23:

Table 23: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
16	Unsecured riser cover.
17	Riser cover lifted from pole.
23	Riser cover lifted from pole.
30	Unsecured riser cover.
40	Riser cover lifted from pole (AT&T has an existing work order to complete this work)
48	Missing/damaged riser cover.
54	Missing/damaged riser cover.
58	Missing/damaged riser cover.
60	Riser cover less than 6 feet.
106	Riser cover lifted from pole.

18. **GO 95, Rule 92.1-B, Conductors, Cables and Messengers, Between Cables and Messengers and Other Conductors** states in part:

"Where any cable or messenger (supply or communication) is less than 15 inches from center line of pole or is attached directly to the surface of jointly used poles, the following minimum vertical clearances shall apply between such cable and other conductors or cables…

Unguarded grounded cables or messengers below:
All unprotected supply conductors (a) 6 feet
All grounded cables (b) 4 feet
Guarded cables or messengers below:
Unprotected supply conductors of more than 750 volts (c) 6 feet
Unprotected supply conductors of 0 - 750 volts"

ESRB's finding related to the above rule is listed in Table 24:

Table 24: GO 95, Rule 92.1-B Finding

Location #	Finding
50	Less than 6 ft clearance between communication line and supply conductor with a guard. Note: AT&T work order identified the non-conformance, but the work order was marked closed. The work had not been completed. See also Record Finding 5b.

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 25:

Table 25: GO 128, Rule 17.1 Findings

Location #	Findings
5	Unsecured enclosure (Fixed in field)
87	Enclosure could not be opened.

20. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

"Manholes, handholes, subsurface and self-contained surface mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.."

ESRB's findings related to the above rule are listed in Table 26:

Table 26: GO 128, Rule 17.8 Findings

Location #	Findings
2	Missing ownership mark (Fixed in Field)
4	Missing ownership mark (Fixed in Field)
53	Missing ownership mark
87	Missing ownership mark (Fixed in Field)
88	Missing ownership mark (Fixed in Field)

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 27:

Table 27: GO 95, Rule 18-A Observations

Location #	Findings
45	Low service drop.
45	Low clearance between power and communications. (Liberty Utilities)
56	Uncovered riser.
58	Uncovered riser.
60	Uncovered riser.
64	Exposed ground wire. (Pacific Gas and Electric)
65	Broken lashing wire.
65	Rope used as attachment.

Location #	Findings
78	Low span. About 7 feet.
80	Cable line abandoned.
81	Third party lines touching AT&T line and supply power.
94	Cable riser not covered.
95	Broken lashing.
98	Abandoned asset.
107	Uncovered riser.
109	Cable clearance from power on pole. (Comcast)