STATE OF CALIFORNIA GAVIN C. NEWSOM., *Governor*

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

May 20, 2025 CA2025-1251

Ross Johnson
Area Manager Regulatory Relations
AT&T Inc.
430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communications Infrastructure Provider (CIP) Audit of AT&T San Joaquin, Stanislaus, and Calaveras Counties

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Monica Hoskins and Nora Nguyen of ESRB staff conducted a CIP audit of AT&T San Joaquin, Stanislaus, and Calaveras Counties from March 24 through March 28, 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 General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than June 20, 2025, via 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 and observations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like 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 Monica Hoskins at monica.hoskins@cpuc.ca.gov or (415) 652-1847.

Sincerely,

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

Enclosure: CPUC Audit Findings of AT&T San Joaquin-Stanislaus-Calaveras Counties

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
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Yi Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Monica Hoskins, Utilities Engineer, ESRB, SED, CPUC
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Josh Alvarado, Lead Regulatory Relations, External & Legislative Affairs, AT&T

AT&T SAN JOAQUIN, STANISLAUS, AND CALAVERAS COUNTIES
COMMUNICATIONS AUDIT FINDINGS
March 24 – 28, 2025

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for AT&T's San Joaquin, Stanislaus, and Calaveras Counties:

- AT&T Overhead Lines Maintenance Plan Version 5.5, GO 95 Rule 18, August 30, 2024
- AT&T Visual Inspections of Overhead Lines, GO 95 Rule 80.1A, November 15, 2024
- Facility Statistics of San Joaquin, Stanislaus and Calaveras Counties, as of March 2025
- San Joaquin, Stanislaus and Calaveras Audit Area Map
- A list of GO 95 patrols and detailed inspections conducted from January 2020 to January 2025, and the inspection data from DA-2201, DA-112340, DA-R2107, DA-611101, and DA-4203
- A list of overhead and underground open, completed, and cancelled work orders from January 2020 to January 2025
- Current inspector training programs, employee statistics, and employee training
- Records for intrusive pole inspections conducted from January 2024 to January 2025
- Records for all outgoing Safety Hazard notifications, from January 2020 to January 2025
- Records for all incoming Safety Hazard notifications, from January 2020 to January 2025
- A list of all pole safety factor calculations completed from January 2020 to January 2025
- A list of all new construction projects completed from January 2024 to January 2025

II. Records Violations

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

1. **General Order (GO) 128, Rule 17.2, Inspection** states in part:

> *"Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules."*

AT&T provided no procedure to ESRB detailing how underground assets are inspected thoroughly and completely as required by GO 128, Rule 17.2. AT&T states that it inspects its underground facilities and that its procedures and practices are consistent across the telecommunications industry, as well as the requirements of California General Orders. However, AT&T provided no procedure to support their practices and ensure they are in compliance with GO 128.

2. **GO 95, Rule 18-B, 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. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.*
>
> *The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities."*
>
> *(1) "Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.*
>
> *a. 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, GO 95 Rule 18*, published August 30, 2024, defines the priority codes and associated time frames for the response/repair action of overhead facilities as follows:

Level 1	Nonconformances pose an immediate risk of high potential impact to safety or reliability. **Within 72 hours**, Level 1 nonconformances shall be corrected or temporarily remediated and reclassified to a lower priority.
Level 2	Nonconformances pose any other risk of at least moderate potential impact to safety or reliability. Corrective action for Level 2 nonconformances shall be based on individual circumstances and exceptions noted below, but **not to exceed 36 months.**
Level 2a	Nonconformances are Level 2 nonconformances that may compromise worker safety. Level 2a nonconformances must be corrected or temporarily remediated and reclassified to a lower priority in **no more than 12 months.**
Level 2b	Nonconformances are Level 2 nonconformances that may create a fire risk. Level 2b nonconformances must be corrected or temporarily remediated and reclassified to a lower priority in **no more than 12 months if in Fire Map Tier 2 or no more than 6 months if in Fire Map Tier 3, or 36 months in Fire Map Tier 1.**
Level 2c	Nonconformances are Level 2 nonconformances that may create a fire risk and may affect worker safety. Level 2c nonconformances must be corrected or temporarily remediated and reclassified to a lower priority in **no more than 12 months in Tier 1 and 2 of the High-Fire Threat District and 6 months for Tier 3 of the High-Fire Threat District.**
Level 3	Nonconformances pose a risk of low potential impact to safety or reliability. Level 3 nonconformances must be corrected within **60 months.**

