LAW OFFICES OF LEON M. BLOOMFIELD
1970 Broadway, SUITE 1100
OAKLAND, CALIFORNIA 94612
DIRECT: 510.282.62404
EMAIL: lmb@wblaw.net

March 13, 2026

VIA E-MAIL

Majed Ibrahim, P.E.
Program and Project Supervisor, Electric Safety and Reliability
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Re: Response to Audit Report for T-Mobile's Orange County Facilities

Dear Mr. Ibrahim:

On behalf of T-Mobile West LLC dba T-Mobile ("T-Mobile"), attached please find T-Mobile's response to the Electric Safety and Reliability Branch's (ESRB) Audit Report for Orange County dated February 12, 2026.

As always, please let me know if you have any questions regarding the attached.

Sincerely,

/s/

Leon M. Bloomfield

cc – via email w/ attachments:

Lee Palmer, Director, Safety and Enforcement Division ("SED")
Eric Wu, Program Manager, ESRB, SED
Norvik Ohanian, Utilities Engineer, Electric Safety and Reliability Branch, CPUC
Ricky Tse, CPUC
Bryan Pena, CPUC
Madonna Ebrahimof, CPUC
Ben Preach, T-Mobile
Stephen Kukta, T-Mobile

Response of T-Mobile West LLC dba T-Mobile to the Electric Safety and Reliability Branch's Audit Report dated February 12, 2026

I. Records Review

Finding 1.

GO 95, Rule 44.1 – Installation and Reconstruction, states in part:

> *Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*
>
> *The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.*

The pole loading calculations provided by T-Mobile communications for pole LA33268B did not include third-party communication conductors at approximately 22 feet high, which were present at the time of the field inspection. Additionally, the pole loading calculations did not include two 2-inch diameter risers, which were present at the time of the field inspection

Response to Finding 1.

T-Mobile's policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles in a manner consistent with the General Order. To that end and consistent with Rule 44.1 of GO 95, T-Mobile's general practice is to conduct – and maintain – pole loading calculations ("PLC") "upon installation or reconstruction". Although it is not clear what facilities were present at the site at the time the existing Pole Loading Calculation was performed, T-Mobile has already completed the new PLC to account for all the elements currently on the pole. *See* Attachment A.

II. Findings re Alleged Violations

Finding 1.

GO 95, Rule 18.A3 - Resolution of Potential Violation of General Order 95 and Safety Hazards, states in part:

> *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.*

T-Mobile did not notify the third-party entity of a safety hazard of facilities on the pole LA33268B, where third-party communication cables were not securely attached to the pole and were instead hanging from risers by chains.

Response to Finding 1.

Consistent with General Order 95, T-Mobile's general practice is to provide notification to electric utilities or other communications companies when – in the course of an inspection – it discovers what it believes to be a "Safety Hazard" on the other company's facilities. Safety Hazards are defined in the General Order as a "condition that poses a significant threat to human life or property."

Upon review of the site, T-Mobile does not necessarily believe that the determination noted above constitutes a Safety Hazard as that term is used in the General Order or as otherwise used by pole owners and attachers. Nonetheless, consistent with General Order 95, Rule 18.A(3), T-Mobile has provided notice to AT&T regarding the staff's Safety Hazard determination – as well as the site ID, pole ID, street address and lat/long - with respect to their respective facilities on the pole identified above.

Finding 2.

> ***GO 95, Rule 31.1 – Design, Construction, and Maintenance, states in part:*** *Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

The cover of access hatch at each of the following poles was missing:

- *Pole No. LA33441E*
- *Pole No. LA33867B*
- *Pole No. LA23192C*

The T-Mobile communications cables were not transferred to the new pole in place at each of the following poles:

- *Pole No. LA23198B*
- *Pole No. LA02803A*

Response to Finding 2.

