

PUBLIC UTILITIES COMMISSION

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October 15, 2025

CA2025-1398

Saira Pasha
Area Manager - Regulatory
AT&T Services, Inc. (AT&T)
430 Bush St, 5th Floor
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T's Humboldt Service Area

Ms. Pasha:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Javier Reyes of ESRB conducted a CIP audit of AT&T's Humboldt Service Area from July 14-18, 2025. During the audit, ESRB staff conducted field inspections of AT&T's communications facilities and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than **November 14, 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 Brandon Vazquez at (628) 249-2867 or Brandon.Vazquez@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 Report for AT&T Humboldt

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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Ross Johnson, Regulatory Relations, AT&T
Josh Mathisen, Regulatory Relations, AT&T

**CPUC AUDIT FINDINGS
AT&T HUMBOLDT SERVICE AREA
JULY 14-18, 2025**

I. Records Review

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

- AT&T's facilities statistics.
- AT&T's Service Area Map.
- AT&T's Overhead General Order (GO) 95 Inspection and Maintenance Plan.
- AT&T's Inspector Training Program.
- Overhead GO 95 Patrol and Detailed-Inspection records for the last five years (May 2020-May 2025).
- Work order records for the last five years (May 2020-May 2025).
- Third Party Safety Hazard notifications for the last five years (May 2020-May 2025).
- Pole loading and safety factor calculations completed in the last twelve months (May 2024-May 2025).
- Intrusive pole tests completed in the last three years (May 2022-May 2025).
- New construction projects completed in the last twelve months (May 2024-May 2025).

II. Records Violations

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

1. GO 95, Rule 18-B1(a), Maintenance Programs states in part:

"The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

- (i) *Level 1 -- An immediate risk of high potential impact to safety or reliability:*
 - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
- (ii) *Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
 - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential*

violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:

- Take corrective action within 60 months subject to the exception specified below.”*

**AT&T’s Overhead Lines Maintenance Plan, Version 5.5, Effective 8/30/2024,
Section 3, Classification of Nonconformance states:**

“3.1. The Levels of Nonconformance described below are based upon General Order 95, Rule 18; and the assumed risk and exposure of nonconformance conditions identified with aerial facilities.

*3.1.1. **Level 1** nonconformances pose an immediate risk of high potential impact to safety or reliability. **Within 72 hours**, Level 1 nonconformances shall be corrected or temporarily remediated and reclassified to a lower priority.*

*3.1.2. **Level 2** nonconformances pose any other risk of at least moderate potential impact to safety or reliability. Corrective action for Level 2 nonconformances shall be based on individual circumstances and exceptions noted below, but **not to exceed 36 months**.*

*3.1.3. **Level 2a** nonconformances are those Level 2 nonconformances that may compromise worker safety. Level 2a nonconformances must be corrected or temporarily remediated and reclassified to a lower priority in **no more than 12 months**.*

*3.1.4. **Level 2b** nonconformances are those Level 2 nonconformances that may create a fire risk. Level 2b nonconformances must be corrected or temporarily remediated and reclassified to a lower priority in **no more than 12 months if in Fire Map Tier 2 or no more than 6 months if in Fire Map Tier 3, or 36 months in Fire Map Tier 1**.*

*3.1.5. **Level 2c** nonconformances are those Level 2 nonconformances that may create a fire risk and may affect worker safety. Level 2c nonconformances must be corrected or temporarily remediated and reclassified to a lower priority in **no more than 12 months in Tier 1 and 2 of the High-Fire Threat District and 6 months for Tier 3 of the High-Fire Threat District**.*

*3.1.6. **Level 3** nonconformances pose a risk of low potential impact to safety or reliability. Level 3 nonconformances must be corrected within **60 months**.”*

ESRB’s review of AT&T’s overhead (OH) work orders from May 2020 through May 2025 found that AT&T had 91 late work orders out of 628 total work orders (14.5% late).¹ Out of the 91 late work orders, there were 86 late-open, two (2) late-closed, and three (3) late-canceled. Late-open work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 91 late work orders by hazard level and type.

