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

April 15, 2025

CA2025-1314

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

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Monterey and San Benito Counties

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Matthew Yunge and Monica Hoskins of ESRB staff conducted a communication audit of AT&T Monterey and San Benito Counties from February 18, 2025 through February 21, 2025. During the audit, ESRB staff conducted field inspections of AT&T's communication 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 May 13, 2025, by electronic copy of all corrective actions and preventive measures taken by AT&T to correct the identified violations and prevent the recurrence of such violations.

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 Matthew Yunge at (415) 603-9828 or matthew.yunge@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 Communication Audit Report for AT&T Monterey and San Benito County Region

Cc:

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AT&T MONTEREY AND SAN BENITO COUNTY REGION
COMMUNICATIONS AUDIT FINDINGS
February 18 – February 21, 2025

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for AT&T's Monterey and San Benito County Region:

- Facility statistics as of February 2025, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Map of the Audit Area.
- AT&T Overhead Lines Maintenance Plan, GO 95 Rule 18, Version 5.5, August 30, 2024.
- Employee statistics and employee training records.
- Inspection and patrol records containing data for the inspected facility type, facility location, fire threat district location, inspection date from November 2020 to January 2024.
- AT&T Visual Inspection of Overhead Line, GO 95 Rule 80.1A, November 15, 2024.
- Records of OH and UG corrective actions completed from January 2020 to December 2024.
- Records for intrusive pole inspections conducted from April 2023 to November 2023.
- Records for all outgoing Safety Hazard notifications, from April 2020 to October 2024.
- Records for all incoming Safety Hazard notifications, from November 2022 to June 2024.
- A list of all pole safety factor calculations completed from April 2020 to August 2024.
- A list of all new OH and UG construction projects completed from September 2024 to November 2024.

II. Records Violations

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

1. **GO 128, Rule 17.2, Inspection** states in part:

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

AT&T provided no procedures to ensure underground assets are inspected thoroughly and completely as required by GO 128. AT&T has stated that it inspects its underground facilities and that its procedures and practices are consistent across the telecommunications industry and with the requirements of GO 128.

2. GO 95, Rule 18-B, Maintenance Programs states in part:

> *"Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.*
>
> *The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities."*
>
> *(1) "Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.*
>
> *a. The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:*
>
> *i. Level 1 -- An immediate risk of high potential impact to safety or reliability:*
>
> - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
>
> *ii. Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
>
> - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

iii. Level 3 -- Any risk of low potential impact to safety or reliability:
- *Take corrective action within 60 months subject to the exception specified below."*

ESRB's review of AT&T's Monterey and San Benito County Region work orders from January 2020 to December 2024 found that AT&T completed a total of 1,298 work orders late or are late pending. Late pending work orders are work orders that had due dates prior to February 5, 2025, when ESRB received the work order data, but were not complete by that date. Due dates were determined by using either the due dates provided by AT&T in its data request responses, by applying GO 95, Rule 18-B, or by using the maintenance intervals provided by AT&T in its Overhead Lines Maintenance Plan, whichever provides the earlier due date. Table 1 breaks down the late work orders for the Monterey and San Benito County Region.

Table 1. Monterey and San Benito County Region Late Closed Work Orders

Hazard Level	Complete	Pending	Total
1	40	0	40
2	542	288	830
2a	18	49	67
2b	55	186	241
2c	2	14	16
3	6	84	90
NA	12	2	14
Total	**675**	**623**	**1298**

Table 2 lists the latest closed and most past due pending work orders.

Table 2. Monterey and San Benito County Region Most Past Due Work Orders

Package ID	Hazard Level	Create Date	Due Date	Closed Date	Days Late[1]	Status
917507	1	2021-09-20	2021-09-23	2022-05-24	243	Complete
540565	2	2020-01-01	2022-10-31	None	828	Open
788227	2a	2021-02-27	2021-11-22	None	1171	Open
540018	2b	2020-01-01	2020-10-31	None	1558	Open

[1] For open work orders, the number of days is counted from February 5, 2025.

