STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

July 14, 2025 CA2025-1302

Stephen Kukta
Director – Regulatory Affairs
T-Mobile
45750 Cielito Drive
Indian Wells, CA 92210

SUBJECT: Communication Infrastructure Provider (CIP) Audit of T-Mobile Alameda County Group

Mr. Kukta:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell, Thomas Roberts, and Raffael Herranz of ESRB staff conducted a CIP audit of T-Mobile's Alameda County Group from March 17 to March 21, 2025. The Alameda County Group includes Alameda, Contra Costa, Mariposa, Merced, Marin, Solano, Sacramento, El Dorado, and Placer Counties. During the audit, ESRB staff conducted field inspections of T-Mobile'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 August 11, 2025, by electronic copy of all corrective actions and preventive measures taken by T-Mobile 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 Samuel Mandell at (916) 217-8294 or Samuel.Mandell@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 T-Mobile Alameda County Group

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC

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Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Daniel Pell, Sr. Manager, Engineering Development, T-Mobile

CPUC AUDIT FINDINGS OF T-MOBILE
ALAMEDA COUNTY GROUP

I. Records Review

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

- T-Mobile's Facility Statistics of Alameda County Group
- T-Mobile's Policy and Procedures Manual, September 1, 2018
- T-Mobile's List of Facility Locations
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the Last 5 Years (January 2020 – January 2025)
- Most Recent Work Orders Conducted in the Last 5 Years (January 2020 – January 2025)
- Pole Loading Calculations Conducted in the Last 5 Years (January 2020 – January 2025)
- Safety Hazard Notifications T-Mobile Received and Sent to Third Parties in the Last 5 Years (January 2020 – January 2025)
- Records for Intrusive Pole Inspections Conducted in the Last 5 Years (January 2020 – January 2025)

II. Records Violations

ESRB did not observe any records violations.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities:

Table 1: Field Inspection Locations

Location	Structure ID	Structure Type	GIS Coordinates
1	BA41452B	Wood Pole	37.934554, -122.093243
2	BA01366A	Wood Pole	37.924679, -122.109551
3	BA01373A	Wood Pole	37.916973, -122.09981
4		Padmount Communications	37.465928, -121.905907
5	BA02127A	Wood Pole	37.466221, -121.906103
6	BA0257A	Steel Pole	37.510385, -121.919572
7	BA02717A	Wood Pole	37.592209, -121.956494
8		Padmount Communications	37.592185, -121.95645
9	BA02087A	Wood Pole	37.716806, -122.035411
10	BA01274A	Steel Pole	37.813317, -121.973956
11	BA01228A	Steel Pole	37.832037, -121.996063
12	BA01361A	Wood Pole	37.828437, -122.000107
13		Padmount Communications	37.828078, -121.999186
14	BA01295A	Wood Pole	37.883006, -122.108834
15	BA01348A	Wood Pole	37.885626, -122.118467
16	BA01318A	Wood Pole	37.91442, -122.23405
17	BA01354A	Wood Pole	37.926348, -122.250275
18	BA51988B	Wood Pole	37.942083, -122.263506
19	BA21694A	Wood Pole	37.997052, -122.326128
20	BA52168A	Wood Pole	37.882659, -122.290347
21	BA22904B	Wood Pole	37.876132, -122.286838
22	BA12563J	Wood Pole	37.862419, -122.278657
23	BA12514C	Wood Pole	37.854833, -122.274415
24	BA52576B	Wood Pole	37.889779, -122.251456
25	BA42625A	Wood Pole	37.865537, -122.231402
26	BA52638C	Wood Pole	37.854923, -122.237555
27	BA01292A	Wood Pole	37.90527, -122.142151
28	BA01347A	Wood Pole	37.897162, -122.128594
29	BA02374A	Steel Pole	37.842692, -122.231808

Location	Structure ID	Structure Type	GIS Coordinates
30		Padmount Communications	37.842688, -122.231835
31	BA02099A	Wood Pole	37.830854, -122.222689
32	BA12847A	Wood Pole	37.829482, -122.216475
33	BA52597A	Wood Pole	37.809253, -122.211415
34	BA22582B	Wood Pole	37.803135, -122.196087
35	BA22521A	Wood Pole	37.817634, -122.198377
36	BA02066A	Steel Pole	37.823726, -122.203182
37	BA0206A	Padmount Communications	37.82366, -122.203157
38	BA02153A	Wood Pole	37.831496, -122.196126
39	BA42623A	Wood Pole	37.840125, -122.211736
40	BA42624A	Wood Pole	37.847382, -122.208432
41	BA01367A	Wood Pole	37.982108, -122.115208
42	BA01367A	Wood Pole	37.98214, -122.11531
43	BA01231A	Wood Pole	38.00504, -122.101916
44	BA90345A	Wood Pole	38.148643, -122.109258

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

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

   "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.

