

PUBLIC UTILITIES COMMISSION

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September 9, 2025

CA2025-1303

Lisa Ludovici
Director, Government Affairs - Central and Northern California
Charter Communications (Charter)
270 Bridge St
San Luis Obispo, CA 93401

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Charter's Crescent City
Region

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell and Stephen Lee of ESRB staff conducted a CIP audit of Charter Crescent City Region from April 28, 2025 through May 2, 2025. During the audit, ESRB staff conducted field inspections of Charter'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 October 8, 2025, via electronic copy of all corrective actions and preventive measures taken by Charter 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 Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

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 Findings of Charter Crescent City Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (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
Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC
Ryan Lindsay, Senior Manager, Construction, Charter Communications

**CHARTER CRESCENT CITY REGION
COMMUNICATIONS AUDIT FINDINGS
April 28 – May 2, 2025**

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Charter Crescent City Region:

- Facility statistics as of March 2025, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Overhead (OH) and Underground (UG) facility maps as of March 2025.
- Current and previous versions of wired and wireless, OH and UG maintenance policies, procedures, and programs, that were effective from March 2020 through March 2025 for compliance with GOs 95 and 128.
- 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 March 2020 through March 2025.
- Corrective Notification records for wired and wireless, OH and UG facilities containing data for inspected facility type, facility location, fire threat district location, repair, due date and completed date from March 2020 through March 2025.
- Safety Hazards Notifications received from third-party utilities from March 2020 through March 2025.
- Safety Hazards Notifications sent to third-party utilities from March 2020 through March 2025.
- Pole loading calculations, including intrusive testing for Tier 2 and Tier 3 High Fire Threat Districts from March 2024 through March 2025.
- Current inspector training program for compliance with GOs 95 and 128.
- New construction projects from March 2024 through March 2025.

II. Records Violations

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

1. General Order (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.*

ESRB reviewed Charter's Crescent City area corrective notifications from March 2020 through March 2025 and found that Charter failed to assign both priority levels and corrective action due dates to its identified violations and Safety Hazards. GO 95 Rule 18 and Charter's own policy requires using prioritization codes and assigning due dates for the corrective action of identified GO 95 violations and Safety Hazards. Charter's Crescent City region must begin tracking priorities and repair timelines to ensure the safety and reliability of its communication system.

2. GO 95, Rule 31.2, Inspection of Lines, states in part:

"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.

A. Communication Lines (See Rule 80.1)"

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. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following factors:

- *Fire threat*
- *Proximity to overhead power line facilities*
- *Terrain*
- *Accessibility*
- *Location, including whether the Communications Lines are located in the High Fire-Threat District"*

During the field audit, ESRB identified 22 unique overhead GO 95 violations out of 31 total violations (or 71%) in non-High Fire Threat District (HFTD) areas. Charter's CPUC Inspection Compliance Program requires patrols for all communication lines throughout the State every 20 years. However, GO 95, Rule 31.2 requires the frequent and thorough inspection of lines to ensure that they are in good condition. ESRB's finding rate of 71% in non-HFTD areas where Charter patrols every 20 years indicates that Charter's current inspection program for its non-HFTD areas is insufficient for complying with GO 95, Rule 31.2.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
1	7216001	Joint Wood Pole	41.781268, -124.170837
2	72116001	Joint Wood Pole	41.780794, -124.171043
3	7216001	Joint Wood Pole	41.780304, -124.170946
4	152406	Joint Wood Pole	41.780005, -124.170784
5	152403	Joint Wood Pole	41.779157, -124.171012
6		Padmount Communications	41.779227, -124.17102
7		Padmount Communications	41.777939, -124.191236
7		Padmount Communications	41.777788, -124.191359
8		Padmount Communications	41.777898, -124.191651
10		Padmount Communications	41.77779, -124.191739
11		Padmount Communications	41.777912, -124.192032
12		Padmount Communications	41.777871, -124.192265
13		Padmount Communications	41.777602, -124.192335
14	173041	Joint Wood Pole	41.773674, -124.208119
15	173063	Joint Wood Pole	41.773766, -124.208263
16	173040	Joint Wood Pole	41.774105, -124.208127
17	173003	Joint Wood Pole	41.774203, -124.208289
18	173002	Joint Wood Pole	41.774328, -124.208138
19	173404	Joint Wood Pole	41.774476, -124.208146
20		Vault	41.761044, -124.223865
21		Padmount Communications	41.761574, -124.224701
22		Padmount Communications	41.761983, -124.224502
23		Padmount Communications	41.762251, -124.224399
24		Padmount Communications	41.762358, -124.224605
25	VZ590051	Joint Wood Pole	41.759869, -124.208164
26	203106	Joint Wood Pole	41.759967, -124.207735
27	203105	Joint Wood Pole	41.759923, -124.207149