T-Mobile's policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles and underground facilities in a manner consistent with the General Orders.[1] To that end, T-Mobile otherwise conducts regular inspections and remediates any issues discovered in the course of those inspections based on the appropriate priority level. Among other things, T-Mobile generally secures and, if necessary, replaces/repairs missing or damaged access covers as appropriate. T-Mobile, however, cannot control for normal wear and tear on a site, the actions of wildlife (*e.g.,* birds) and/or a number of factors that are outside its control (*e.g.,* vandalism, car accidents, actions of other providers on the pole).

Consistent with sound business practices and the General Order, T-Mobile further responds that new access hatch covers have been installed at the three poles identified above. *See* Attachment B (photos of each access hatch covers for the sites identified above).

As for the transfer of T-Mobile facilities and communication cables, those new poles were set by SCE. T-Mobile will be working with SCE (and the local jurisdiction if required) to complete the transfer of the cables. This work is characterized as Level 3 Priority. Accordingly, the work is expected to be completed within 60 months of the Audit – or by January 2031.

[1] T-Mobile notes that General Order 95 is applicable to overhead installations, not underground facilities.

Finding 3.

GO 128, Rule 17.1 – Design, Construction and Maintenance, states in part:

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.

The following facilities required maintenance:

- *IE82508A – The old meter pedestal was abandoned in place and not removed.*
- *LA33825A – The meter pedestal base was not securely fixed to its concrete foundation and was leaning.*

Response to Finding 3.

T-Mobile's policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles and underground facilities in a manner consistent with the General Orders. To that end, and among other things, it generally removes pedestals that are no longer in use and otherwise secures pedestals appropriately. It also otherwise conducts regular inspections and remediates any issues discovered in the course of those inspections based on the appropriate priority level. T-Mobile, however, cannot control for normal wear and tear on a site, the actions of wildlife (*e.g.,* birds) and/or a number of factors that are outside its control (*e.g.,* vandalism, car accidents, actions of other providers on the pole).

T-Mobile further notes that in the course of combining two sites, the old pedestal associated with IE82508A was inadvertently left on site. T-Mobile will be coordinating with local jurisdiction to obtain the necessary permits required to safely remove that pedestal. As for the pedestal base associated with LA33825A, T-Mobile notes that it will also be working with that local jurisdiction to obtain the necessary permits to repair that base. This work is characterized as Level 3 Priority. Accordingly, the work is expected to be completed within 60 months of the Audit – or by January 2031.

Finding 4.

> ***GO 128, Rule 42.7 – Covers, states in part:***
> *Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal.*

The cover of the handhole located at each of the following locations was not securely closed, allowing unauthorized access to the structures:

- LA03015F
- LA33867B
- LA33451B
- LA33445A
- LA23192C
- LA33493C
- LA02947A (2 handholes)

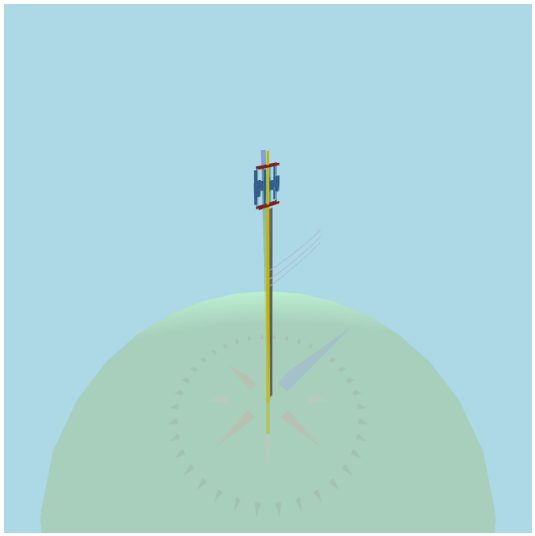
Response to Finding 4.

