STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

April 16, 2025 CA2025-1266

John Gutierrez
Senior Director – Government Affairs
Comcast
3055 Comcast Place
Livermore, CA 94551

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Comcast's Delta Valley Region

Mr. Guiterrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Stephen Lee, Matthew Yunge, and Lana Tran of ESRB staff conducted a CIP audit of Comcast's Delta Valley Region, comprising of Alameda and Contra Costa Counties, from March 10 to March 14, 2025. During the audit, ESRB staff conducted field inspections of Comcast's facilities 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 May 15, 2025, by electronic copy of all corrective actions and preventive measures taken by Comcast 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 Stephen Lee at (916) 661-2353 or Stephen.Lee@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 Comcast Delta Valley

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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
Matthew Yunge, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Jason Aguas, Manager Regulatory Affairs – California, Comcast

CPUC AUDIT FINDINGS OF COMCAST

DELTA VALLEY

MARCH 10 – 14, 2025

I. Records Review

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

- The U-Safe Program, General Order (GO) 95/128 Repair and Reporting Documentation, version March 2, 2010, with Comcast Repair Categories for Nonconformances.
- Facility statistics as of December 2024, including miles of overhead lines, miles of underground lines, number of poles, and number of underground structures.
- Overhead and Underground facility maps as of December 2024.
- Inspection and patrol records containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings and repairs from December 2019 through December 2024.
- Safety Hazards Notifications received from third-party utilities from December 2019 through December 2024.
- Safety Hazards Notifications sent to third-party utilities from December 2019 through December 2024.
- Pole loading calculations, including intrusive testing for Tier 2 and Tier 3 High Fire Threat Districts from December 2023 through December 2024.
- Employee statistics and employee training records from December 2019 through December 2024.
- Employee training materials, including the Comcast Outside Plant Handbook for Clearances and Regulations in California, contractor training PowerPoint on GO 95, and the Patrol Inspection Training Form.
- New construction projects from December 2023 through December 2024.

II. Records Violations

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

1. **General Order (GO) 95, Rule 18-B(1)(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."*

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 reviewed Comcast's work orders created between December 1, 2019 through December 1, 2024. During this time, Comcast created 516,238 work orders. ESRB found that 1,508 out of 516,238 (or 0.3%) of these 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 1 below breaks down the 1,508 late work orders by priority level.

Table 1: Late Facility Work Orders

Priority Level	Late-Pending Work Orders[1]	Late-Complete Work Orders	Total Late Work Orders	Total Work Orders Created	Percentage Late
1	13	996	1,009	1,009	100%
2	324	175	499	505,724	0.1%
3	0	0	0	9,505	0%
Total	337	1,171	1,508	516,238	0.3%

The most overdue Priority 1 work order was identified during an inspection of the pole at 4051 Happy Valley Rd in Lafayette. It was created on March 24, 2022 for a span that required heavy tree trimming and had a due date of March 25, 2022. Comcast completed the work order on December 7, 2023, 622 days late. Many of the overdue Priority 1 work orders in the table above were due to vegetation-related issues. Comcast stated that "because of the logistics involved in coordinating some Priority Level 1 tree trims, immediate repairs may take up to 90 days." Comcast's work management system currently requires Priority 1 work orders to be completed in one day. This 90-day tree trimming repair window is currently not reflected in Comcast's work management system.

The most overdue Priority 2 work order was identified during a patrol of the underground facility at 371 Camino Sobrante in Orinda. It was created on January 8, 2020 for an "HSD out" issue and had a due date of January 7, 2021. As of December 1, 2024, the work was not complete and is over 1,424 days late.

2. **GO 95, Rule 80.1-A(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, the 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* |
>
> *For the purpose of implementing the patrol and detailed inspection intervals in the above Table, 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."*

[1] As of December 1, 2024.