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
28	204105	Joint Wood Pole	41.759933, -124.206662
29	204106	Joint Wood Pole	41.759896, -124.206021
30	260305	Joint Wood Pole	41.749296, -124.155548
31	260306	Joint Wood Pole	41.74935, -124.1556
32	260304	Joint Wood Pole	41.749365, -124.155064
33	260303	Joint Wood Pole	41.749279, -124.155037
34	261309	Joint Wood Pole	41.749365, -124.154498
35	261311	Joint Wood Pole	41.749307, -124.154224
36	261307	Joint Wood Pole	41.749364, -124.153752
37	260810	Joint Wood Pole	41.756269, -124.154457
38	260804	Joint Wood Pole	41.756329, -124.154952
39	260805	Joint Wood Pole	41.756248, -124.155524
40	260807	Joint Wood Pole	41.756231, -124.155983
41	07219001-323304	Joint Wood Pole	41.994415, -124.208492
42	323305	Joint Wood Pole	41.994976, -124.208495
43	C8620	Joint Wood Pole	41.995129, -124.208518
44	323306	Joint Wood Pole	41.995479, -124.208544
45	323307	Joint Wood Pole	41.995783, -124.208541
46		Padmount Communications	41.995836, -124.208571
47	86502	Joint Wood Pole	41.966398, -124.202406
48	86501	Joint Wood Pole	41.966397, -124.201697
49	07218001-087502	Joint Wood Pole	41.966359, -124.200801
50	87501	Joint Wood Pole	41.966385, -124.199622
51	174201	Joint Wood Pole	41.947985, -124.205079
52	175202	Joint Wood Pole	41.947967, -124.204558
53	175201	Joint Wood Pole	41.948035, -124.204001
54	176201	Joint Wood Pole	41.947968, -124.203094
54	176202	Joint Wood Pole	41.947966, -124.202353
56	274411	Joint Wood Pole	41.921938, -124.166636
57	274407	Joint Wood Pole	41.921591, -124.166879
58	274304	Joint Wood Pole	41.92103, -124.167201
59	274303	Joint Wood Pole	41.92066, -124.167365
60	263907	Joint Wood Pole	41.929347, -124.14943
61	263905	Joint Wood Pole	41.929397, -124.148692
62	263904	Joint Wood Pole	41.929398, -124.148265
63	263902	Joint Wood Pole	41.92958, -124.1483
64	263901	Joint Wood Pole	41.929782, -124.148314
65		Padmount Communications	41.920368, -124.139351
66		Padmount Communications	41.920344, -124.138831