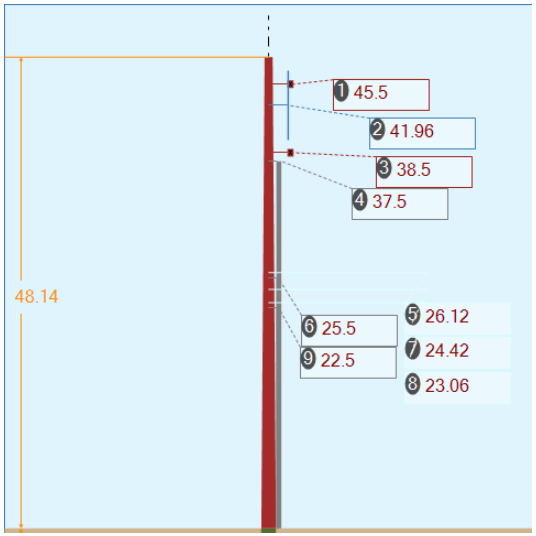
T-Mobile's policy and procedure is to design, construct, maintain and inspect its facilities on joint utility poles and underground facilities in a manner consistent with the General Orders. To that end, it otherwise conducts regular inspections and remediates any issues discovered in the course of those inspections based on the appropriate priority level, including but not limited to securing any handhole covers. T-Mobile, however, cannot control for normal wear and tear on a site, the actions of wildlife (*e.g.,* birds) and/or a number of factors that are outside its control (*e.g.,* vandalism, car accidents, actions of other providers on the pole).

T-Mobile further notes that the handhole covers identified have now all been secured. *See* Attachment C (photos of the secured handhole cover for each site identified above).

ATTACHMENT A

Pole Num:	**LA33268B_NT_001**	Pole Length / Class:	**55 / H2**	Code:	**GO 95**	Structure Type:	**Unguyed Tangent**
Aux Data 1	**Unset**	Species:	**DOUGLAS FIR**	GO 95 Rule:	**At Replace (Existing)**	Pole Strength Factor:	**0.38**
Aux Data 2	**Unset**	Setting Depth (ft):	**6.86**	Construction Grade:	**A**	Transverse Wind LF:	**1.00**
Aux Data 3	**Unset**	G/L Circumference (in):	**56.50**	Loading District:	**Light**	Wire Tension LF:	**1.00**
Aux Data 4	**Unset**	G/L Fiber Stress (psi):	**8,000**	Ice Thickness (in):	**0.00**	Vertical LF:	**1.00**
Aux Data 5	**Unset**	Allowable Stress (psi):	**2,968**	Wind Speed (mph):	**68.47**	Pole Factor of Safety:	**5.07**
Aux Data 6	**Unset**	Fiber Stress Ht. Reduc:	**No**	Wind Pressure (psf):	**12.00**	Vertical Factor of Safety:	**21.86**
Latitude:	**33.73719**	Longitude:	**-117.88136**	Elevation:	**35M**	Bending Factor of Safety:	**5.13**





Pole Capacity Utilization (%) **Crossarm allowance 300 lbs**		**Height (ft)**	**Wind Angle (deg)**
Maximum	**52.6**	0.0	271.2
Groundline	**52.6**	0.0	271.2
Vertical	**12.2**	29.8	271.2

Pole Moments (ft-lb) **Crossarm allowance 300 lbs**		**Load Angle (deg)**	**Wind Angle (deg)**
Max Cap Util	**73,379**	276.6	271.2
Groundline	**73,379**	276.6	271.2
GL Allowable	**141,270**		

