STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

May 22, 2025 CA2025-1309

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

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

Mr. Kukta:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Javier Reyes of ESRB staff conducted a CIP audit of T-Mobile's San Francisco County Group from March 3 to March 7, 2025. The San Francisco County Group includes San Francisco, San Mateo, Santa Clara, Santa Cruz and Monterey County. 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 June 23, 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 Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@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 San Francisco 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

SAN FRANCISCO 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 San Francisco 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 – December 2024)
- Most Recent Work Orders Conducted in the Last 5 Years (January 2020 – December 2024)
- Pole Loading Calculations Conducted in the Last 5 Years (January 2020 – December 2024)
- Safety Hazard Notifications T-Mobile Received and Sent to Third Parties in the Last 5 Years (January 2020 – December 2024)
- Records for Intrusive Pole Inspections Conducted in the Last 5 Years (January 2020 – December 2024)

II. Records Violations

ESRB did not observe any records violations.

III. Field Inspection

During the field inspection from March 3 – 7, 2025, ESRB staff inspected T-Mobile's wireless communication facilities in the locations listed in Table 1.

Table 1: Field Inspection Locations

Location #	Address/GPS Location	Structure Type	Structure #
1	4402 Pacheco St. San Francisco, CA	Pole	SF53522A
2	1941 Noriega St. San Francisco, CA	Pole	110050282
3	2001 Noriega St. San Francisco, CA	Pole	SF43568B
4	2021 Noriega St. San Francisco, CA	Pole	110050280
5	5549 Anza St. San Francisco, CA	Pole	SF53516A
6	190 23rd Ave. San Francisco, CA	Pole	SF53540A
7	6101 California St. San Francisco, CA	Pole	110048249
8	223 23rd Ave. San Francisco, CA	Pole	110048248
9	239 23rd Ave. San Francisco, CA	Pole	110048247
10	2503 15th St. San Francisco, CA	Pole	SF23235C
11	5 Bird St. San Francisco, CA	Pole	SF43579D
12	Dearborn St. & Bird St. San Francisco, CA	Pole	110012933
13	897 Carolina St. San Francisco, CA	Pole	SF23285E
14	Carolina St. & 22nd San Francisco, CA	Pole	N/A
15	98 Mullen St. San Francisco, CA	Pole	SF43645A
16	81 Mullen St. San Francisco, CA	Pole	110034990
17	45 Mullen St. San Francisco, CA	Pole	110034877
18	200 Elliot St. San Francisco, CA	Pole	BA10040H
19	396 Arleta St.	Pole	110032939

Location #	Address/GPS Location	Structure Type	Structure #
	San Francisco, CA		
20	1399 Middle Ave. Menlo Park, CA	Pole	SF53945C
21	1399 Middle Ave. Menlo Park, CA	Pedestal	SF53945C
22	1705 Valparaiso Ave. Menlo Park, CA	Pole	SF53935D
23	1705 Valparaiso Ave. Menlo Park, CA	Pedestal	SF53935D
24	83 Linda Vista Ave. Atherton, CA	Pole	SF53335A
25	243 Polhemus Ave. Atherton, CA	Pole	SF03362A
26	243 Polhemus Ave. Atherton, CA	Pedestal	SF03362A
27	1670 Stockbridge Ave. Redwood City, CA	Pole	SF53933C
28	1670 Stockbridge Ave. Redwood City, CA	Pedestal	SF53933C
29	172 Stockbridge Ave. Redwood City, CA	Pole	SF03216A
30	132 Selby Ln. Atherton, CA	Pole	SF03229A
31	132 Selby Ln. Atherton, CA	Pedestal	SF03229A
32	205 Austin Ave. Atherton, CA	Pole	SF03167A
33	205 Austin Ave. Atherton, CA	Pedestal	SF03167A
34	101 Tuscaloosa Ave. Atherton, CA	Pole	SF03214A
35	119 Atherton Ave. Atherton, CA	Pole	SF03212A
36	119 Atherton Ave. Atherton, CA	Pedestal	SF03212A
37	113 Middlefield Rd. Atherton, CA	Pole	SF03140A
38	177 Watkins Ave. Atherton, CA	Pole	SF53946C
39	2586 Trimble Rd. San Jose, CA	Pole	SF15001H
40	2586 Trimble Rd. San Jose, CA	Pedestal	SF15001H