ESRB's review of AT&T's work orders from January 2020 through January 2025 found that AT&T had 427 out of 3,605 (11.8%) pending overhead work orders that were overdue and 425 out of 1609 (26.4%) closed overhead work orders that were completed late. AT&T also had 180 out of 1,403 (12.8%) overhead work orders that were cancelled late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-closed work orders are work orders that were completed past their assigned due date based on

their hazard level. Table 1 below breaks down the 1,032 late overhead work orders by hazard level.

Table 1: Overhead Late Work Orders

Hazard Level	Late-Pending Work Orders*	Late-Closed Work Orders	Late-Cancelled Work Orders	Total Late Work Orders
1	0	6	2	8
2	311	56	133	500
2a	36	3	6	45
2b	61	360	32	453
2c	19	0	7	26
3	0	0	0	0
Total	427	425	180	**1,032**

*As of January 1, 2025

AT&T must provide ESRB with its corrective action plan to complete the 427 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 identifies the most overdue overhead non-exempt work orders for each hazard level.

Table 2: Most Overdue Overhead Work Orders

Hazard Level	Most Overdue Work Orders (Package ID)	Number of Days Past Assigned Due Date
1	n/a	n/a
2	569603	688
2a	1022980	775
2b	1022435	957
2c	1022876	956
3	n/a	n/a

AT&T identified work order #569603 on February 13, 2020, to transfer facilities to a new pole with a required end date of February 13, 2023. AT&T has not yet completed the work.

AT&T identified work order #1022980 on November 18, 2021, to place a guard arm to address clearance to power cables with a required end date of November 18, 2022. AT&T has not yet completed the work.

AT&T identified work order #1022435 on November 20, 2021, to install a down guy with a required end date of May 20, 2022. AT&T has not yet completed the work.

AT&T identified work order #1022876 on November 21, 2021, to evaluate a deteriorated pole with a required end date of May 21, 2022. AT&T has not yet completed the work.

3. **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.*
>
> *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 work orders from January 2020 through January 2025 found that AT&T had 22 out of 179 (12.3%) closed underground work orders that were completed late. Late-closed work orders are work orders that were completed past their assigned due date. AT&T had no pending underground work orders that were overdue.

4. **GO 95, Rule 80.1A(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District** states in part:

> *"In Tiers 2 and 3 of the High Fire-Threat District, inspection intervals for (i) Communication Lines located on Joint Use Poles (see Rule 21.8) that contain Supply Circuits (see Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, 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

ESRB reviewed AT&T's San Joaquin, Stanislaus, and Calaveras County Region patrol and detailed inspection records from January 2020 to January 2025 for the interval between inspections and the period since the last inspection. ESRB found a total of 181 out of 726 (24.9%) patrols and inspections that were late or are past due. Table 3 shows the distribution areas ("DA") within the audit area with the most overdue inspections in the past 5 years based on the cycles defined by Rule 80.1A(1).

Table 3: Most Overdue Inspections

UN_DA_NA	CLLI_ID	Fire Tier	Initial Patrol or Detailed Inspection	Following Patrol or Detailed Inspection	Days Late
NAI641101	ARNLCA11	3	9/10/2020	12/16/2021	97
NAI2601	ARNLCA11	3	9/15/2020	12/17/2021	93
NAI420301	ARNLCA11	3	9/10/2020	12/12/2021	93
NAI641201	ARNLCA11	3	9/9/2020	12/9/2021	81

III. Records Observations

1. 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)."*

ESRB's analysis of AT&T's Work Order History identified missing personnel who performed the inspections in the "FORCE_TECH" and "FLD_FORCE_TECH" fields for the overhead completed work orders, the underground open work orders, and the underground completed work orders. GO 95 requires utilities to maintain records for 10 years, and AT&T has incomplete and missing information regarding the personnel who performed each inspection and the personnel who performed each corrective action in the Work Order History provided to ESRB.