Groundline Load Summary - Reporting Angle Mode: Load - Reporting Angle: 276.6°

	Shear Load* (lbs)	Applied Load (%)	Bending Moment (ft-lb)	Applied Moment (%)	Pole Capacity (%)	Bending Stress (+/- psi)	Vertical Load (lbs)	Vertical Stress (psi)	Total Stress (psi)	Pole Capacity (%)
Comms	98	4.2	**2,401**	3.3	**1.7**	**51**	7	0	**51**	**1.7**
GenericEquipments	546	23.2	**25,380**	34.6	**18.0**	**536**	1,086	4	**540**	**18.2**
Pole	667	28.4	**15,450**	21.1	**10.9**	**326**	3,142	12	**338**	**11.4**
Crossarms	302	12.8	**12,628**	17.2	**8.9**	**266**	384	2	**268**	**9.0**
Risers	735	31.3	**17,493**	23.8	**12.4**	**369**	160	1	**370**	**12.5**
Insulators	1	0.0	**26**	0.0	**0.0**	**1**	51	0	**1**	**0.0**
Pole Load	2,350	100.0	**73,379**	100.0	**51.9**	**1,548**	4,830	19	**1,567**	**52.8**
Pole Reserve Capacity			**67,891**		**48.1**	**1,420**			**1,401**	**47.2**

Load Summary by Owner - Reporting Angle Mode: Load - Reporting Angle: 276.6°

	Shear Load* (lbs)	Applied Load (%)	Bending Moment (ft-lb)	Applied Moment (%)	Pole Capacity (%)	Bending Stress (+/- psi)	Vertical Load (lbs)	Vertical Stress (psi)	Total Stress (psi)	Pole Capacity (%)
CROWN CASTLE NG WEST INC., COMMUNICATION	88	3.7	**1,828**	2.5	**1.3**	**39**	33	0	**39**	**1.3**
AT&T H	124	5.3	**2,471**	3.4	**1.8**	**52**	33	0	**52**	**1.8**
Existing	1,234	52.5	**42,613**	58.1	**30.2**	**899**	1,000	4	**903**	**30.4**
Proposed	237	10.1	**11,016**	15.0	**7.8**	**232**	622	2	**235**	**7.9**
Pole	667	28.4	**15,450**	21.1	**10.9**	**326**	3,142	12	**338**	**11.4**
<Undefined>	0	0.0	**0**	0.0	**0.0**	**0**	0	0	**0**	**0.0**
Totals:	2,350	100.0	**73,379**	100.0	**51.9**	**1,548**	4,830	19	**1,567**	**52.8**

Detailed Load Components:

Comm		Owner	Height (ft)	Horiz. Offset (in)	Cable Diameter (in)	Sag at Max Temp (ft)	Cable Weight (lbs/ft)	Lead/Span Length (ft)	Span Angle (deg)	Wire Length (ft)	Tension (lbs)	Tension Moment* (ft-lb)	Offset Moment* (ft-lb)	Wind Moment* (ft-lb)	Moment at GL* (ft-lb)
Overlashed Bundle	Overlashed	CROWN CASTLE NG WEST INC., COMMUNICATION	26.12	8.94	0.2420	0.78	0.104	45.0	348.0	45.0	84	702	1	146	849
Overlashed Bundle	Overlashed	AT&T H	24.42	8.05	0.2420	0.78	0.104	45.0	348.0	45.0	84	656	1	137	793

Overlashed Bundle	Overlashed	AT&T H	23.06	9.14	0.2500	0.78	0.104	45.0	348.0	45.0	85	625	1	134	759
											Totals:	**1,983**	**2**	**417**	**2,401**