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
67		Padmount Communications	41.920287, -124.138522
68		Padmount Communications	41.920226, -124.137962
69		Padmount Communications	41.920332, -124.137586
70		Padmount Communications	41.920368, -124.13796
71		Padmount Communications	41.920446, -124.138564
72		Padmount Communications	41.920535, -124.139116
73	07217001-276803	Joint Wood Pole	41.841722, -124.163331
74	276804	Joint Wood Pole	41.84214, -124.162965
75	276805	Joint Wood Pole	41.842622, -124.162737
76	352400	Joint Wood Pole	41.822647, -124.151458
77	352401	Joint Wood Pole	41.822328, -124.150596
78		Joint Wood Pole	41.82268, -124.152633
79	07216001-039703	Joint Wood Pole	41.812225, -124.157898
80	39701	Joint Wood Pole	41.812182, -124.156891
81	20702	Joint Wood Pole	41.812142, -124.1561
82	20700	Joint Wood Pole	41.812196, -124.155494
83	48104	Joint Wood Pole	41.803771, -124.178855
84	48102	Joint Wood Pole	41.804055, -124.179266
85	48101	Joint Wood Pole	41.804254, -124.1796
86	48100	Joint Wood Pole	41.804642, -124.180146
87	07117002-212000	Joint Wood Pole	41.843683, -123.958257
88	212002	Joint Wood Pole	41.8434, -123.958236
89	212003	Joint Wood Pole	41.844065, -123.959069
90	212004	Joint Wood Pole	41.844033, -123.958898
91	211101	Joint Wood Pole	41.844922, -123.959541
92	211102	Joint Wood Pole	41.845278, -123.959876
93	GA1147002	Joint Wood Pole	41.847687, -123.959359
94	196206	Joint Wood Pole	41.846241, -123.989859
95		Padmount Communications	41.846231, -123.989841
96	196207	Composite Pole	41.846303, -123.988835
97	197205	Joint Wood Pole	41.846494, -123.987924
98	197203	Joint Wood Pole	41.846359, -123.987876
99	07116001-102506	Composite Pole	41.79582, -124.055225
100	101401	Joint Wood Pole	41.79545, -124.055673
101	101402	Composite Pole	41.794852, -124.055917
102	101403	Joint Wood Pole	41.794312, -124.055876

Location #	Structure ID	Structure Type	Approximate GPS Coordinates
103	101300	Joint Wood Pole	41.793546, -124.055843
104	101001	Composite Pole	41.789157, -124.057499
105	101000	Joint Wood Pole	41.789864, -124.057408
106	96207	Joint Wood Pole	41.792951, -124.066953
107	96300	Joint Wood Pole	41.793454, -124.06697
108	96302	Joint Wood Pole	41.794028, -124.066958
109	96303	Joint Wood Pole	41.794034, -124.067103
110	VZ66061	Comms-Only Wood Pole	41.827868, -124.104283
111	VZ66060	Comms-Only Wood Pole	41.827394, -124.104773
112		Comms-Only Wood Pole	41.826961, -124.105308
113	VZ66058	Comms-Only Wood Pole	41.826549, -124.10573
114	02/68	Joint Wood Pole	41.860817, -124.122236
115	1/68, 137160	Joint Wood Pole	41.859735, -124.122415
116	137000	Joint Wood Pole	41.858881, -124.122399
117	VZ66100	Joint Wood Pole	41.85855, -124.122527

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.”

ESRB’s findings related to the above rule are listed in Table 1:

Table 1: GO 95, Rule 31.1 Findings

Location	Findings
73	Incomplete pole transfer
79	Incomplete pole transfer
96	Incomplete pole transfer
113	Broken lashing wire

2. 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 finding related to the above rule is listed in Table 2:

Table 2: GO 95, Rule 84.6-B Finding

Location	Finding
107	Exposed ground wire

3. 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 3:

Table 3: GO 95, Rule 84.6-D Finding

Location #	Finding
2	Loose vertical cables, greater than 24 inches between supports

4. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, etc. states:

“Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.

The clearances specified in Table 1, Case 1, Columns A, B, D, E and F, shall in no case be reduced more than 5% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions. The clearances specified in Table 1, Cases 2 to 6 inclusive, shall in no case be reduced more than 10% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions.

The clearance specified in Table 1, Case 1, Column C (22.5 feet), shall in no case be reduced below the tabular value because of temperature and loading as specified in Rule 43.