¹ Attachment 1 – Late Work Orders.

Table 1: Late Work Orders

Hazard Levels	Late-Open Work Orders	Late-Closed Work Orders	Late-Canceled Work Orders
1	0	1	0
2	26	0	0
2a	32	0	0
2b	22	0	3
2c	6	1	0
3	0	0	0
Total	86	2	3

Table 2 below lists the most late work orders by hazard level.

Table 2: Most Late Work Orders

Hazard Level	Work Order #	Days Late
1	1571000	102
2b	774653	1,332
3	n/a	n/a

Work Order # 1571000 was identified on 10/21/2024 as a Priority 1 for a hazardous tree causing significant strain to an AT&T cable and pole lean with a Required Due Date of 10/24/2024. AT&T did not close the work order until 2/3/2025, 102 days after the Due Date.

Work Order # 774653 was identified on 10/19/2020 as a Priority 2b to replace a damaged down guy in a Tier 2 High Fire-Threat District (HFTD), with a Required Due Date of 10/19/2021. AT&T has not yet closed the work order as of its 6/12/2025 Pre-Audit Data Request (PADR) Response, 1,332 days after the Due Date.

2. 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 review of AT&T’s underground (UG) work orders from May 2020 through May 2025 found that AT&T had one (1) late-closed work order out of 13 total work orders (8% late). There were no late-open or late-canceled work orders. See Table 3 below for additional information on the late-closed work order.

Table 3: Late UG Work Order

PACKAGE ID	Identification Date	DUE DATE	COMP DATE	DAYS LATE	SERVICE PRIORITY	DESCRIPTION	LAT_LONG	Priority Level
704890	10/5/2020	10/6/2021	1/3/2022	89	Service Affecting - POTS	MARKIT Rebuild and recast underground cable splice. 100 pr and terminal tail	40.934236, -124.103996	na

3. 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”*

AT&T Procedure – Visual Inspections of Overhead Lines, G.O. 95 Rule 80.1A, Section 4.1.4, Table 1 – Inspection Levels and Intervals (Effective 4/21/25)² states:

Fire-Threat Tier	Patrol Interval (years)	Detail Interval (years)
Non HFTD	So Cal 15 Nor Cal 20	NONE
2	2	10
3	1	5

During the field audit, ESRB inspected 45 non-HFTD locations with AT&T’s overhead facilities. Of these 45 locations, 14 had associated GO 95 violations (31%). AT&T’s *Visual Inspections of Overhead Lines* procedure requires patrols for all OH communication lines in Northern California every 20 years. However, GO 95, Rule 31.2 requires the **frequent** and **thorough** inspection of OH communication lines to ensure

² AT&T PADR Response, Question 4 (Dated: 6/12/2025).

they are in good condition [*emphasis added*]. Additionally, patrols by definition do not constitute a thorough inspection.³ ESRB's finding rate of 31% in non-HFTD areas where AT&T patrols every 20 years indicates that AT&T's current inspection program for its non-HFTD areas is insufficient for complying with GO 95, Rules 31.2 and 80.1-A(2).

4. GO 128, Rule 12.2, Maintenance states:

“Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.”

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.”

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.”

ESRB noted that AT&T could not provide any UG patrol or inspection records in the last five years (May 2020 through May 2025). In response to the San Joaquin, Stanislaus, and Calaveras County Group audit in March 2025, AT&T stated that “employees regularly inspect underground systems and facilities during work to ensure they are well-maintained and meet GO 128 standards.”⁴ ESRB disagrees that only conducting inspections of facilities that undergo construction/maintenance work constitutes a frequent and thorough inspection program. ESRB asserts that having a documented inspection procedure, defined inspection intervals, and retaining inspection records is acceptable good practice. AT&T lacks sufficient evidence to demonstrate it maintains and inspects its UG equipment in accordance with GO 128, Rules 12.2, 17.1, and 17.2.

³ Patrol Inspections – a simple visual inspection of applicable communications facilities equipment and structures that is designed to identify obvious structural problems and hazards [as defined by GO 95, Rule 80.1-A(3)].