GenericEquipment		**Owner**	**Height (ft)**	**Horiz. Offset (in)**	**Offset Angle (deg)**	**Rotate Angle (deg)**	**Unit Weight (lbs)**	**Unit Height (in)**	**Unit Depth (in)**	**Unit Diameter (in)**	**Unit Length (in)**	**Offset Moment* (ft-lb)**	**Wind Moment* (ft-lb)**	**Moment at GL* (ft-lb)**
Cylinder	2" MOUNT PIPE	Existing	41.96	55.15	90.0	0.0	10.00	85.00	--	2.00	--	-2	639	637
Box	AIR 6449	Proposed	41.96	55.09	176.8	0.0	103.60	33.10	8.30	--	20.50	-81	1,685	1,604
Box	4460 Radio	Proposed	41.96	56.57	193.5	0.0	103.60	19.40	12.40	--	15.70	58	1,457	1,515
Cylinder	2" MOUNT PIPE	Existing	41.96	20.40	90.0	0.0	10.00	85.00	--	2.00	--	1	639	640
Box	APXVAARR18_43-U-NA20	Existing	41.96	20.12	173.7	0.0	128.00	72.00	6.50	--	12.00	-48	2,886	2,838
Cylinder	2" MOUNT PIPE	Existing	41.96	20.40	90.0	0.0	10.00	85.00	--	2.00	--	5	639	644
Box	4460 Radio	Proposed	41.96	20.66	14.5	0.0	103.60	19.40	12.40	--	15.70	-24	1,459	1,435
Cylinder	2" MOUNT PIPE	Existing	41.96	55.15	90.0	0.0	10.00	85.00	--	2.00	--	9	639	648
Box	AIR 6449	Proposed	41.96	55.09	3.2	0.0	103.60	33.10	8.30	--	20.50	28	1,647	1,676
Cylinder	2" MOUNT PIPE	Existing	41.96	56.04	267.5	0.0	10.00	85.00	--	2.00	--	3	639	642
Box	APXVAARR18_43-U-NA20	Existing	41.96	57.74	196.4	0.0	128.00	72.00	6.50	--	12.00	104	2,920	3,024
Cylinder	2" MOUNT PIPE	Existing	41.96	22.49	267.5	0.0	10.00	85.00	--	2.00	--	6	639	645
Box	4460 Radio	Proposed	41.96	28.12	223.1	0.0	103.60	19.40	12.40	--	15.70	144	1,600	1,744
Cylinder	2" MOUNT PIPE	Existing	41.96	22.26	267.5	0.0	10.00	85.00	--	2.00	--	10	639	649
Box	AIR 6449	Proposed	41.96	26.03	318.7	0.0	103.60	33.10	8.30	--	20.50	166	2,877	3,043
Cylinder	2" MOUNT PIPE	Existing	41.96	55.78	267.5	0.0	10.00	85.00	--	2.00	--	14	639	653
Box	APXVAARR18_43-U-NA20	Existing	41.96	56.97	343.4	0.0	128.00	72.00	6.50	--	12.00	239	3,104	3,343
											Totals:	**631**	**24,749**	**25,380**

Crossarm		**Owner**	**Height (ft)**	**Horiz. Offset (in)**	**Offset Angle (deg)**	**Rotate Angle (deg)**	**Unit Weight (lbs)**	**Unit Height (in)**	**Unit Depth (in)**	**Unit Length (in)**	**Offset Moment* (ft-lb)**	**Wind Moment* (ft-lb)**	**Moment at GL* (ft-lb)**
Normal	10' Double Crossarm	Existing	45.50	7.03	90.0	90.0	96.00	4.75	3.75	120.00	0	6,840	6,840
Normal	10' Double Crossarm	Existing	38.50	7.62	90.0	90.0	96.00	4.75	3.75	120.00	0	5,788	5,788
										Totals:	**0**	**12,628**	**12,628**

Riser		**Owner**	**Height (ft)**	**Horiz. Offset (in)**	**Offset Angle (deg)**	**Rotate Angle (deg)**	**Unit Weight (lbs)**	**Unit Height (in)**	**Unit Depth (in)**	**Unit Diameter (in)**	**Unit Length (in)**	**Offset Moment* (ft-lb)**	**Wind Moment* (ft-lb)**	**Moment at GL* (ft-lb)**
Riser 343.0° H:37.5	Riser	Existing	37.50	9.23	343.0	343.0	37.50	450.00	6.00	6.00	450.00	44	5,296	5,340
Riser 335.0° H:37.5	Riser	Existing	37.50	9.23	335.0	335.0	37.50	450.00	6.00	6.00	450.00	34	5,002	5,036
Riser 340.0° H:37.5	Riser	Existing	37.50	9.23	340.0	340.0	37.50	450.00	6.00	6.00	450.00	39	5,198	5,237
Riser 318.0° H:25.5	Riser	CROWN CASTLE NG WEST INC., COMMUNICATION	25.50	9.23	318.0	318.0	25.50	306.00	3.00	3.00	306.00	40	939	979
Riser 330.0° H:22.5	Riser	AT&T H	22.50	9.23	330.0	330.0	22.50	270.00	3.00	3.00	270.00	43	858	902
											Totals:	**200**	**17,293**	**17,493**