788378	2c	2021-02-27	2021-11-24	None	1169	Open
540124	3	2020-01-01	2024-10-31	None	97	Open

III. Field Inspection

During the field audit, ESRB inspected the following facilities:

Table 3. Locations Inspected

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
1	Wood Pole	-121.65301393, 36.66339034
2	Wood Pole	-121.65375813, 36.66349418
3	Wood Pole	-121.65402302, 36.66360196
4	Wood Pole	-121.6525219, 36.66323763
5	Wood Pole	-121.67223783, 36.67948574
6	Wood Pole	-121.67179688, 36.67930162
7	Wood Pole	-121.67154786, 36.67900288
8	Wood Pole	-121.67129254, 36.67858668
9	Wood Pole	-121.67099576, 36.67820483
10	Wood Pole	-121.67101798, 36.67789691
11	Wood Pole	-121.60911519, 36.68326148
12	Wood Pole	-121.60885907, 36.68350275
13	Wood Pole	-121.60823349, 36.68384989
14	Wood Pole	-121.60769438, 36.68411783
15	Wood Pole	-121.60750817, 36.68417724
16	Wood Pole	-121.60736575, 36.68432573
17	Wood Pole	-121.60970417, 36.68389188
18	Wood Pole	-121.60959062, 36.68395963
19	Wood Pole	-121.02928868, 35.90801969
20	Wood Pole	-121.02841827, 35.90801587
21	Wood Pole	-121.02759661, 35.90803075
22	Wood Pole	-121.02675558, 35.90801095
23	Wood Pole	-121.02594845, 35.90801059
24	Wood Pole	-121.02915762, 35.90787683
25	Wood Pole	-121.02905326, 35.90822753
26	Wood Pole	-121.03031018, 35.90805962
27	Wood Pole	-121.03128566, 35.90804916
28	Wood Pole	-121.07202984, 35.99448368
29	Wood Pole	-121.07182553, 35.99546369

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
30	Wood Pole	-121.07102583, 35.99638571
31	Wood Pole	-121.0729179, 35.99332026
32	Wood Pole	-121.07346394, 35.99275177
33	Wood Pole	-121.17947859, 36.07349797
34	Wood Pole	-121.18111336, 36.07176513
35	Wood Pole	-121.18183855, 36.07114366
36	Wood Pole	-121.13048462, 36.21335147
37	Wood Pole	-121.13075305, 36.21366905
38	Wood Pole	-121.13098917, 36.21396694
39	Wood Pole	-121.13113251, 36.21418733
40	Wood Pole	-121.13020123, 36.21304445
41	Wood Pole	-121.12996343, 36.21275619
42	Wood Pole	-121.12974981, 36.21247882
43	Wood Pole	-121.30305136, 36.28071415
44	Wood Pole	-121.30310619, 36.28046022
45	Wood Pole	-121.30324021, 36.28008883
46	Wood Pole	-121.30276317, 36.28067421
47	Wood Pole	-121.3022408, 36.28077674
48	Wood Pole	-121.30193346, 36.28093613
49	Wood Pole	-121.30147719, 36.28128764
50	Vault	-121.32071862, 36.43777654
51	Junction box	-121.32067844, 36.43739615
52	Vault	-121.3207162, 36.43688049
53	Vault	-121.32078311, 36.43623475
54	Vault	-121.32073481, 36.43562473
55	Vault	-121.31980147, 36.43560781
56	Vault	-121.31985766, 36.43650792
57	Vault	-121.31982014, 36.43746657
58	Wood Pole	-121.44034755, 36.50575779
59	Wood Pole	-121.44010819, 36.50595714
60	Wood Pole	-121.43964838, 36.50630903
61	Wood Pole	-121.44075286, 36.50544409
62	Wood Pole	-121.4411514, 36.50509165
63	Wood Pole	-121.44081761, 36.5048384