ESRB compared Comcast's patrol and detailed inspection records with the locations of its facilities and identified that Comcast did not inspect 85 poles in Tier 2 High Fire-Threat Districts (HFTD) between December 1, 2019 through December 1, 2024. There were no corresponding patrol or detailed inspection records for these 85 locations. The locations are listed in Table 2 below:

Table 2: Missing Inspections in Tier 2 HFTD

Facility Identification Number	Latitude	Longitude
CALCP77009417	37.70766	-122.109
CALCP77011684	37.70653	-122.115
CALCP77011727	37.70749	-122.112
CALCP77011692	37.70669	-122.114
CALCP77009439	37.70934	-122.11
CALCP77009423	37.7073	-122.107
CALCP77009360	37.70581	-122.106
CALCP77009422	37.70709	-122.107
CALCP77011730	37.70862	-122.112
CALCP77009416	37.70813	-122.109
CALCP77009437	37.70893	-122.109
CALCP77011709	37.70503	-122.108
CALCP77009409	37.7102	-122.11
CALCP77011718	37.70747	-122.111
CALCP77011742	37.70877	-122.113
CALCP77011694	37.70727	-122.115
CALCP77011683	37.70684	-122.115
CALCP77009421	37.70677	-122.108
CALCP77011703	37.70729	-122.111
CALCP77011706	37.70448	-122.108
CALCP77011685	37.7061	-122.115
CALCP77011726	37.70721	-122.113
CALCP77011679	37.70769	-122.11
CALCP77009436	37.70831	-122.11
CALCP77011674	37.70749	-122.109
CALCP77011676	37.7081	-122.109
CALCP77011672	37.70732	-122.11
CALCP77011728	37.70824	-122.112
CALCP77011720	37.70709	-122.111
CALCP77011697	37.70736	-122.113
CALCP77011696	37.70741	-122.113
CALCP77011739	37.70692	-122.112
CALCP77011681	37.70624	-122.114
CALCP77011702	37.70736	-122.111
CALCP77009359	37.7061	-122.105

CALCP77011693	37.70716	-122.114
CALCP77011747	37.70638	-122.116
CALCP77011711	37.7053	-122.108
CALCP77011695	37.70753	-122.114
CALCP77009365	37.70452	-122.106
CALCP77011682	37.70661	-122.114
CALCP77009420	37.70684	-122.108
CALCP77011708	37.70484	-122.108
CALCP77011735	37.70588	-122.109
CALCP77009438	37.70923	-122.11
CALCP77009413	37.71065	-122.109
CALCP77009415	37.70836	-122.11
CALCP77009412	37.71097	-122.11
CALCP77009418	37.70743	-122.108
CALCP77009410	37.71052	-122.11
CALCP77009419	37.70717	-122.108
CALCP77011707	37.70431	-122.107
CALCP77009407	37.70976	-122.11
CALCP77009411	37.71087	-122.11
CALCP77009408	37.71	-122.11
CCDI263235900	37.92189	-121.904
CALCP77009414	37.70855	-122.109
CALCP77009434	37.70428	-122.106
CALCP77011732	37.70696	-122.11
CCDI273537248	37.92487	-121.996
CALCP77009363	37.70547	-122.105
CALCP77009364	37.70526	-122.106
CALCP77011741	37.70784	-122.112
CALCP77009431	37.7066	-122.106
CALCP77009445	37.70499	-122.106
CALCP77011736	37.7056	-122.108
CALCP77011733	37.70652	-122.109
CALCP77009432	37.70688	-122.106
CALCP77011673	37.70727	-122.109
CALCP77011675	37.70779	-122.109
CALCP77011734	37.70613	-122.109
CALCP77011710	37.70526	-122.107
CALCP77011698	37.70713	-122.113
CALCP77011729	37.70851	-122.112
CALCP77011731	37.70825	-122.113
CALCP77011738	37.70724	-122.112
CALCP77009348	37.70646	-122.106
CALCP77011677	37.70574	-122.107
CALCP77009424	37.7074	-122.107
CALCP77011743	37.70862	-122.113

CALCP77009425	37.70762	-122.106
CALCP77011737	37.70676	-122.11
CALCP77011724	37.70585	-122.11
CALCP77011719	37.70711	-122.11
CALCP77011678	37.70765	-122.11

3. **GO 95, Rule 31.2, Inspection of Lines,** states:

   "Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard."

   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."

   GO 128, Rule 17.2, Inspection states:

   "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."