IV. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Structure Type	Asset Number	Address	City	GPS Coordinates
1	Underground Handhold	n/a	9626 Bancroft Way	Stockton	38.038324, -121.363771
2	Underground Handhold	n/a	9645 Bancroft Way	Stockton	38.038707, -121.363749
3	Underground Vault	n/a	9658 Bancroft Way	Stockton	38.039017, -121.363706
4	Underground Vault	n/a	3813 Gregory Way	Stockton	38.039036, -121.364107
5	Underground Handhold	n/a	3819 Gregory Way	Stockton	38.03907, -121.364484
6	Underground Handhold	n/a	9640 North Ridge Way	Stockton	38.038615, -121.365241
7	Pole	122002072	416 Smith Lane	Stockton	37.975394, -121.304099
8	Pole		424 Smith Lane	Stockton	37.97538, -121.304225
9	Pole		454 Smith Lane	Stockton	37.97525, -121.304824
10	Pole	122002074	Across from 454 Smith Lane	Stockton	37.975183, -121.304796
11	Pole	122002075	Corner of Smith Lane and Allston Way	Stockton	37.975122, -121.305272
12	Pole		Along Pock Lane	Stockton	37.92458, -121.242983
13	Pole	3310	Along Pock Lane	Stockton	37.924884, -121.243156
14	Pole		Along Pock Lane	Stockton	37.92512, -121.24324
15	Pole	3124	3124 Pock Lane	Stockton	37.925716, -121.243479
16	Pole		8511 Center Street	Mokelumne Hill	38.302106, -120.708976
17	Pole		8511 Center Street	Mokelumne Hill	38.302139, -120.708847
18	Pole	121789624	Along Center Street	Mokelumne Hill	38.302193, -120.708583
19	Pole		8448 Center Street	Mokelumne Hill	38.302332, -120.707867
20	Pole	122244963	Intersection of Peek Circle and Center Street	Mokelumne Hill	38.302213, -120.707119
21	Pole	121439498	2760 Golden Gate Drive	San Andreas	38.233187, -120.713212
22	Pole	121356200	Along Golden Gate Drive	San Andreas	38.232968, -120.712981
23	Pole	120165306	Along Golden Gate Drive	San Andreas	38.232224, -120.712636
24	Pole		Corner of Golden Gate Drive and Spring Hill Road	San Andreas	38.233575, -120.713533
25	Pole		Along Spring Hill Road	San Andreas	38.233965, -120.71323
26	Pole	121258359	2921 Spring Hill Road	San Andreas	38.234414, -120.712404
27	Pole	120333045	Carol Lane	Valley Springs	38.163428, -120.886102
28	Pole		Shangri La Valley	Valley Springs	38.163617, -120.885384
29	Pole	121600970	9723 Camanche Parkway South	Valley Springs	38.206493, -120.95145