Insulator		Owner	Height (ft)	Horiz. Offset (in)	Offset Angle (deg)	Rotate Angle (deg)	Unit Weight (lbs)	Unit Diameter (in)	Unit Length (in)	Offset Moment* (ft-lb)	Wind Moment* (ft-lb)	Moment at GL* (ft-lb)
Post	Three Bolt	Existing	45.70	55.00	187.3	90.0	5.00	3.00	0.10	0	1	1
Post	Three Bolt	Existing	45.70	20.00	199.4	90.0	5.00	3.00	0.10	0	1	1
Post	Three Bolt	Existing	45.70	-20.00	340.6	90.0	5.00	3.00	0.10	0	1	1
Post	Three Bolt	Existing	45.70	-55.00	352.7	90.0	5.00	3.00	0.10	0	1	1
Post	Three Bolt	Existing	45.70	55.00	187.3	-92.5	5.00	3.00	0.10	0	1	1
Post	Three Bolt	Existing	45.70	20.00	199.4	-92.5	5.00	3.00	0.10	0	1	1
Post	Three Bolt	Existing	45.70	-20.00	340.6	-92.5	5.00	3.00	0.10	0	1	1
Post	Three Bolt	Existing	45.70	-55.00	352.7	-92.5	5.00	3.00	0.10	0	1	1
Bolt	Single Bolt	CROWN CASTLE NG WEST INC., COMMUNICATION	26.12	0.00	348.0	258.0	5.00	3.00	0.10	0	1	1
J-Hook	Insulator, 15 kV	AT&T H	24.42	0.00	348.0	258.0	1.00	1.00	8.00	0	16	16
Bolt	Single Bolt	AT&T H	23.06	0.00	348.0	258.0	5.00	3.00	0.10	0	1	1
									Totals:	**0**	**26**	**26**

Pole Buckling

Buckling Constant	Buckling Column Height* (ft)	Buckling Section Height (% Buckling Col. Hgt.)	Buckling Section Diameter (in)	Minimum Buckling Diameter at GL (in)	Diameter at Tip (in)	Diameter at GL (in)	Modulus of Elasticity (psi)	Pole Density (pcf)	Ice Density (pcf)	Pole Tip Height (ft)	Buckling Load Capacity at Height (lbs)	Buckling Load Applied at Height (lbs)	Buckling Load Factor of Safety
2.00	29.85	34.20	16.26	10.65	9.87	17.99	1.60e+6	60.00	57.00	48.14	39,212	**395.89**	**8.20**

ATTACHMENT B

Site ID: LA33441E

Pole ID: LA33441E

Location: Dana Point

Staff Findings: The cover of access hatch at pole was missing.

Photo of remediation:

Site ID: LA33867B

Pole ID: LA33867B

Location: Laguna Niguel

Staff Findings: The cover of access hatch at pole was missing.

Photo of remediation:

Site ID: LA23192C

Pole ID: LA23192C

Location: Laguna Niguel

Staff Findings: The cover of access hatch at pole was missing.

Photo of remediation:

ATTACHMENT C

Site ID: LA03015F

Pole ID: LA03015F

Location: Orange

Staff Findings: The cover of the handhole at the location was not securely closed, allowing unauthorized access to the structures.