   Comcast only routinely schedules detailed inspections of its communication lines and facilities in Tier 2 and Tier 3 HFTD. In all other areas, inspections only take place during other scheduled work. When sending a technician into the field to perform an assigned work order or investigate an issue, the technician inspects the assigned pole and the associated assets, along with one span in each direction. Comcast has no regular schedule for detailed inspections and patrols that ensures all poles and assets are inspected thoroughly and completely in non-HFTD. For non-HFTD areas, an inspection program based on the random probability of identifying equipment issues during service calls does not allow for a systematic approach that ensures all lines are inspected frequently and thoroughly.

III. Field Inspection

During the field inspection from March 10 to 14, 2025, ESRB staff inspected Comcast's communication facilities in the locations listed in Table 3.

Table 3: Field Inspection Locations

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
1	Pedestal	(37.9335712, -121.9353227)	Clayton
2	Handhole	(37.9336156, -121.9350645)	Clayton
3	Handhole	(37.9336323, -121.9347359)	Clayton
4	Handhole	(37.9336421, -121.9340429)	Clayton
5	Handhole	(37.9336328, -121.9333895)	Clayton
6	Handhole	(37.9336167, -121.9327186)	Clayton
7	Pedestal	(37.9571748, -121.9912856)	Concord
8	Handhole	(37.9573715, -121.9918220)	Concord
9	Handhole	(37.9575248, -121.9920544)	Concord
10	Handhole	(37.9578338, -121.9922012)	Concord
11	Handhole	(37.9581746, -121.9922194)	Concord
12	Pole	(37.9436206, -122.0217662)	Concord
13	Pole	(37.9433419, -122.0221739)	Concord
14	Pole	(37.9431052, -122.0225699)	Concord
15	Pole	(37.9428654, -122.0229447)	Concord
16	Pole	(37.9981110, -122.0266220)	Concord
17	Pole	(37.9980000, -122.0262405)	Concord
18	Pole	(37.9978795, -122.0258398)	Concord
19	Pole	(37.9977614, -122.0253879)	Concord
20	Handhole	(37.9146618, -121.9989134)	Concord
21	Handhole	(37.9144246, -121.9980491)	Walnut Creek
22	Handhole	(37.9145134, -121.9976854)	Walnut Creek
23	Handhole	(37.9144444, -121.9974037)	Walnut Creek
24	Handhole	(37.9150618, -121.9988950)	Walnut Creek
25	Handhole	(37.9157317, -121.9989209)	Walnut Creek
26	Handhole	(37.9092003, -122.0193375)	Walnut Creek
27	Handhole	(37.9091035, -122.0190451)	Walnut Creek
28	Handhole	(37.9089964, -122.0188376)	Walnut Creek
29	Handhole	(37.9088421, -122.0186455)	Walnut Creek
30	Pole	(37.9340348, -122.0528084)	Walnut Creek
31	Pole	(37.9336421, -122.0526596)	Walnut Creek

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
32	Pole	(37.9344711, -122.0527377)	Walnut Creek
33	Pole	(37.9348733, -122.0526462)	Walnut Creek
34	Pole	(37.9350238, -122.0524195)	Walnut Creek
35	Pole	(37.9350380, -122.0518861)	Walnut Creek
36	Pole	(37.9350317, -122.0514274)	Walnut Creek
37	Pole	(37.8853286, -122.1084733)	Lafayette
38	Pole	(37.8851196, -122.1089511)	Lafayette
39	Pole	(37.8852942, -122.1095318)	Lafayette
40	Pole	(37.8854903, -122.1098728)	Lafayette
41	Pole	(37.8857038, -122.1099251)	Lafayette
42	Pole	(37.8857152, -122.1082286)	Lafayette
43	Pole	(37.8859994, -122.1080599)	Lafayette
44	Pole	(37.8460831, -122.1572470)	Orinda
45	Pole	(37.8462022, -122.1578049)	Orinda
46	Pole	(37.8462581, -122.1583041)	Orinda
47	Pole	(37.8459854, -122.1589471)	Orinda
48	Pole	(37.8459499, -122.1567045)	Orinda
49	Pole	(37.8242627, -122.1250159)	Moraga
50	Pole	(37.8239989, -122.1252919)	Moraga
51	Pole	(37.8236732, -122.1248469)	Moraga
52	Pole	(37.8608488, -122.0144589)	Alamo
53	Pole	(37.8611805, -122.0138483)	Alamo
54	Pole	(37.8605391, -122.0150362)	Alamo
55	Pole	(37.8862018, -122.0670892)	Saranap
56	Pole	(37.8863733, -122.0674935)	Saranap
57	Pole	(37.8864733, -122.0678727)	Saranap
58	Pole	(37.8864654, -122.0681289)	Saranap
59	Pole	(37.8864625, -122.0682861)	Saranap
60	Pole	(37.6822408, -121.7548137)	Livermore
61	Pole	(37.6822294, -121.7541924)	Livermore
62	Pole	(37.6822328, -121.7535678)	Livermore
63	Pole	(37.6822283, -121.7529083)	Livermore
64	Pole	(37.6822333, -121.7523983)	Livermore
65	Pole	(37.6761533, -121.7733330)	Livermore