The clearances specified in Table 1, Cases 11, 12 and 13, shall in no case be reduced below the tabular values because of temperatures and loading as specified in Rule 43. Where supply conductors are supported by suspension insulators at crossings over railroads which transport freight cars, the initial clearances shall be sufficient to prevent reduction to clearances less than 95% of the clearances specified in Table 1, Case 1, through the breaking of a conductor in either of the adjoining spans. Where conductors, dead ends, and metal pins are concerned in any clearance specified in these rules, all clearances of less than 5 inches shall be applicable from surface of conductors (not including tie wires), dead ends, and metal pins, except clearances between surface of crossarm and conductors supported on pins and insulators (referred to in Table 1, Case 9) in which case the minimum clearance specified shall apply between center line of conductor and surface of crossarm or other line structure on which the conductor is supported.

All clearances of 5 inches or more shall be applicable from the center lines of conductors concerned.

When measuring the minimum allowable vertical conductor clearances in a span, the minimum clearance applies to the specific location under the span being measured and not for the entire span.”

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

Table 4: GO 95, Rule 37 Findings

Location	Findings
2	Low service drop
91	Low span along road. Service drop is also low.

5. 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 points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.”

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

Table 5: GO 95, Rule 38 Finding

Location	Finding
32	Charter equipment contacting phone line

6. 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 finding related to the above rule is listed in Table 6:

Table 6: GO 95, Rule 86.2 Finding

Location	Finding
88	Broken down guy

7. GO 95, Rule 86.6-B(2), Sectionalizing and Grounding Requirements, Guys in Proximity states:

“Every overhead or anchor guy, any portion of which is in proximity to a wood pole and supply conductors of 0 - 35,500 volts (see Appendix G, Figures 45, 48 and 49) shall be sectionalized by means of insulators as specified in Rule 86.7–A2 or Rule 86.7–B, and no portion in proximity to such supply conductors shall be grounded. Excepted from this requirement are anchor guys, and grounded overhead guys, which are attached to poles at a level less than 8 feet but not less than 6 feet below the level of supply conductors provided the level of the guy attachment is at or below the level of communication cable messenger attached to the same pole (see Appendix G, Figures 48a and 49f).

Also excepted from this requirement are anchor guys, and grounded overhead guys, which are attached to poles at a level less than 6 feet but not less than 4 feet below the level of supply conductors of 0 - 750 volts provided such guys are extensions of or attached to a cable messenger, are in the same vertical plane (or extension thereof) as the messenger, and are below the guard arms required by Rule 87.7–B for such a messenger (see Appendix G, Figure 48a).”

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

Table 7: GO 95, Rule 86.6-B(2) Findings

Location	Findings
3	Guy in proximity needs sectionalizer
4	Guy in proximity needs sectionalizer

8. GO 95, Rule 87.4-C(3), Clearance Between Conductors and Cables, Attached to poles states in part:

“Cables or messengers where attached to the surface of poles which support supply conductors, shall not be less than 6 feet vertically below the level of supply conductors.”

*“**EXCEPTION:** This minimum clearance of 6 feet may be reduced to not less than 4 feet below supply conductors of 0 - 750 volts provided a guard arm is placed above the messenger and cable (or self-supporting cable) in accordance with the provision of Rule 87.7-B (see Rule 21.0-D for guard arm definition). No cable or messenger shall be attached to the surface of such a pole less than 2 feet below the lowest level of communication conductors on crossarms unless a minimum horizontal separation of 30 inches is maintained between the messenger or cable and the communication conductors on the opposite side of pole.”*

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

Table 8: GO 95, Rule 87.4-C(3) Finding

Location	Finding
4	Missing guard arm

9. 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 9:

Table 9: GO 95, Rule 87.7-D(1) Findings

Location	Findings
2	Missing riser guard
5	Missing riser guard
19	Damaged riser guard
31	Missing riser guard
37	Missing riser guard
38	Missing riser guard
40	Missing riser guard
41	Missing riser guard
45	Missing riser guard
48	Missing riser guard
49	Missing riser guard
76	Missing riser guard
94	Missing riser guard
98	Missing riser guard
101	Missing riser guard
104	Missing riser guard
115	Damaged riser guard
116	Missing riser guard