30	Pole	120520830	9795 Camanche Parkway South	Valley Springs	38.206542, -120.950377
31	Pole	120520831		Valley Springs	38.206411, -120.949424
32	Pole	121806280	Along Camanche Parkway South	Valley Springs	38.206081, -120.948578
33	Pole	121806321	9901 Camanche Parkway South	Valley Springs	38.205584, -120.947766
34	Pole		1200 West Vine Street	Lodi	38.122601, -121.288127
35	Pole		Corner of South Ham Lane and West Vine Street	Lodi	38.122936, -121.288136
36	Pole		1235 West Vine Street	Lodi	38.123278, -121.288118
37	Pole		800 South Ham Lane	Lodi	38.123704, -121.288111
38	Pole		800 South Ham Lane	Lodi	38.123846, -121.288152
39	Pole		821 South Ham Lane	Lodi	38.123885, -121.288354
40	Underground Handhold	n/a	233 Donner Drive	Lodi	38.143757, -121.267515
41	Underground Vault	n/a	303 Donner Drive	Lodi	38.143775, -121.267144
42	Underground Handhold	n/a	315 Donner Drive	Lodi	38.143795, -121.26673
43	Underground Pedestal	n/a	327 Donner Drive	Lodi	38.143781, -121.266367
44	Underground Handhold	n/a	335 Donner Drive	Lodi	38.143853, -121.265931
45	Underground Vault	n/a	308 Columbia Drive	Lodi	38.144425, -121.266373
46	Underground Vault	n/a	244 Columbia Drive	Lodi	38.144427, -121.266745
47	Underground Handhold	n/a	232 Columbia Drive	Lodi	38.144388, -121.267066
48	Underground Pedestal	n/a	220 Columbia Drive	Lodi	38.14441, -121.26746
49	Pole		Corner of Locke Road and North Tretheway Road	Lockeford	38.145611, -121.178288
50	Pole	121306138	Along North Tretheway Road	Lockeford	38.145859, -121.178465
51	Pole	2-38 T40811836	17971 North Tretheway Road	Lockeford	38.146426, -121.178458
52	Pole		17985 Brandt Road	Lodi	38.146649, -121.178716
53	Pole		2882 Kenshaw Way	Arnold	38.2957, -120.268948
54	Pole	120794894	550 Wikami Way	Arnold	38.294999, -120.26906
55	Pole		562 Wikami Way	Arnold	38.294832, -120.268426
56	Pole	120795004	597 Wikami Way	Arnold	38.295205, -120.269635
57	Pole	121084605	453 Wikami Way	Arnold	38.295318, -120.270631
58	Pole	120855730	452 Wikami Way	Arnold	38.295263, -120.2711

59	Pole	120782321	Intersection of Hang Tree Trail and Muriettas Roost	Arnold	38.295172, -120.271925
60	Pole	121082601	1918 Patricia Lane	Arnold	38.245637, -120.345638
61	Pole	121082600	Intersection of Patricia Lane and Colleen Court	Arnold	38.245291, -120.346087
62	Pole	121082596	Along Colleen Court	Arnold	38.244689, -120.345926
63	Pole	121082597	1997 Colleen Court	Arnold	38.244377, -120.345566
64	Pole	121082603	1960 Colleen Court	Arnold	38.244958, -120.346526
65	Pole	121115861	1887 Colleen Court	Arnold	38.245202, -120.344849
66	Pole	121092668	376 Cresta Vista Drive	Hathaway Pines	38.18612, -120.370955
67	Pole	121092667	376 Cresta Vista Drive	Hathaway Pines	38.185964, -120.371629
68	Pole		428 Cresta Vista Drive	Hathaway Pines	38.185915, -120.372218
69	Pole	121116084	322 Horseshoe Drive	Hathaway Pines	38.185939, -120.370754
70	Pole	121116085	289 Horseshoe Drive	Hathaway Pines	38.185591, -120.370185
71	Pole	165	1138 CA-4	Douglas Flat	38.119528, -120.451908
72	Pole	166	Along CA-4	Douglas Flat	38.119998, -120.451584
73	Pole	121120123	1053 CA-4	Douglas Flat	38.120533, -120.451378
74	Pole	110365652	Along Main Street	Douglas Flat	38.120212, -120.451802
75	Pole	121120132	1040 Main Street	Douglas Flat	38.119623, -120.452523
76	Pole		948 Purdy Road	Angels Camp	38.075067, -120.541814
77	Pole	121116634	Corner of Purdy Road and South Baker Road	Angels Camp	38.075311, -120.542142
78	Pole	120118173	827 Purdy Road	Angels Camp	38.075815, -120.542518
79	Pole	120858471	835 Purdy Road	Angels Camp	38.075996, -120.542637
80	Pole	121230701	850 Purdy Road	Angels Camp	38.076248, -120.542753
81	Pole	120944408	12789 Orange Blossom Road	Oakdale	37.789165, -120.761868
82	Pole	120944409	12784 Orange Blossom Road	Oakdale	37.788866, -120.761487
83	Pole	120944493	12784 Orange Blossom Road	Oakdale	37.788593, -120.761661
84	Pole	9831	9817 Stephens Street	Delhi	37.431548, -120.778031
85	Pole		Corner of Locust Street and Stephens Street	Delhi	37.431197, -120.77756
86	Pole	9975	9767 Stephens Street	Delhi	37.430662, -120.776968
87	Pole		Corner of Acacia Street and Stephens Street	Delhi	37.430678, -120.777075
88	Pole	15979	9761 Stephens Street	Delhi	37.430462, -120.77739
89	Pole	16005	16067 Acacia Street	Delhi	37.430145, -120.777815
90	Pole	41	16092 Acacia Street	Delhi	37.42981, -120.778334
91	Pole	9785	9799 Stephens Street	Delhi	37.430963, -120.777281
92	Pole	1345	1331 Dianne Drive	Turlock	37.505807, -120.880933
93	Pole	131	1331 Dianne Drive	Turlock	37.505753, -120.880933
94	Pole		1331 Dianne Drive	Turlock	37.505365, -120.880931
95	Pole		Along Dianne Drive	Turlock	37.504879, -120.880918
96	Pole		Along Dianne Drive	Turlock	37.504643, -120.880924
97	Pole		1224 Dianne Drive	Turlock	37.504677, -120.880812
98	Pole	6	1130 Dianne Drive	Turlock	37.503988, -120.880807