Location #	Address/GPS Location	Structure Type	Structure #
41	1542 Stone Creek Dr. San Jose, CA	Pole	SF14959C
42	1542 Stone Creek Dr. San Jose, CA	Pedestal	SF14959C
43	1420 San Marcos Dr. San Jose, CA	Pole	SF55683D
44	1420 San Marcos Dr. San Jose, CA	Pedestal	SF55683D
45	3867 Suncrest Ave. San Jose, CA	Pole	SF24696B
46	14888 Joanne Ave. San Jose, CA	Pole	SF24459D
47	14888 Joanne Ave. San Jose, CA	Pedestal	SF24459D
48	646 White Rd. San Jose, CA	Pole	SF15042E
49	630 White Rd. San Jose, CA	Pedestal	SF15042E
50	1923 McLaughlin Ave. San Jose, CA	Pole	SF24847H
51	1923 McLaughlin Ave. San Jose, CA	Pedestal	SF24847H
52	6262 Bothel Circle San Jose, CA	Pole	SF15069A
53	6267 Bothel Circle San Jose, CA	Pedestal	SF15069A
54	6102 Glen Harbor Dr. San Jose, CA	Pole	SF24681A
55	6102 Glen Harbor Dr. San Jose, CA	Pedestal	SF24681A
56	6099 Terrier Ct. San Jose, CA	Pole	SF24874A
57	6099 Terrier Ct. San Jose, CA	Pedestal	SF24874A
58	254 Copco Ln. San Jose, CA	Pole	SF54281C
59	254 Copco Ln. San Jose, CA	Pedestal	SF54281C
60	5338 Snell Ave. San Jose, CA	Pole	SF24424D
61	5338 Snell Ave. San Jose, CA	Pedestal	SF24424D
62	15018 Charlotte Ave. San Jose, CA	Pole	SF24662D

Location #	Address/GPS Location	Structure Type	Structure #
63	15018 Charlotte Ave. San Jose, CA	Pedestal	SF24662D
64	6056 Calle de Rico San Jose, CA	Pole	SF15901F
65	6056 Calle de Rico San Jose, CA	Pedestal	SF15901F
66	5637 Rotterdam Ln. San Jose, CA	Pole	SF54215D
67	5637 Rotterdam Ln. San Jose, CA	Pedestal	SF54215D
68	1602 Hallbrook Dr. San Jose, CA	Pole	SF24462D
69	1602 Hallbrook Dr. San Jose, CA	Pedestal	SF24462D
70	1805 Lincoln Ave. San Jose, CA	Pole	SF15124B
71	1805 Lincoln Ave. San Jose, CA	Pedestal	SF15124B
72	1999 Heatherdale Ave. San Jose, CA	Pole	SF14168G
73	1999 Heatherdale Ave. San Jose, CA	Pedestal	SF14168G
74	4545 Moorpark Ave. San Jose, CA	Pole	SF15052F
75	4545 Moorpark Ave. San Jose, CA	Pedestal	SF15052F
76	1303 Flora Ave. San Jose, CA	Pole	SF44742B
77	1303 Flora Ave. San Jose, CA	Pedestal	SF44742B
78	4869 Bucknall Rd. San Jose, CA	Pole	BA52162A
79	4869 Bucknall Rd. San Jose, CA	Pedestal	BA52162A
80	6017 Wellfleet Way San Jose, CA	Pole	SF54255B
81	1005 Olmo Ct. San Jose, CA	Pole	SF15063C
82	22480 Walnut Circle San Jose, CA	Pole	SF04638A
83	92 Franklin Ave. South San Francisco	Pole	SF03184A
84	806 Banbury Ln. Millbrae, CA	Pole	SF53916C

Location #	Address/GPS Location	Structure Type	Structure #
85	311 Ashton Ave. Millbrae, CA	Pole	SF53188A
86	400 Pullman Rd. Hillsborough, CA	Pole	SF03194A
87	400 Pullman Rd. Hillsborough, CA	Pedestal	SF03194A
88	1325 Avondale Rd. Hillsborough, CA	Pole	SF03160A
89	1120 Crystal Springs Rd. Hillsborough, CA	Pole	SF03163A
90	400 Peninsula Ave. Burlingame, CA	Pole	SF13065G
91	501 N. Delaware St. San Mateo, CA	Pole	SF53923A

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **General Order (GO) 95, Rule 31.1 Design, Construction** 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 2:

Table 2: GO 95, Rule 31.1 Findings

Location #	Findings
6	T-Mobile has a broken cable. Finding was fixed in field.
15	T-Mobile cable is not secured to pole.
37	Birds nest was found in the T-Mobile cables.