   The restoration of clearance originally established prior to the effective date of this Order, where the original clearance has been reduced by additional sagging or other causes, is not considered to be reconstruction and the reestablished clearance shall conform to the requirements of the rules in effect at the time the original clearance was established. The changing of clearance for any other purpose is reconstruction and clearances so changed shall comply with the rules of this Order applicable to reconstruction."

   ESRB's findings related to the above rule are listed in Table 2:

Table 2: GO 95, 12.2 Findings

Location #	Findings
28	Incomplete pole transfer.
34	Incomplete pole transfer.
38	Incomplete pole transfer.

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 3:

Table 3: GO 95, Rule 31.1 Findings

Location #	Findings
3	The pole has a missing lock on the disconnect switch.
17	The pole has a missing lock on the disconnect switch.
17	Ground wire on pole mounted metallic box is not connected.
19	Pole mounted disconnect lid is damaged and not secured.
21	Pole mounted disconnect lid is damaged and not secured.
24	The pole has a missing lock on the disconnect switch.
26	The pole has a missing lock on the disconnect switch.
31	Pole mounted disconnect lid is damaged and not secured.
32	The pole has a missing lock on the disconnect switch.
33	Pole mounted disconnect lid is damaged and not secured.
34	The pole has a missing lock on the disconnect switch.
35	The pole has a missing lock on the disconnect switch.
36	There is an abandoned ground wire and plate at the base of the pole
39	Ground wire on pole mounted metallic box is damaged

Location #	Findings
40	The pole has a missing lock on the disconnect switch.
44	Pole mounted disconnect lid is damaged and not secured.

3. **GO 95, Rule 84.6B – 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 finding related to the above rule is listed in Table 4:

Table 4: GO 95, Rule 84.6B Finding

Location #	Finding
44	The ground cover is damaged, exposing the ground wire.

4. **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 5:

Table 5: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
5	The riser is exposed near the base of the pole.
35	The riser guard is below 8 feet.
36	The riser is missing a suitable covering.
36	The riser is exposed near the base of the pole

5. **GO 95, Rule 94.5B, Marking** states:

"Joint use poles shall be marked with a sign for each antenna installation as follows:

(1) Identification of the antenna operator
(2) A 24-hour contact number of antenna operator for Emergency or Information
(3) Unique identifier of the antenna installation."

ESRB's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 94.5B Findings

Location #	Findings
3	The pole is missing its operator label.
4	The equipment is missing its operator label.
29	The pole is missing its unique identifier.
44	The pole is missing its unique identifier.

6. **GO 95, Appendix H, Exhibit A, Additional Marking Requirements** states in part:

"The Antenna Owner/Operator will place the sign so that it is clearly visible to workers who otherwise climb the pole or ascend by mechanical means and affix said sign:

(i) no less than three (3) feet below the Antenna (measured from the top of the sign); and

(ii) no less than nine (9) feet above the ground line (measured from the bottom of the sign)"

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

Table 7: GO 95, Appendix H, Exhibit A Finding

Location #	Finding
7	The required signage is below 9 feet

7. **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 finding related to the above rule is listed in Table 8:

Table 8: GO 128, Rule 17.1 Finding

Location #	Finding
6	External ground has been cut.

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's findings related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 18-A Findings

Location #	Utility	Findings
3	AT&T	Communication wire on T-Mobile antenna.
5	PG&E	Pole is leaning over 10 percent.
7	AT&T	Riser guard lower than 8 feet.
8	AT&T	Uncovered cables attached to T-Mobile equipment.
9	AT&T	Uncovered riser cables.
11	AT&T	Uncovered riser cables.
12	Unknown	Slack down guy.
15	AT&T	Low span over the road.

17	AT&T	Abandoned fiber hanging to ground.
17	PG&E	Exposed ground rod.
19	AT&T	Slack down guy.
25	PG&E	Loose messenger guy.
28	AT&T	Incomplete pole transfer.
28	Comcast	Incomplete pole transfer.
31	AT&T	Wires contacting multiple down guys.
31	Comcast	Wire contacting down guy.
32	Comcast	Wire contacting AT&T wire.
33	PG&E	Supply service drop contacting communication wires.
34	AT&T	Incomplete pole transfer.
38	AT&T	Incomplete pole transfer.
38	Unknown	Incomplete pole transfer.
39	PG&E	Low pole step.
41	PG&E	Pole leaning greater than 10 percent.
44	PG&E	Damage ground cover.