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
66	Pole	(37.6759957, -121.7733005)	Livermore
67	Pole	(37.6758314, -121.7737826)	Livermore
68	Pole	(37.6756908, -121.7742627)	Livermore
69	Pole	(37.6755637, -121.7746912)	Livermore
70	Pole	(37.6754716, -121.7750181)	Livermore
71	Pole	(37.67533445, -121.77546386)	Livermore
72	Pole	(37.6729965, -121.7829745)	Livermore
73	Pole	(37.6729975, -121.7834912)	Livermore
74	Pole	(37.6730063, -121.7839820)	Livermore
75	Pole	(37.6730158, -121.7844588)	Livermore
76	Pole	(37.6018294, -121.8913706)	Sunol
77	Pole	(37.6020557, -121.8916811)	Sunol
78	Pole	(37.6024887, -121.8918565)	Sunol
79	Pole	(37.6031214, -121.8917515)	Sunol
80	Pole	(37.6321902, -121.8989080)	Pleasanton
81	Pole	(37.6318320, -121.8988637)	Pleasanton
82	Pole	(37.6321844, -121.8986143)	Pleasanton
83	Pole	(37.7011925, -121.9420299)	Dublin
84	Pole	(37.7015676, -121.9422173)	Dublin
85	Pole	(37.7019056, -121.9424067)	Dublin
86	Pole	(37.7023048, -121.9426659)	Dublin
87	Pole	(37.7150136, -122.0471604)	Castro Valley
88	Pole	(37.7154613, -122.0468251)	Castro Valley
89	Pole	(37.7155695, -122.0473190)	Castro Valley
90	Pole	(37.7156080, -122.0480254)	Castro Valley
91	Pole	(37.7562901, -122.0293693)	Brookshire
92	Pole	(37.7567378, -122.0292704)	Brookshire
93	Pole	(37.7825906, -121.9691842)	San Ramon
94	Pedestal	(37.7826097, -121.9692727)	San Ramon
95	Handhole	(37.7824102, -121.9697753	San Ramon
96	Pedestal	(37.7959339, -121.9149603)	Danville
97	Pedestal	(37.7962874, -121.9149000)	Danville
98	Pedestal	(37.7965761, -121.9148852)	Danville
99	Pole	(37.8281138, -121.9914083)	Danville