99	Pole		1025 Dianne Drive	Turlock	37.503287, -120.880819
100	Pole	5002	4954 Geer Road	Hughson	37.565646, -120.846934
101	Pole		Along Geer Road	Hughson	37.56507, -120.846943
102	Underground Pedestal	n/a	4954 Geer Road	Hughson	37.565658, -120.846943
103	Pole	17E/Y1/5	12316 Bentley Street	Waterford	37.638764, -120.7644
104	Pole	17E/Y1/14	12317 Bentley Street	Waterford	37.638935, -120.76462
105	Pole	17E3/Y1/11	112 I Street	Waterford	37.639271, -120.764896
106	Pole	17E3/X1/29	12212 Main Street	Waterford	37.639614, -120.765217
107	Pole	17E/X1/11	Corner of I Street and Main Street	Waterford	37.639821, -120.76541
108	Pole	17E3/Y2/13	12449 Yosemite Boulevard	Waterford	37.63839, -120.764021
109	Pole	17E3/Y2/14	12308 Bentley Street	Waterford	37.638298, -120.764213
110	Pole		3530 Service Road	Ceres	37.58024, -120.930781
111	Pole		3524 Service Road	Ceres	37.580195, -120.931291
112	Pole	6450	3460 Service Road	Ceres	37.580221, -120.931843
113	Pole	3456	3421 Service Road	Ceres	37.580221, -120.932406
114	Pole		3961 Esmar Road	Ceres	37.580229, -120.930195
115	Underground Vault	n/a	1125 Rose Lawn Avenue	Modesto	37.614459, -121.006143
116	Underground Vault	n/a	1109 Rose Lawn Avenue	Modesto	37.614892, -121.005792
117	Underground Vault	n/a	1105 Rose Lawn Avenue	Modesto	37.615165, -121.005523
118	Underground Vault	n/a	1017 Rose Lawn Avenue	Modesto	37.616265, -121.004871
119	Underground Vault	n/a	1001 Rose Lawn Avenue	Modesto	37.647101, -120.972163
120	Pole	10E4/Y1/9	536 Covena Avenue	Modesto	37.646609, -120.972125
121	Pole	10E5/X1/3	526 Covena Avenue	Modesto	37.646149, -120.972093
122	Pole	10E5/X1/8	520 Covena Avenue	Modesto	37.645629, -120.972046
123	Pole	10E5/X1/9	508 Covena Avenue	Modesto	37.645477, -120.972043
124	Pole	10E5/X1/14	Corner of Covena Avenue and Encina Avenue	Modesto	37.645348, -120.972049
125	Pole	10E5/X1/15	Corner of Covena Avenue and Encina Avenue	Modesto	37.64536, -120.97161
126	Pole	10E5/X2/5	1520 Encina Avenue	Modesto	37.645053, -120.971555
127	Pole	10E5/X2/8	432 Covena Avenue	Modesto	37.732573, -120.91741
128	Pole	121103817	Corner of Patterson Road and Central Avenue	Oakdale	37.732575, -120.91685
129	Pole	110476314	Along Patterson Road	Oakdale	37.73256, -120.91609
130	Pole	121103816	4412 Patterson Road	Oakdale	37.732545, -120.915345
131	Pole	121103815	4424 Patterson Road	Oakdale	37.758892, -121.425219
132	Pole	53399	3068 Holly Drive	Tracy	37.75886, -121.425744
133	Pole	121600828	3082 Holly Drive	Tracy	37.758835, -121.425918