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
64	Wood Pole	-121.44047841, 36.50452625
65	Wood Pole	-121.44014132, 36.50431525
66	Wood Pole	-121.43984522, 36.50405758
67	Wood Pole	-121.43956238, 36.50378732
68	Wood Pole	-121.76192324, 36.22539353
69	Wood Pole	-121.76242378, 36.22551408
70	Wood Pole	-121.76256215, 36.22567734
71	Wood Pole	-121.76231612, 36.22582461
72	Wood Pole	-121.7656037, 36.23143803
73	Wood Pole	-121.76489993, 36.2304645
74	Wood Pole	-121.76458385, 36.22969073
75	Wood Pole	-121.78846113, 36.25664877
76	Wood Pole	-121.78847376, 36.25763956
77	Wood Pole	-121.78849861, 36.25575185
78	Wood Pole	-121.78829051, 36.25539982
79	Wood Pole	-121.78808193, 36.25487589
80	Wood Pole	-121.82597037, 36.27654502
81	Wood Pole	-121.82550175, 36.27626194
82	Wood Pole	-121.82513248, 36.27604002
83	Wood Pole	-121.82465021, 36.27580683
84	Wood Pole	-121.82428595, 36.2756314
85	Wood Pole	-121.92650571, 36.4499234
86	Wood Pole	-121.92645404, 36.45028211
87	Wood Pole	-121.92394556, 36.45460046
88	Wood Pole	-121.92399331, 36.45426036
89	Wood Pole	-121.92412787, 36.45370423
90	Wood Pole	-121.92434875, 36.4535045
91	Wood Pole	-121.9397706, 36.48617972
92	Wood Pole	-121.93985606, 36.4857754
93	Wood Pole	-121.93992879, 36.48519258
94	Wood Pole	-121.9398114, 36.48418732
95	Wood Pole	-121.93957608, 36.48656414
96	Wood Pole	-121.93976348, 36.48710238
97	Wood Pole.	-121.93992625, 36.48751462

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
98	Wood Pole	-121.92670953, 36.54893792
99	Wood Pole	-121.92695756, 36.54890166
100	Wood Pole	-121.92689727, 36.54933672
101	Wood Pole	-121.92693451, 36.54977867
102	Wood Pole	-121.92684046, 36.55011008
103	Wood Pole	-121.92655067, 36.55004753
104	Wood Pole	-121.92607551, 36.55008999
105	Wood Pole	-121.92605721, 36.54976258
106	Wood Pole	-121.92617925, 36.54935108
107	Wood Pole	-121.89879104, 36.55014485
108	Wood Pole	-121.8988164, 36.55009517
109	Wood Pole	-121.89836419, 36.54974805
110	Wood Pole	-121.89781386, 36.54947016
111	Wood Pole	-121.94019482, 36.60313654
112	Wood Pole	-121.94066313, 36.6030333
113	Wood Pole	-121.94109818, 36.6033542
114	Wood Pole	-121.94056499, 36.60353034
115	Wood Pole	-121.93996087, 36.60375612
116	Wood Pole	-121.93970795, 36.60340469
117	Wood Pole	-121.90015598, 36.6001002
118	Wood Pole	-121.89998787, 36.60049225
119	Wood Pole	-121.89985132, 36.60090306
120	Wood Pole	-121.89977449, 36.60128076
121	Wood Pole	-121.89941837, 36.6010896
122	Wood Pole	-121.40680968, 36.845397
123	Wood Pole	-121.40681745, 36.84565536
124	Wood Pole	-121.40678962, 36.84593962
125	Wood Pole	-121.40681934, 36.84626251
126	Wood Pole	-121.40674767, 36.84657268
127	Wood Pole	-121.40678044, 36.84697797
128	Wood Pole	-121.40768011, 36.82424676
129	Wood Pole	-121.40674104, 36.82403486
130	Wood Pole	-121.40720181, 36.82378415
131	Wood Pole	-121.40726656, 36.82372349

Location #	Structure Type	GPS Coordinates (Longitude, Latitude)
132	Wood Pole	-121.40800112, 36.82336968
133	Wood Pole	-121.40831433, 36.82312091
134	Vault	-121.37619684, 36.83627217
135	Vault	-121.37566344, 36.83626532
136	Vault	-121.37528515, 36.83636575
137	Vault	-121.37457309, 36.83618216
138	Vault	-121.37431464, 36.83624149
139	Vault	-121.3737783, 36.83616593
140	Vault	-121.3738383, 36.8368946
141	Vault	-121.37384626, 36.83711406
142	Vault	-121.37430845, 36.83690043
143	Vault	-121.37482312, 36.83692777

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 4:

Table 4: GO 95, Rule 31.1 Findings

Location	Findings
5	Cable hanging from span.
6	Loose wire hanging from span.
14	Lines hanging outside of equipment box.
17	Hanging service drop at attachment to building.
34	Splice hanging freely.
43	Buddy poles carrying AT&T equipment.
68	Rope being used to hold cable to fire-wrapped pole.
74	Loose hanging cable.
74	Lashing wire getting undone.
74	Need to transfer assets to new pole.
106	Conductor sheathe is falling off.
108	Broken box on pole.
110	Excess hanging service drop.
114	Wire hanging from box.