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
100	Pedestal	(37.8925869, -121.6095077)	Discovery Bay
101	Pedestal	(37.8928843, -121.6096224)	Discovery Bay
102	Pedestal	(37.8931674, -121.6097705)	Discovery Bay
103	Pedestal	(37.8930705, -121.6104471)	Discovery Bay
104	Pedestal	(37.8929332, -121.6109340)	Discovery Bay
105	Pedestal	(37.8928523, -121.6113131)	Discovery Bay
106	Pedestal	(37.8927959, -121.6117195)	Discovery Bay
107	Pedestal	(37.8927850, -121.6121926)	Discovery Bay
108	Handhole	(37.9245157, -121.6213124)	Discovery Bay
109	Handhole	(37.9245416, -121.6212199)	Discovery Bay
110	Handhole	(37.9247140, -121.6207492)	Discovery Bay
111	Handhole	(37.9250340, -121.6204390)	Discovery Bay
112	Pedestal	(37.9252083, -121.6204380)	Discovery Bay
113	Pole	(37.9252842, -121.6229546)	Discovery Bay
114	Vault	(37.9252842, -121.6229546)	Discovery Bay
115	Pole	(37.9307379, -121.6922636)	Brentwood
116	Pole	(37.9308821, -121.6923997)	Brentwood
117	Pole	(37.9311198, -121.6926076)	Brentwood
118	Pole	(37.9313562, -121.6928070)	Brentwood
119	Pole	(37.9315717, -121.6930092)	Brentwood
120	Pole	(37.9318219, -121.6932483)	Brentwood
121	Pole	(37.9765675, -121.6948630)	Oakley
122	Pole	(37.9765838, -121.6954323)	Oakley
123	Pole	(37.9765873, -121.6957404)	Oakley
124	Pole	(37.9765294, -121.6958983)	Oakley
125	Handhole	(37.9765294, -121.6958983)	Oakley
126	Pole	(38.0145666, -121.6418558)	Bethel Island
127	Handhole	(38.0145666, -121.6418558)	Bethel Island
128	Pole	(38.0146765, -121.6424325)	Bethel Island
129	Pole	(38.0147885, -121.6429964)	Bethel Island
130	Pole	(38.0089889, -121.8173189)	Antioch
131	Pole	(38.0086775, -121.8173199)	Antioch
132	Pole	(38.0083367, -121.8170751)	Antioch
133	Pole	(38.0083335, -121.8166832)	Antioch

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
134	Pole	(38.0083335, -121.8163023)	Antioch
135	Pole	(38.0263589, -121.8810555)	Pittsburg
136	Pole	(38.0262487, -121.8806368)	Pittsburg
137	Pole	(38.0352093, -121.8901291)	Pittsburg
138	Pole	(38.0355067, -121.8900000)	Pittsburg
139	Pole	(38.0358275, -121.8898894)	Pittsburg
140	Pole	(38.0359950, -121.8897516)	Pittsburg
141	Pole	(38.0361344, -121.8903065)	Pittsburg
142	Pole	(38.0395091, -121.9687735)	Bay Point
143	Pole	(38.0389137, -121.9690491)	Bay Point
144	Pole	(38.0389998, -121.9695741)	Bay Point
145	Pole	(38.0390980, -121.9697726)	Bay Point
146	Pedestal	(38.0292038, -121.9797327)	Bay Point
147	Handhole	(38.0290900, -121.9801561)	Bay Point
148	Handhole	(38.0287435, -121.9804206)	Bay Point
149	Handhole	(38.0282406, -121.9803653)	Bay Point
150	Pole	(37.9881993, -122.0745005)	Pacheco
151	Pole	(37.9885111, -122.0745032)	Pacheco
152	Pole	(37.9888428, -122.0745176)	Pacheco
153	Pole	(37.9892526, -122.0745306)	Pacheco
154	Pole	(37.9891382, -122.0751405)	Pacheco
155	Pole	(37.9652295, -122.1402354)	Alhambra Valley
156	Pole	(37.9658272, -122.1402069)	Alhambra Valley
157	Pole	(37.9661533, -122.1402314)	Alhambra Valley
158	Pole	(37.9667401, -122.1402159)	Alhambra Valley
159	Pole	(37.9671826, -122.1402481)	Alhambra Valley
160	Pole	(37.9890933, -122.1346195)	Martinez
161	Pole	(37.9888750, -122.1350755)	Martinez
162	Pole	(37.9888750, -122.1350755)	Martinez
163	Pole	(37.9977982, -122.1352646)	Martinez
164	Pole	(37.9982687, -122.1353407)	Martinez
165	Pole	(37.9987868, -122.1354108)	Martinez
166	Pole	(38.0213708, -122.1296350)	Martinez
167	Pole	(38.0212559, -122.1292990)	Martinez