134	Pole	121600830	3068A Holly Drive	Tracy	37.758588, -121.425914
135	Pole	120991474	3038 Holly Drive	Tracy	37.758687, -121.426056
136	Pole	120991477	3041 Holly Drive	Tracy	37.759076, -121.426055
137	Pole	120891481	3089 Holly Drive	Tracy	37.759244, -121.426045
138	Pole	120991482	3117 Holly Drive	Tracy	37.759408, -121.426096
139	Pole	120991483	3141 Holly Drive	Tracy	37.714621, -121.423072
140	Underground Pedestal	n/a	230 De Bord Drive	Tracy	37.714567, -121.423839
141	Underground Pedestal	n/a	190 De Bord Drive	Tracy	37.714797, -121.424978
142	Underground Pedestal	n/a	131 Cairo Court	Tracy	37.715359, -121.424839
143	Underground Pedestal	n/a	2157 De Bord Drive	Tracy	37.715729, -121.424094
144	Underground Pedestal	n/a	183 Fairmount Lane	Tracy	37.715749, -121.423694
145	Underground Pedestal	n/a	203 Fairmount Lane	Tracy	37.715737, -121.422914
146	Underground Pedestal	n/a	243 Fairmount Lane	Tracy	37.715727, -121.422131
147	Underground Pedestal	n/a	283 Fairmount Lane	Tracy	37.715075, -121.421991
148	Underground Pedestal	n/a	2170 Bettencourt Way	Tracy	37.714601, -121.4223
149	Underground Pedestal	n/a	270 De Bord Drive	Tracy	37.764182, -121.553104
150	Underground Vault	n/a	1118 Vecindad Street	Tracy	37.764911, -121.552095
151	Underground Vault	n/a	311 Wyatt Drive	Tracy	37.765106, -121.552624
152	Underground Vault	n/a	1057 Fulton Street	Tracy	37.765703, -121.552568
153	Underground Vault	n/a	1007 Fulton Street	Tracy	37.76616, -121.552432
154	Underground Vault	n/a	987 Fulton Street	Tracy	37.767056, -121.552134
155	Underground Vault	n/a	931 Fulton Street	Tracy	37.766886, -121.553815
156	Underground Vault	n/a	478 W Royce Drive	Tracy	37.766877, -121.554294
157	Underground Vault	n/a	522 W Royce Drive	Tracy	37.76739, -121.554207
158	Underground Vault	n/a	937 S Morgan Lane	Tracy	38.038324, -121.363771

V. 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."*

ESRB's findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 31.1 Findings

Location	Findings
18	The terminal splice box has loose wires hanging out and needs to be resealed.
23	The pole has a missing lashing wire between Location 22 and Location 23.
49	The pole is damaged and needs replacement.
50	The terminal splice box has loose wires hanging out and needs to be resealed.
52	The remaining buddy pole needs to be removed.
55	The pole has an incomplete facilities transfer.
58	The pole has an incomplete facilities transfer and the remaining buddy pole needs to be removed.
68	The pole has a loose lashing wire.
75	The pole has a loose drop that needs to be tightened. AT&T has existing Ticket #100757144 to replace the terminal splice box, and the loose drop will be resolved with the replacement.
86	The pole has a loose lashing wire between Location 85 and Location 86.
95	The pole has a loose lashing wire between Location 94 and Location 95.
98	The pole has a loose lashing wire. The animal guard is loose and hanging down between Location 98 and Location 99.
105	The terminal splice box has loose wires hanging out and needs to be resealed.
112	The pole has a loose lashing wire between Location 111 and Location 112.