⁴ AT&T Response to CA2025-1251 San Joaquin, Stanislaus, and Calaveras County Group Audit Report (Dated: June 20, 2025).

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Structure ID	Structure Type	GPS Coordinates
1	6	Joint Wood Pole	40.804573, -124.157722
2	121543767	Joint Wood Pole	40.804476, -124.157704
3	121828863	Joint Wood Pole	40.799887, -124.1462
4	121828836	Joint Wood Pole	40.799385, -124.146853
5	121468841	Joint Wood Pole	40.800687, -124.147461
6	6	Comms-Only Wood Pole	40.912069, -123.810343
7	5	Comms-Only Wood Pole	40.911349, -123.810921
8	4	Comms-Only Wood Pole	40.910792, -123.811384
9	3	Comms-Only Wood Pole	40.910604, -123.812104
10	2	Comms-Only Wood Pole	40.910269, -123.812231
11		Comms-Only Wood Pole	40.909775, -123.812307
12		Joint Wood Pole	40.923475, -123.837774
13	81	Comms-Only Wood Pole	40.919991, -123.862809
14	81-G	Comms-Only Wood Pole	40.920003, -123.86293
15	82	Comms-Only Wood Pole	40.920679, -123.862472
16	83	Comms-Only Wood Pole	40.921402, -123.862258
17	84	Comms-Only Wood Pole	40.921995, -123.862444
18	121472580	Joint Wood Pole	40.878231, -123.97963
19	121472579	Joint Wood Pole	40.878748, -123.97967
20	120010738	Joint Wood Pole	40.879259, -123.979918
21	46000	Comms-Only Wood Pole	40.878924, -123.979607
22	5405	Joint Wood Pole	40.870675, -123.962143
23		Comms-Only Wood Pole	40.870506, -123.961741
24		Comms-Only Wood Pole	40.870637, -123.962069
25	1475	Vault	40.93426, -124.103972
26	1445	Vault	40.934257, -124.104729
27	120059794	Joint Wood Pole	40.932679, -124.112385
28	120008631	Joint Wood Pole	40.93317, -124.112388
29	110310331	Joint Wood Pole	40.933475, -124.112405
30	121616628	Joint Wood Pole	40.902203, -124.105885
31	110485926	Joint Wood Pole	40.901821, -124.105851

32	P1735	Comms-Only Wood Pole	40.879444, -124.101155
33	04800	Comms-Only Wood Pole	40.879451, -124.101382
34		Comms-Only Wood Pole	40.879446, -124.102304
35	120597724	Joint Wood Pole	40.478677, -123.779331
36	120597717	Joint Wood Pole	40.478796, -123.779888
37	121466733	Joint Wood Pole	40.478694, -123.778884
38		Comms-Only Wood Pole	40.472539, -123.793208
39	3795	Joint Wood Pole	40.472461, -123.793075
40		Comms-Only Wood Pole	40.47218, -123.793459
41	8	Comms-Only Wood Pole	40.4721, -123.793685
42	7	Comms-Only Wood Pole	40.471459, -123.794212
43	6	Comms-Only Wood Pole	40.471108, -123.794656
44	5	Comms-Only Wood Pole	40.470235, -123.794928
45	6	Comms-Only Wood Pole	40.437001, -123.767678
46	493	Comms-Only Wood Pole	40.472704, -123.868987
47	494	Comms-Only Wood Pole	40.472562, -123.868034
48		Joint Wood Pole	40.472392, -123.867281
49	497	Comms-Only Wood Pole	40.472045, -123.866467
50		Comms-Only Wood Pole	40.488796, -123.970042
51	2	Comms-Only Wood Pole	40.488801, -123.96905
52	4	Comms-Only Wood Pole	40.488573, -123.971053
53	121563683	Joint Wood Pole	40.544338, -124.111644
54	121199313	Joint Wood Pole	40.543651, -124.111593
55	121295275	Joint Wood Pole	40.543104, -124.11158
56	1856	Joint Wood Pole	40.58705, -124.118741
57	1856B2	Joint Wood Pole	40.587308, -124.118728
58	1730	Joint Wood Pole	40.587026, -124.119786
59	120431086	Joint Wood Pole	40.597991, -124.149871
60	1642	Joint Wood Pole	40.597861, -124.149157
61	5	Comms-Only Wood Pole	40.235818, -123.821841
62	121553249	Joint Wood Pole	40.23571, -123.820928
63	121553202	Joint Wood Pole	40.235815, -123.82063
64		Comms-Only Wood Pole	40.235885, -123.820616
65	P8	Joint Wood Pole	40.235848, -123.8194
66	175884	Joint Wood Pole	40.235814, -123.818588
67	9-5	Comms-Only Wood Pole	40.230637, -123.826979