Location #	Structure Type	Approximate Latitude / Longitude Coordinates	City
168	Pole	(38.0210663, -122.1291371)	Martinez
169	Pole	(38.0212768, -122.1291602)	Martinez

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 4:

Table 4: GO 95, Rule 31.1 Findings

Location #	Findings
13	Comcast's power supply conduit near the disconnect box is damaged.
36	Comcast's lashing wire is broken.
59	Comcast needs to transfer its facilities to the new pole.
66	Comcast's lashing wire is broken.
77	Comcast needs to transfer its facilities to the new pole.
117	Comcast needs to transfer its facilities to the new pole.
137	Comcast's lashing wire is broken.

Location #	Findings
158	Comcast's lashing wire is broken.
164	Comcast needs to transfer its facilities to the new pole.

2. **GO 95, Rule 34, Foreign Attachments** states in part:

"Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner's or owners' consent."

ESRB's finding related to the above rule is listed in Table 5:

Table 5: GO 95, Rule 34 Finding

Location #	Finding
122	There are foreign attachments (Christmas lights) tied to Comcast's service drop. During the audit, Comcast immediately notified the customer.

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 6:

Table 6: GO 95, Rule 35 Finding

Location #	Finding
33	Vegetation is causing strain on Comcast's span.

4. **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 7:

Table 7: GO 95, Rule 38, Table 2, Case 16.C Findings

Location #	Findings
14	Comcast's span is tied to Astound's span at the midspan.
35	A spool of Comcast's coaxial cable is dangling from the span and is less than three inches from the communication conductors below it.
48	Comcast's service drop is contacting AT&T's span.
61	Comcast's service drop is contacting AT&T's service drop.
69	Comcast's service drop is contacting AT&T's service drop.
89	Comcast's service drop is contacting two AT&T's service drops.
119	Comcast's span is tied to AT&T's span.
130	Comcast's service drop is contacting AT&T's service drop.

Location #	Findings
138	Comcast's span is tied to AT&T's span at the midspan.
151	Vegetation is causing Comcast's span to contact AT&T's span.

5. **GO 95, Rule 84.4-D(4)(a), Clearances, From Nonclimbable Street Lighting or Traffic Signal Poles or Standards (including mastarms, brackets and lighting fixtures),** states:

   "When passing street lighting, traffic signal poles or standards (including mastarms, brackets and lighting fixtures) a clearance of 12 inches, as specified in Table 1, Case10, Column B, may be reduced when suitable insulation for the highest voltage of open wire involved and mechanical protection from abrasion is provided where necessary. Such mechanical protection shall extend not less than 15 inches in each direction from centerline of pole, standard, attaching mastarm or fixture, whether passing above, below or alongside. There shall be no interference with light distribution from lighting fixtures and workers shall not be hampered or endangered in the performance of their duties."

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

Table 8: GO 95, Rule 84.4-D(4)(a) Finding

Location #	Finding
124	Comcast's cable span is contacting a streetlight.

6. **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 9:

Table 9: GO 95, Rule 84.6-B Findings

Location #	Findings
13	The ground moulding is separating from the surface of the pole and is exposing the ground wire.
99	The ground moulding is damaged and exposes the ground wire.
126	The ground moulding is damaged and exposes the ground wire.
151	The ground moulding is separating from the surface of the pole and is exposing the ground wire.
155	The ground moulding exposes the ground wire at the base of the pole.

7. **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 finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 84.6-D Finding

Location #	Finding
41	Comcast's riser cable is not secured at least every 24 inches.

8. **GO 95, Rule 84.8-C(3)(b), Service Drops, Clearances above Ground and Buildings, Above Ground in Areas Accessible to Pedestrians Only,** states:

   "Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet."

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

Table 11: GO 95, Rule 84.8-C(3)(b) Findings

Location #	Findings
121	Comcast's service drop is less than 10 feet over the house's front yard. Comcast immediately raised the service drop during the audit.
164	Comcast's service drop is less than 10 feet over the house's front yard.

