

1. General Order (GO) 95, Rule 18-B, Maintenance Program

a. Astounds GO 95 training material had defined priority levels:

- Level 1 – Immediate Safety/Reliability Risk – Fix immediately
- Level 2 – Moderate Risk – Fix within 6-12 months depending on fire-threat zone
- Level 3 – Low Risk – up to 60 months for correction.

However, Astounds records for its work orders and Repair Tickets (RT) did not assign priority levels or due dates. Therefore, Astound did not demonstrate that it prioritizes or schedules corrective actions associated with potential violations of GO 95 in accordance with GO 95, Rule 18-B (1).

Astounds RT System does have a priority level system in place (See attached screenshot 'RT Ticket - Priority Level.jpg'). This did not translate to the 'Bay Area - PUC Infraction Submittals_2021 – 2026.xlsx' file I submitted. We have recently upgraded our RT system to mimic the Priority levels above including their definitions and timelines.

b. Astounds GO 95 training material on Communication Line Clearances stated that at the pole, the clearance distance was 40 inches between the power and broadband drop. GO 95 Table 2 row 8 column D requires a clearance of 48 inches.

Astound has made the corrections to the training material mentioned above (see attached screenshots 'Distance from Power_01 and 01b.jpg').

c. Astound recorded six work orders as completed, but these work orders were not actually completed when ESRB observed the locations in the field. These work orders are listed in Table 1 below

3NWO Chilco St Along Bayfront Expwy, Menlo Park – RT Ticket 6838607 - There is not 4' of separation of Wave and power
719 Crystal Springs Rd, Hillsborough – RT Ticket N/A - Pole Transfer
210 Chestnut Ave, South San Francisco – RT Ticket 10352228 - Conductor Inadequate Clearance
Brannan & 3rd St, San Francisco – RT Ticket 7213388 - Wave too close to power
3527 18th St, San Francisco – RT Ticket 6876263 - Cable Laying on Comcast
160 Santa Marina St, San Francisco – RT Ticket 9869915 - STRD COND (LOOSE)

Astound is currently reviewing the (6) addresses mentioned above. We will be requiring our contracting partners to follow up where repairs are needed. Astound has since required our contracting partners to submit before and after pictures of all repairs Astound requested so this does not continue to happen.

2. General Order (GO) 95, Rule 80.1A(1) – Inspection Requirements for Join-Use Poles in High Fire Threat District

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

Astound did not provide any detailed inspection records for Tier 2 locations for the eight-year period from 2019 to 2026.

Astound has selected third-party inspection vendors and is finalizing the contracts for a patrol and detailed inspection program planned to begin in 2027. The program will combine LiDAR data collection with field personnel walkouts to document the condition of our communication facilities, including those in High Fire Threat Districts. The selected vendors are familiar with GO 95 inspection and reporting requirements. Astound is establishing a centralized database for the inspection data and will oversee the program and retain its records.

3. GO 95, Rule 80.1-A (4), Record Keeping

The records for Tier 2 HFTD Patrols did not have the results of the Patrol inspection and did not identify the personnel who performed the Patrols in Tier 2 sites.

Astound has selected third-party vendors experienced in GO 95 inspection reporting and is finalizing contracts for a 2027 program launch. LiDAR data collection and field personnel walkouts will feed a new centralized inspection database. For each inspected facility, the record will include location details down to GPS coordinates, the inspection date and type, the personnel who performed the inspection, and the inspection results and identified conditions. Astound will also document the date and description of corrective actions and the personnel who perform them. We will review vendor submissions for completeness, retain the records for at least ten years, and make them available for CPUC review.

4. GO 95, Rule 80.1-A (2) – Statewide Inspection Requirement

Astound did not provide procedures for conducting Patrols or Detailed Inspections on all communication lines throughout the state. The procedure on Patrols and Detailed Inspections for non-tier 2 and 3 locations is missing.

Astound is finalizing contracts with selected third-party vendors for statewide patrol and detailed inspections beginning in 2027. The vendors are familiar with GO 95 reporting requirements and the inspection data that must be collected. Before the program begins, Astound will establish written procedures and a patrol checklist covering its communication lines statewide, including locations outside Tier 2 and Tier 3 High Fire Threat Districts. The procedures will describe how facilities are included in the inspection schedule, the conditions inspectors must identify, and how findings are escalated for correction. Inspection type, frequency, and thoroughness will account for fire threat, proximity to overhead power facilities, terrain, accessibility, and location. LiDAR data collection will support the field personnel walkouts, and the inspection findings and GPS-level location details will be stored in the new database. Astound will oversee the vendors and update the procedures as needed.

5. GO 128, Rule 17.2, Inspection

Astound provided no procedure to ensure underground assets are inspected thoroughly and completely as required by GO 128.

Astound has made the corrections to the training material mentioned above (see attached screenshots 'GO128_Page_01 – 03.jpg').

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Astound has entered all the facilities visited during the audit into our RT system to repair accordingly.