2. **GO 95, Rule 87.4 H From Grounded Metal Boxes, Hardware and Equipment Associated with Supply Lines** states:

   "Cables and messengers installed on non-metallic poles or non-metallic structures shall have a minimum clearance of 48 inches below or 72 inches above grounded metal boxes, hardware or metal cases for equipment associated with supply lines.

   Exceptions:

(1) The 72 inches above may be reduced 48 inches where there is not a pole mounted communication drop distribution terminal above the grounded metal box, hardware or metal case for equipment, or where the grounded metal box, hardware or metal case for equipment is securely bonded to the communication cable and/or messenger (see Figure 54-4).

(2) The 72 inches above may be reduced to 48 inches when the grounded metal box, hardware or metal case for equipment is on the opposite side of a pole from a pole mounted communication drop distribution terminal."

ESRB's findings related to the above rule are listed in Table 3:

Table 3: GO 95, Rule 87.4 H Findings

Location #	Findings
32	Grounded metal equipment does not meet 72 inch clearance with messenger above.
34	Grounded metal equipment does not meet 72 inch clearance with messenger above.
38	Grounded metal equipment does not meet 48 inch clearance with messenger above. This location falls under exception (1) since the pole does not have a communication drop distribution terminal above the grounded metal equipment.
85	Grounded metal equipment does not meet 48 inch clearance with messenger above. This location falls under exception (1) since the pole does not have a communication drop distribution terminal above the grounded metal equipment.
91	Grounded metal equipment does not meet 48 inch clearance with messenger above. This location falls under exception (1) since the pole does not have a communication drop distribution terminal above the grounded metal equipment.

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

Table 4: GO 95, Rule 84.6B Findings

Location #	Findings
1	There is an exposed ground wire at base of pole.
3	There is an exposed ground wire at base of pole.

4. **GO 95, Rule 84.7A – Climbing Space** states:

“Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c , 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

The climbing space shall be maintained in the same position on the pole for minimum vertical distance of 4 feet above and below each conductor level through which it passes, excepting that where a cable is attached to a crossarm or a pole with the cable less than 9 or 15 inches from the center line of the pole supporting conductors on line arms (no buck arm construction involved) in accordance with the provisions of Rules 84.4–D1 or 87.4–C3 , the 4 foot vertical distance may be reduced to not less than 3 feet.

The position of the climbing space shall not be shifted more than 90 degrees around the pole within a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.

The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–A5.”

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

Table 5: GO 95, Rule 84.7A Finding

Location #	Finding
11	Vegetation is impeding climbing space.

5. **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 6:

Table 6: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
30	T-Mobile cable is missing a riser.
35	T-Mobile riser is below 8 feet.
48	T-Mobile riser is below 8 feet.
62	T-Mobile riser is below 8 feet.
72	T-Mobile riser is below 8 feet.
74	T-Mobile riser is below 8 feet.

6. **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 7:

Table 7: GO 95, Rule 94.5B Findings

Location #	Findings
15	SF43645A is missing the identification of the antenna operator. Site is also missing the unique identifier.
20	SF53945C is missing the unique identifier.
22	SF53935D is missing the unique identifier.
30	SF03229A is missing the unique identifier.
39	SF15001H is missing the unique identifier.
43	SF55683D is missing the unique identifier.
45	SF24696B is missing the unique identifier.
46	SF24459D is missing the unique identifier.
48	SF15042E is missing the unique identifier.
50	SF24847H is missing the unique identifier.
58	SF54281C is missing the unique identifier.
60	SF24424D is missing the unique identifier.
62	SF24662D is missing the unique identifier.
64	SF15901F is missing the unique identifier.
66	SF54215D is missing the unique identifier.
68	SF24462D is missing the unique identifier.
72	SF14168G is missing the unique identifier.