68	121650258	Joint Wood Pole	40.230683, -123.826826
69	121633405	Joint Wood Pole	40.324821, -123.924376
70	121633401	Joint Wood Pole	40.324651, -123.924138
71		Joint Wood Pole	40.325203, -123.924499
72	121204161	Joint Wood Pole	40.325735, -123.924448
73	121633404	Joint Wood Pole	40.325729, -123.924147
74	121553267	Joint Wood Pole	40.443084, -124.016056
75	121553268	Joint Wood Pole	40.442892, -124.017452
76	120119880	Joint Wood Pole	40.442519, -124.018555
77	120008091	Joint Wood Pole	40.483806, -124.100046
78	120008098	Joint Wood Pole	40.483615, -124.099901
79	110325803	Joint Wood Pole	40.483813, -124.099843
80	120009411	Joint Wood Pole	40.483589, -124.100547
81	120008099	Joint Wood Pole	40.483969, -124.100775
82	120009422	Joint Wood Pole	40.483786, -124.101195
83		Padmount Communications	40.501377, -124.101679
84		Padmount Communications	40.501618, -124.101666
85	120125755	Joint Wood Pole	40.501965, -124.101556
86	121534609	Joint Wood Pole	40.501981, -124.101799
87	121466787	Joint Wood Pole	40.502102, -124.101815
88	121506029	Joint Wood Pole	40.502107, -124.102527
89	121466911	Joint Wood Pole	40.502125, -124.103278
90	121534602	Joint Wood Pole	40.502108, -124.103857

IV. Field Inspection Violations

ESRB observed 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.”

Location	Violation Description
2	AT&T needs to attach to new pole.
7	Tree causing strain to down guy.
8	AT&T line attached to pole with tape/string.
8	Broken lashing wire.
10	Damaged high-vis strip.
17	Damaged/loose high-vis strips.
18	Broken lashing wire. AT&T has an open work order # 1337683 to repair the lashing wire.
19	String-by service line loose/slacked needs to be lashed.
33	Missing high-vis strips.
37	Buddy pole.
41	Missing high-vis strips.
46	Broken lashing wire. AT&T has an open work order # 1347739 to repair the lashing wire.
47	Missing high-vis strips.
49	Missing high-vis strips.
50	Broken lashing wire. AT&T has an open work order # 991932 to repair the lashing wire.
51	Pole leaning about 7-8% and needs a guy wire.
61	Missing high-vis strips.
64	Missing high-vis strips.
68	Buddy pole. AT&T has an open work order # 775513 to transfer its facilities.

2. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 4 Column B states:

“The basic minimum allowable vertical clearance of a communication conductor and supply service drop above ground along thoroughfares in rural districts or

across other areas capable of being traversed by vehicles or agricultural equipment is 15 feet.”

Location	Violation Description
6	Low AT&T line along rural road, approximately 7-8 feet groundline clearance.
45	Downed AT&T line along rural road.

3. 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.”

Location	Violation Description
6	Broken down guy.
35	Slack down guy.
45	Slack down guy.
53	Broken down guy. AT&T has an open work order # 1541409 to replace the guy.

4. GO 95, Rule 35, Vegetation Management states in part:

“When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule.”