Location	Findings
112	The terminal splice box has loose wires hanging out and needs to be resealed.
128	The animal guard is loose and hanging down.
132	The pole has an incomplete facilities transfer.
139	The repeater case is unattached to the pole and hanging low and accessible to the public.

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 5:

Table 5: GO 95, Rule 31.6 Findings

Location	Findings
8	The pole has two abandoned drops that need removal.
64	The pole has an abandoned drop that needs removal.
69	The pole has an abandoned drop that needs removal.
82	The pole has abandoned drops that need removal.
84	The pole has abandoned drops and communication lines that need removal. AT&T fixed this issue in the field.
86	The pole has an abandoned drop that needs removal.
90	The pole has two abandoned drops that need removal.
100	The pole has an abandoned drop that needs removal.
103	The pole has an abandoned drop that needs removal.
105	The pole has an abandoned drop that needs removal between Location 104 and Location 105.
132	The pole has an abandoned drop that needs removal.

3. **GO 95, Rule 35, Vegetation Management s**tates 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 findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 35 Findings

Location	Findings
55	Vegetation is causing strain on the communication lines.
57	Vegetation is causing strain and abrasion on the communication lines between Locations 56 and Location 57.
75	Vegetation is causing strain and abrasion on the communication lines between Locations 74 and Location 75. AT&T has existing Ticket #100469858 for this issue.
80	Vegetation is causing strain on the communication drop.

4. **GO 95, Rule 38, Minimum Clearance of Wires from Other Wires** states in part:

> *"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at s of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive."*
>
> *Table 2, Case 8C: Vertical separation 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 (including open wire, cables and service drops) must be at least 12 inches.

EXCEPTION: Can be less than 12" for strand mounted terminals, splice cases and other equipment located 8" or more from the centerline of the pole, but not less than 1" with mutual agreement between affected owners."

Table 2, Case 16C: The radial separation between communication conductors (including open wire, cables, and service drops) and conductors, taps or lead wires of different circuits on same crossarm, pole or structure must be at least three inches.

Table 2, Case 18C: The radial separation between guys and span wires passing communication conductors (including open wire, cables, and service drops) supported on the same poles must be at least 3 inches.

ESRB's findings related to the above rule are listed in Table 7:

Table 7: GO 95, Rule 38 Findings

Location	Findings
14	The conductors are in contact with cable facilities between Location 14 and Location 15.
19	The drop is in contact with other utility facilities.
104	The drop is in contact with other utility facilities.
127	The communication conductor is in contact with the power, cable, and AT&T down guy wires above the insulators.
128	The communication conductor is in contact with the cable and AT&T down guy wires.
133	The terminal splice box and associated lines are in contact with other utility facilities.

5. **GO 95, Rule 84.6-B, Ground Wires** states:

"Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.

Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8).”

ESRB’s findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 84.6-B Findings

Location	Findings
77	The vertical ground wire is exposed, and the protective moulding cover is detached from the pole.
84	The vertical ground wire is exposed, and the protective moulding cover is damaged.
91	The vertical ground wire is exposed, and the protective moulding cover is missing.
108	The vertical ground wire is exposed, and the protective moulding cover is detached from the pole.

6. **GO 95, Rule 86.2, Guys, Use** states in part:

“Where mechanical loads imposed on poles, towers or structures are greater than can be supported with the safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.

Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire stress, the pole below the point of guy attachment acting merely as a strut.

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 in Table 9:

Table 9: GO 95, Rule 86.2 Findings

Location	Findings
17	The down guy is unattached and hanging loose with no anchor.
19	The anchor down guy is slack and contacting other guy wire.