9. **GO 95, Rule 84.8-D(4), Service Drops, Clearances between Conductors, Above or below Supply Service Drops,** states:

"The radial clearance between communication service drop conductors and supply service drop conductors may be less than 48inches 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 finding related to the above rule is listed in Table 12:

Table 12: GO 95, Rule 84.8-D(4) Finding

Location #	Finding
16	Comcast's service drop is contacting PG&E's service drop.

10. **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 in Table 13:

Table 13: GO 95, Rule 86.2 Findings

Location #	Findings
34	Comcast's anchor guy is loose.
153	Comcast's anchor guy is missing. There is a guy hook (Ram's Head) installed on the pole, but no corresponding anchor guy.

11. 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 14:

Table 14: GO 95, Rule 86.7-B Finding

Location #	Finding
131	Vegetation is grounding the guy above the guy insulator.

12. 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 15:

Table 15: GO 95, Rule 86.9 Findings

Location #	Findings
15	Comcast's anchor guy marker is missing. Comcast immediately installed a new guy marker during the audit.
58	Comcast's anchor guy marker is missing. Comcast immediately installed a new guy marker during the audit.
99	Comcast's anchor guy marker is missing. Comcast immediately installed a new guy marker during the audit.
113	Comcast's anchor guy marker is missing. Comcast immediately installed a new guy marker during the audit.

13. 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 16:

Table 16: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
41	Comcast's riser cover exposes the riser cable near the base of the pole.
43	Comcast's riser cable is missing a cover.
76	Comcast's riser cable is missing a cover.
79	Comcast's riser cover exposes the riser cable near the base of the pole.
82	Comcast's riser cable is missing a cover.

14. 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 17:

Table 17: GO 128, Rule 17.1 Findings

Location #	Findings
7	The amplifier is not grounded because the ground rod is missing.
20	The amplifier is not grounded because the ground rod is missing.
23	The end-of-the-line tap is not grounded.
25	The end-of-the-line tap is not grounded.
27	The amplifier is not bonded to the existing ground rod. Comcast immediately repaired the issue during the audit.
94	The doghouse pedestal enclosure was not securely closed upon arrival. Comcast locked the doghouse during the audit. Additionally, the amplifier is not grounded because the ground rod is missing.
101	The amplifier is not grounded because the ground rod is missing.
107	The end-of-the-line tap is not grounded. Additionally, the pedestal enclosure was damaged during the audit while closing the facility after inspection. Comcast must install a new pedestal enclosure.
112	The doghouse pedestal mounting brackets are corroded. Additionally, the amplifier is not grounded because the ground rod is missing.

15. 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 18:

Table 18: GO 128, Rule 17.8 Findings

Location #	Findings
21	The ownership identification on the handhole is faded.
100	The pedestal is not marked with ownership identification.

Location #	Findings
101	The pedestal is not marked with ownership identification.
102	The pedestal is not marked with ownership identification.

16. GO 128, Rule 42.7, Covers states:

> "*Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal (Also See Rule 17.8 and Appendix B, Figure 9).*"

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

Table 19: GO 128, Rule 42.7 Findings

Location #	Findings
8	The handhole cover is cracked.
10	The handhole cover is cracked.
22	The handhole cover does not fit over the enclosure.
125	The handhole cover is not securely closed.

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. Comcast must issue third-party notifications to the respective utilities for these findings. ESRB's findings related to the above rule are listed in Table 20:

Table 20: GO 95, Rule 18-A Findings

Location #	Findings
12	PG&E's anchor guy is loose. Astound's anchor guy is missing a guy marker. The ground moulding of an unknown communication company is damaged and exposes the ground wire.
15	AT&T's ground moulding is damaged and exposes the ground wire.
24	Astound's handhole lid is damaged.
29	AT&T's handhole lid is damaged.
31	Astound's lashing wire is broken.
32	Astound's span is tied to Comcast's span.