Location	Violation Description
23	Fallen tree limb on AT&T line. AT&T has an open work order # 1337657 to trim the limb.
41	AT&T line has vegetation strain/abrasion.
73	AT&T line has vegetation strain/abrasion.

5. GO 95, Rule 44.3, Replacement states:

“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.”

Location	Violation Description
10	Pole missing large chunk of wood at high-vis strip.
47	Pole missing chunk of wood near base.
50	Crossarm split in half.
52	Pole damaged and split at base due to car collision.
64	Pole has woodpecker hole and deterioration at the top. AT&T needs to assess the pole.

6. 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.”

Location	Violation Description
20	String-by service drop runs down pole without riser cover.
30	Service riser not properly secured and missing cover.
61	Riser not covered up to 8 feet.

7. 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.”

Location	Violation Description
27	AT&T idle line wrapped around pole and another idle service hanging low at midspan. AT&T has an open work order # 1637198 to remove the lines.

8. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 5 Column B states in part:

“The basic minimum allowable vertical clearance of a communication conductor and supply service drop in an above ground area accessible to pedestrians only is 10 feet [...]

Exception (Rule 84.4-A(3)) Accessible to Pedestrians Only: *Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet.”*

Location	Violation Description
27	AT&T low service drop in front yard, approximately 6.5 feet groundline clearance.

9. GO 95, Rule 86.9, Guy Marker (Guy Guard) states:

“A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.”

Location	Violation Description
46	Damaged guy guard. AT&T has an open work order # 1348020 to replace the guy guard.
59	Down guy missing guy guard.

10. GO 95, Rule 86.6-B(2), Sectionalized Because of Exposure or Proximity to Supply Conductors, 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)."

Location	Violation Description
59	Down guy less than 4 feet from secondary conductors is missing a guy bob.

11. GO 95, Rule 91.3-C, Stepping states in part:

"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain."

Location	Violation Description
61	Low pole step.

12. 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)."

Location	Violation Description
63	Ground wire exposed and missing ground molding. AT&T has an open work order # 991601 to install ground molding.
69	Ground wire exposed.

13. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 8 Column C states:

“The basic minimum allowable 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 is 12 inches.”

Location	Violation Description
77	Low clearance between AT&T and Cable TV service drops. AT&T has an open work order # 1337756 to address the clearance infraction.

14. GO 95, Rule 92.4-C2(c), Ground Rods (Ground Electrodes) states:

“Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground.”

Location	Violation Description
77	Exposed and abandoned ground rod.

15. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

“Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.”

Location	Violation Description
84	Pedestal missing ownership sign. AT&T added new signage during the audit.

V. Field Observations

ESRB staff observed the following third-party potential safety concerns during the field inspection. AT&T must issue third-party notifications to the respective utilities for these findings.

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 GO95.

Note: Each pole owner must be able to determine all other pole owners on poles it owns. Each pole owner must be able to determine all authorized entities that attach equipment on its portion of a pole.”

Location	Violation Description
2	Cable TV needs to attach to new pole.
3	PG&E span guy contacting metal crossarm brace/bracket.
5	Cable TV amplifier box is open.
5	Cable TV line contacting AT&T line due to Cable TV slack.
21	Cable TV idle line wrapped around pole.
27	Multiple idle Cable TV lines hanging down pole and one attached to primary guy.
55	PG&E down guy slack.
56	PG&E pole leaning over 10%.
57	Dirty/corroded PG&E primary insulators.
58	Cable TV line contacting PG&E secondary guy.
62	PG&E pole has 3 large woodpecker holes and a split near the comms level.
63	PG&E pole has significant amount of termite holes and deterioration.
63	PG&E ground wire exposed.
63	Abandoned PG&E anchor point needs to be removed.
66	PG&E pole has 2 woodpecker holes that need assessment.
75	PG&E pole has 2 woodpecker holes, needs assessment.
78	PG&E pole is deteriorated and has large vertical cracks. AT&T has an open third-party notification # 1337677 for PG&E to inspect the pole.
86	Cable TV riser missing cover.
88	Broken PG&E guy hanging down pole.