Location	Findings
27	The anchor down guy is slack.
50	The anchor down guy is slack.
61	The anchor down guy is slack.
63	The anchor down guy is slack.
73	The anchor down guy is slack with a damaged anchor. AT&T has existing Ticket # 100469965 for the damaged anchor.
83	The anchor down guy is slack.

7. **GO 95, Rule 86.7-B, Location of Sectionalizing Insulators, Anchor Guys** states in part:

   "In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule 86.7–B."

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

Table 10: GO 95, Rule 86.7-B Finding

Location	Findings
126	Vegetation above the down guy insulator is contacting and grounding the anchor guy.

8. **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 11:

Table 11: GO 95, Rule 87.7-D(1) Findings

Location	Findings
29	The riser guard is missing and exposing the communication drops.
34	The riser guard is less than 8 feet.
85	The riser guard is less than 8 feet.
96	The riser guard is not securely attached to the pole and has a gap making the facilities accessible to the public.
100	The riser guard is missing and exposing the communication drops.
104	The riser guard is not securely attached to the pole.

9. **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.*

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 findings related to the above rule are listed in Table 12:

Table 12: GO 128, Rule 17.1 Findings

Location	Findings
141	The pedestal grounding wire needs to be stripped for ground-to-ground contact with the grounding rod.
144	The pedestal grounding wire needs to be stripped for ground-to-ground contact with the grounding rod.

Location	Findings
149	The pedestal enclosure is jammed and cannot be accessed.
158	The vault lid is stuck with a damaged interior box and the enclosure needs replacement.

10. **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 13:

Table 13: GO 128, Rule 17.8 Findings

Location	Findings
1	The handhold is missing an ownership marking.
2	The handhold is missing an ownership marking.
3	The vault is missing an ownership marking.
4	The vault is missing an ownership marking.
5	The handhold is missing an ownership marking.
40	The handhold is missing an ownership marking.
43	The pedestal is missing an ownership marking.
44	The handhold is missing an ownership marking.
102	The pedestal is missing an ownership marking. AT&T fixed this issue in the field.
115	The vault is missing an ownership marking.
117	The vault is missing an ownership marking.
118	The vault is missing an ownership marking.
119	The vault is missing an ownership marking.

VI. Field Inspection Observations

1. **GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities** states in part:

   "For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property..."

   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."

   During the field inspection, ESRB observed the third-party safety concerns listed in Table 14:

Table 14: Third-Party Observations

Location	Observations
8	Cable has unsecured lines in contact with other utility facilities.
9	Cable has a loose drop contacting other utility facilities.
10	Cable has a missing riser guard and a loose drop unsecured to the pole.
15	Cable has an abandoned drop and low hanging lines in contact with other utility facilities.
17	Cable has an unattached down guy wire hanging loose.
19	Cable has a loose drop contacting other utility facilities.
36	Power has an abandoned cut ground wire.

Location	Observations
38	Power has a damaged pole with loose visibility strips, a damaged ground wire, and damaged ground wire moulding.
50	Power has a slack span guy and a guy wire contacting other utility guy wires.
54	Cable has a missing riser guard.
57	Cable has loose lashing wire causing contact with other utility facilities.
58	Cable has a loose drop contacting other utility facilities and an incomplete pole transfer.
63	Cable has vegetation above the down guy insulator is contacting and grounding the anchor guy.
69	Cable has an exposed ground wire with broken ground moulding.
80	Cable has an abandoned drop.
83	Power has a slack anchor down guy, which is causing the pole to lean.
85	Power has a low pole step.
104	Cable has a low drop to 110 I Street with insufficient clearance.
105	Cable has an abandoned drop.
108	Cable has a broken lashing wire and an exposed ground wire.
125	Cable has vegetation causing strain and abrasion on their facilities.
126	Cable has vegetation above the down guy insulator is contacting and grounding the anchor guy.
127	Cable has a loose drop contacting other utility facilities.
131	Cable has an abandoned drop.
133	Cable has a low hanging drop with insufficient clearance.
136	Cable has a loose drop contacting other utility facilities.
138	Cable has a loose drop contacting secondary power lines.
139	Cable has a loose drop contacting and wrapped around other utility facilities.