Location #	Findings
74	SF15052F is missing the unique identifier.
76	SF44742B is missing the unique identifier.
86	SF03194A is missing the unique identifier.

7. **GO 128, Rule 17.1, Design, Construction and Maintenance** states:

"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service."

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

Table 8: GO 128, Rule 17.1 Findings

Location #	Findings	Notes
47	Pedestal is missing NFPA sticker.	
49	Pedestal is missing NFPA sticker.	
51	Pedestal is missing NFPA sticker.	
57	Pedestal is missing locks.	T-Mobile added a lock in the field.
59	Pedestal is missing NFPA sticker.	
61	Pedestal is missing NFPA sticker.	
63	Pedestal is missing NFPA sticker.	
71	Pedestal is missing NFPA sticker.	
75	Pedestal is missing NFPA sticker.	

Location #	Findings	Notes
76	Pedestal is missing NFPA sticker.	
79	Pedestal is missing NFPA sticker.	

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 #	Findings	Notes
1	PG&E has an exposed ground wire.	
1	PG&E has a missing lock on panel box.	
1	Communications needs transfer of facilities to new pole.	
2	Telco has an abandoned service drop.	

Location #	Findings	Notes
3	PG&E has a missing lock on panel box.	
3	Communications utility has an exposed ground wire.	
4	Communications utility has a service drop in contact with other communications conductors.	
5	PG&E has a missing lock on panel box.	
6	PG&E has a missing lock on panel box.	
11	PG&E has a missing lock on panel box.	
13	PG&E has a missing lock on panel box.	
14	Telco has an abandoned service drop.	
15	PG&E has a missing lock on panel box.	
18	PG&E has a missing lock on panel box.	
20	PG&E needs to remove an idle facility.	
20	PG&E has a missing lock on panel box.	
20	PG&E has an exposed ground wire.	
20	Telco conductor is missing a riser.	
22	PG&E has a missing lock on panel box.	
22	There is vegetation strain on communication conductors midspan.	

Location #	Findings	Notes
22	Telco has a riser below 8 feet.	
24	Telco has a riser below 8 feet.	
27	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.
27	There is a broken communications ground wire.	
29	Telco conductor is missing a riser.	
29	There are abandoned communications service drops.	
32	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.
33	Pole has a low pole step.	
33	PG&E has a missing lock on panel box.	
33	Telco has a riser below 8 feet.	
37	There are communication service drops in contact with the antenna.	
38	There is vegetation strain on communication conductors midspan.	
39	PG&E has a missing lock on panel box.	
41	PG&E has a missing lock on panel box.	
41	Pole has a low pole step.	
43	Telco has a loop slack in contact with T-Mobile facilities.	

Location #	Findings	Notes
43	PG&E has a missing lock on panel box.	
43	Telco has a riser below 8 feet.	
45	PG&E has a missing lock on panel box.	
45	Telco conductor is missing a riser.	
48	Telco has a riser below 8 feet.	
50	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.
50	Telco has an exposed ground wire.	
50	Pole has a low pole step.	
58	Telco has a riser below 8 feet.	
58	Telco has an exposed ground wire.	
60	Pole has a low pole step.	
60	Telco has a riser below 8 feet.	
66	Telco has a riser below 8 feet.	
68	Telco has a riser below 8 feet.	
68	Telco conductor is not attached to the pole.	
72	Telco has a riser below 8 feet.	
76	PG&E has a missing lock on panel box.	

Location #	Findings	Notes
76	Telco has a riser below 8 feet.	
80	CATV has an exposed ground wire.	
81	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.
82	Telco has a conductor in contact with T-Mobile facilities.	
83	Telco has an idle facility on pole.	
84	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.
85	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.
85	CATV has an exposed ground wire.	
86	Telco has a missing lock on panel box.	
87	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.
88	Telco has a riser below 8 feet.	
89	Telco has a riser below 8 feet.	
90	There is a loose communications guy wire.	
90	There is an exposed communications ground wire.	
90	PG&E has a missing lock on panel box.	T-Mobile added a lock in the field.
91	PG&E has a missing lock on panel box.	