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 10:

Table 10: GO 128, Rule 17.8 Findings

Location	Findings
6	Missing ownership label
7	Missing ownership label
8	Missing ownership label
10	Missing ownership label
11	Missing ownership label
12	Missing ownership label
13	Missing ownership label
20	Missing ownership label
21	Missing ownership label, corrected in the field
22	Missing ownership label, corrected in the field
23	Missing ownership label
24	Missing ownership label
65	Missing ownership label
66	Missing ownership label
67	Missing ownership label
68	Missing ownership label
69	Missing ownership label
70	Missing ownership label
71	Missing ownership label

Location	Findings
72	Missing ownership label
95	Missing ownership label

11. 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 11:

Table 11: GO 128, Rule 17.1 Findings

Location	Findings
6	The pedestal is broken and cannot be secured
7	Ground wire was disconnected, corrected in the field
8	The pedestal is broken and cannot be secured
10	Pedestal lid is not secured, corrected in the field
11	Pedestal lid is not secured
21	Missing ground
46	Lid is damaged and cannot be opened
49	Missing ground

12. GO 128, Rule 41.4(C), Requirements for Communication Systems, Depths states:

“Ducts carrying communication cables and conductors for public use shall be constructed at a depth to provide not less than 18 inches of cover below the surface under which they are located, except as otherwise provided in these rules.”

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

Table 12: GO 128, Rule 41.4(C) Finding

Location	Finding
46	Service drop needs to be buried

V. Observations

1. GO 95, Rule 18, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards 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 noted the third-party observations listed in Table 13:

Table 13: Third-Party Observations

Location	Entity	Violation Description
3	Frontier	Abandoned drop
3	Frontier	Uncovered riser
5	Frontier	Missing riser and clearance to Charter riser
7	Frontier	Underground service not buried
23	Frontier	Pedestal rusted and decayed
25	Frontier	Needs pole transfer
27	PacifiCorp	Broken ground molding and unauthorized attachment

Location	Entity	Violation Description
38	Frontier	Riser breaking apart
43	Frontier	Unauthorized attachments to pole, exposed riser
45	PacifiCorp	Exposed ground
46	Frontier	Bury drop
48	PacifiCorp	Exposed ground
48	Frontier	Splice box resting on service drop riser
50	PacifiCorp	Unauthorized attachment, fence on pole
50	Frontier	Abandoned drop
51	PacifiCorp	Exposed ground
53	Frontier	Broken ground molding
54	Frontier	Missing down guy
54	Frontier	Abandoned facilities on ground
56	Frontier	Broken down guy
59	Frontier	Abandoned drop contacting Charter, damaged pedestal at pole base
60	Frontier	Needs pole transfer
63	PacifiCorp	Vegetation above guy bob
64	Frontier	Riser exposed
73	Frontier	Needs pole transfer
79	Frontier	Needs pole transfer, also broken lashing wire midspan
81	PacifiCorp	Exposed ground
82	Frontier	Abandoned drop
82	PacifiCorp	Exposed ground rod
83	PacifiCorp	Exposed ground, severed at base
85	Frontier	Abandoned through bolt falling out of pole
90	PacifiCorp	Improper grounding

Location	Entity	Violation Description
91	Frontier	Low span over road
91	PacifiCorp	Exposed ground
92	PacifiCorp	Exposed ground
94	Frontier	Tree growing into line
96	Frontier	Needs pole transfer
98	PacifiCorp	Vegetation overtaking pole
99	Frontier	Needs pole transfer
103	PacifiCorp	Slack down guy
104	Frontier	Not properly secured to pole
105	Frontier	Contacting cable lines
107	Frontier	Phone service laying on span
108	Frontier	Abandoned drop
110	Frontier	Replace pole
112	Frontier	Vegetation causing clearance issues
113	Frontier	Broken lashing wire
114	PacifiCorp	Exposed ground