2. **GO 95, Rule 31.6, Abandoned Lines** states:

"Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use."

ESRB's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 31.6 Findings

Location	Findings
9	Abandoned line wrapped around pole
18	Hanging abandoned riser.
39	Cable hanging from span and coiled cable on pole.
71	Abandoned service drop.
88	Service drop lashed to post.
96	Abandoned drop cut on both ends and fixed to pole.
113	Loose line hanging on pole down to 10 feet above ground.

3. **GO 95, Rule 37, Minimum Clearance of Wires above Railroads, Thoroughfares, Buildings, Etc.** states in part:

"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 6:

Table 6: GO 95, Rule 37 Findings

Location	Findings
73	Low clearance.
74	Low drop clearance.

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

"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.

Table 2, Case 3C: The clearance between wires, cables and conductors not supported on the same poles, vertically at crossings in spans and radially where colinear or approaching crossings for communication conductors (including open wire, cables and service drops) must be at least 24 inches.

Table 2, Case 8C: Vertical separation between conductors and/or cables, on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole and in adjoining midspans for communication conductors (including open wire, cables and service drops) must be at least 12 inches.

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

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

Table 7: GO 95, Rule 38 Findings

Location	Findings
4	Comcast lines contacting AT&T line.
7	Contact with a deflected cable line
12	AT&T line hanging on cable lines.
13	AT&T line looped around cable line.
14	Multiple AT&T lines crossing through cable line.
18	AT&T lines contacting cables lines.
105	Cable and AT&T drops contacting.
110	Contact between AT&T and cable lines.
112	Cable and AT&T lines in contact.
117	Comcast lines touching AT&T lines.
122	AT&T line touching cable lines.
127	AT&T service drop contacting cable lines.

5. **GO 95, Rule 44.3, Replacement** states in part:

"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."

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

Table 8: GO 95, Rule 44.3 Findings

Location	Findings
46	Broken lashing wire.
90	Broken lashing wire.
113	Broken lashing wire.

6. **GO 95, Rule 84.6-B, Ground Wires** states in part:

"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
19	Ground wire needs cover.
42	Exposed ground wire at base of pole.
77	Exposed ground wire needs cover.
120	Broken ground wire moulding.

7. **GO 95, Rule 84.6-D, Vertical Runs** states:

"Vertical runs of communication wires or cables supported on the surface of wood poles or structures, shall be covered by a suitable protective covering (see Rule 22.8) where within a vertical distance of 3 feet above or 6 feet below unprotected supply conductors supported on the same pole or structure. Vertical runs of communication wires or cables on the surface of a wood pole shall be covered by a suitable protective covering where within a 6 foot radius of any other pole supporting supply conductors except that those portions of such runs which are more than 3 feet above or 6 feet below the level of unprotected supply conductors need not be covered. Cable and drop wire runs to or from terminal boxes are exempted from these requirements for covering, under the following conditions:

Where guard arms are installed above messengers or longitudinal cables which are less than 6 feet below but not less than 4 feet below unprotected supply conductors of 0 - 750 volts, or where cables are supported on crossarms at not less than 15 inches from center line of pole, in which cases any portion of metal sheathed cable runs on the surface of pole below the guard arm and in the same quadrant as the longitudinal cable (see Appendix G, Figure 87), or below and on the same side of the pole with a crossarm which supports a longitudinal cable, need not be covered.

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.

Vertical runs shall be treated as risers (see Rule 87.7–D) where within a distance of 8 feet from the ground line.