Photo of remediation:

Site ID: LA33867B

Pole ID: LA33867B

Location: Laguna Niguel

Staff Findings: The cover of the handhole at the location was not securely closed, allowing unauthorized access to the structures.

Photo of remediation:

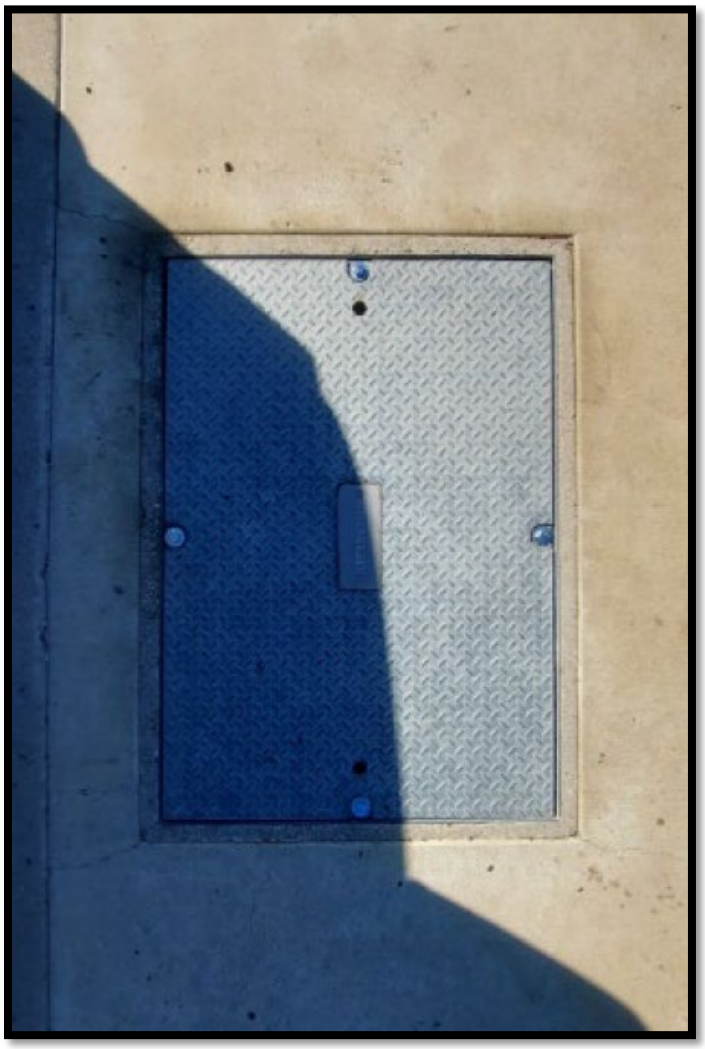
Site ID: LA33451B

Pole ID: LA33451B

Location: Laguna Niguel

Staff Findings: The cover of the handhole at the location was not securely closed, allowing unauthorized access to the structures.

Photo of remediation:



Site ID: LA33445A

Pole ID: LA33445A

Location: Laguna Niguel

Staff Findings: The cover of the handhole located at location was not securely closed, allowing unauthorized access to the structures.

Photo of remediation:

Site ID: LA23192C

Pole ID: LA23192C

Location: Laguna Niguel

Staff Findings: The cover of access hatch at pole was missing.

Photo of remediation:

Site ID: LA33493C

Pole ID: LA33493C

Location: Costa Mesa

Staff Findings: The cover of the handhole located at each of the following locations was not securely closed, allowing unauthorized access to the structures.

Photo of remediation:

Site ID: LA02947A

Pole ID: LA02947A

Location: Westminster

Staff Findings: The cover of the handhole at the location was not securely closed, allowing unauthorized access to the structures. (2 handholes)

Photo of remediations:


IN CASE OF
EMERGENCY
CALL
1-800-662-4662
COM