Location #	Findings
33	Vegetation is causing strain on AT&T's span. AT&T's service drop is contacting the anchor guy. AT&T's fiber tap has detached from the main span.
34	AT&T's anchor guy is loose. AT&T's service drop is contacting the anchor guy.
35	A spool of Astound's cable is dangling from their span. PG&E's ground moulding is damaged.
37	AT&T's service drop is contacting Comcast's anchor guy.
38	PG&E is missing an anchor guy marker. PG&E's ground moulding is damaged.
39	PG&E's pole step is low.
41	AT&T's riser cover is less than 8 feet. AT&T's riser cable is not secured to the pole.
43	AT&T's riser cable is not covered. Vegetation is grounding PG&E's anchor guy above the insulator.
49	There are giant woodpecker holes along the pole.
50	There is an abandoned AT&T service drop wrapped around the top pole step.
53	PG&E's pole is leaning more than 10%.
54	Verizon's riser cover exposes the riser cable near the base of the pole. Additionally, there is a tracer wire or an unbonded ground wire coming out of the riser cover.
55	Seren's anchor guy is loose. AT&T's anchor guy is loose.
56	Seren's anchor guy is loose. Their lashing wire is also broken. AT&T's anchor guy is loose.
59	The communication companies need to transfer their facilities to the new pole.
60	PG&Es ground moulding is damaged.

Location #	Findings
61	PG&E's ground moulding is detaching from the pole. A pole step is missing on one side of the climbing space, which causes the distance between steps on the same side to exceed 36 inches.
64	AT&T's service drop is contacting Comcast's service drop. PG&E's ground moulding is damaged.
65	AT&T's vertical riser cable is missing a cover, and the cable is not secured every 24 inches.
67	PG&Es ground moulding is damaged.
69	PG&E's neutral wire is severed.
70	The insulation on PG&E's service drop is damaged. AT&T's service drop is abandoned.
72	AT&T's service drop is tied to Comcast's service drop.
73	There are two abandoned AT&T service drops.
76	AT&T's vertical riser cable is missing a cover.
79	AT&T's vertical riser cable is exposed near the base of the pole. AT&T's riser cable is not secured every 24 inches.
80	PG&E's high voltage sign is damaged. There is pole top rot.
81	PG&E's span guy is less than 3 inches from the communication spans.
82	AT&T's overhead enclosure is damaged and is wrapped in a black plastic bag.
88	AT&T's service drop is contacting Comcast's service drop.
89	AT&T's service drop is tied to Comcast's span.
91	There are foreign attachments (advertisement signs) on PG&E's pole.

Location #	Findings
113	AT&T's span contacts Comcast's span at the midspan. AT&T's ground moulding is damaged.
116	AT&T's lashing wire is loose.
119	AT&T's service drop is tied to Comcast's span. AT&T's riser cover exposes the riser cable near the base of the pole.
123	AT&T's span is resting on top of the traffic signal arm. PG&E's anchor guy is missing a marker.
128	AT&T's pole has pole top rot. AT&T's span is lashed into Comcast's span. Vegetation is causing strain and potentially abrasion on AT&T's span.
131	AT&T's service drop is tied to Comcast's span. Vegetation is grounding PG&E's anchor guy above the insulator.
132	AT&T's overhead enclosure is damaged. PG&E's anchor guy is loose.
133	There is an abandoned AT&T service drop.
137	There are two abandoned AT&T service drops.
141	AT&T's span is tied to Comcast's span.
142	AT&T's span contacts Comcast's span.
143	AT&T's service drop is abandoned and tied to the home's rain downspout.
152	AT&T's overhead enclosure is damaged. Astound's service drops are contacting Comcast's and AT&T's service drops.
153	AT&T needs to transfer its facilities to the new pole. AT&T's serviced drop is contacting Astound's service drop.
154	PG&E's anchor guy marker is not eight feet. There is a low pole step. PG&E's ground moulding is damaged.

Location #	Findings
158	AT&T's span guy is loose.
159	PG&E's anchor guy is loose.
160	AT&T needs to transfer its facilities to the new pole. AT&T's riser cable is exposed.
161	AT&T needs to transfer its facilities to the new pole.
164	AT&T's service drop is low. AT&T's service drop is tied to Comcast's span. The communication companies need to transfer their facilities to the new pole.
165	AT&T needs to transfer its facilities to the new pole.
166	There are abandoned AT&T service drops. PG&E's anchor guy marker is not eight feet.
167	PG&E's anchor guy marker is not eight feet.
168	AT&T's riser cover is missing.