Runs which terminate in the top of enclosures which afford ample mechanical protection to the runs may extend within 8 feet of the ground but not less than 6 feet of the ground without being treated as risers."

ESRB's findings related to the above rule are listed in Table 10:

Table 11: GO 95, Rule 84.6-D Findings

Location	Findings
5	Loose riser not secured appropriately.
92	Riser not appropriately attached to pole.
118	Loose wire not appropriately attached to pole.

8. **GO 95, Rule 84.6-F, Protective Covering** states in part:

"Protective covering shall be Attached to poles, crossarms and structures by means of corrosion–resistant straps, lags or staples which are adequate to maintain such covering in a fixed position.

Where such covering consists of hardwood or rigid plastic moulding, the distance between straps, lags or staples shall not exceed three feet on each side and due care shall be exercised to avoid the possibility of nails protruding through any inner surface.

When U–shaped moulding is utilized appropriate gaps between sections shall be provided to permit expansion due to temperature variations and such gaps shall be covered by corrosion resistant straps to prevent contact with conductors covered by moulding."

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

Table 12: GO 95, Rule 84.6-F Findings

Location	Findings
119	Riser cover needs to be reattached.
120	Riser cover need to be reattached.
128	Cover needs to be resecured.

9. GO 95, Rule 84.7-A, 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 and87.4–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 13:

Table 13: GO 95, Rule 84.7-A Findings

Location	Findings
84	Climb space around pole hindered by vegetation.

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

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

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

Guys shall be attached to structures as nearly as practicable at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."

ESRB's findings related to the above rule are listed in Table 14:

Table 14: GO 95, Rule 86.2 Findings

Location	Findings
27	Loose down guy.
41	Slack down guy.
74	Slack down guy.
107	Slack down guy.

11. GO 95, Rule 87.7-D.1, Covered from Ground Level to 8 Feet above the Ground states in part:

"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 15:

Table 15: GO 95, Rule 87.7-D.1 Findings

Location	Findings
43	Exposed risers at less than 8 feet.
70	Riser exposed and needs cover.
91	Risers need cover.
93	AT&T riser needs cover to 8 feet.

Location	Findings
94	Riser needs cover.
95	Riser needs cover at ground level.
96	Risers need cover.
97	Risers either abandoned or need cover.
98	Riser exposed below 8 feet.
100	Riser needs cover.
101	Riser needs cover.
102	Risers need to be covered.
103	Riser needs cover.
105	Riser needs cover.
106	Riser needs cover.
108	Riser needs cover.
115	Risers need cover.

12. **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 16:

Table 16: GO 128, Rule 17.1 Findings

Location	Findings
53	Not able to open vault.

Location	Findings
139	Vault not able to be opened.
140	Vault lid hook and lid broken.

V. Observations

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

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

   GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

   "(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.
   (4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95."

   During the field inspection, ESRB noted the third-party safety concerns listed in Table 17:

Table 17: Third-Party Observations

Location	Third-Party	Observations
2	Comcast	Exposed riser below 8-foot height.
5	Cable Company	Exposed cable riser at ground level.

Location	Third-Party	Observations
7	Comcast	Wire deflected by tree limb.
8	Cable Company	Hanging cable touching AT&T line.
38	Cable Company	Abandoned cable line.
38	Cable Company	Riser without cover.
40	Pacific Gas and Electric	Loose and exposed ground wire above 8 feet.
84	Pacific Gas and Electric	Vegetation touching down guy above insulator.
92	Cable Company	Coaxial cable abandoned.
93	Comcast	Service drop laying on the ground.
94	Comcast	Abandoned line.
95	Cable Company	Riser needs a cover.
96	Cable Company	Riser needs a cover.
97	Cable Company	Abandoned line and an uncovered riser.
98	Cable Company	Riser exposed below 8 feet.
100	Cable Company	Riser needs cover.
101	Cable Company	Riser needs cover.
102	Cable Company	Risers need to be covered.
103	Cable Company	Riser needs cover.
104	Comcast	Cable equipment contacting AT&T lines.
107	Pacific Gas and Electric	Slack down guys.
112	Cable Company	Risers not appropriately attached to pole.
112	Cable Company	Slack down guy.
129	Cable Company	Service drop not appropriately secured to pole.