

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 8, 2026

CA2026-1418

Jane Whang
Regulatory and State Government Affairs
Verizon Communications Inc. (Verizon)
375 West Trimble Road
San Jose, CA 95131

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Verizon Contra Costa County Group

Ms. Whang:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Nora Nguyen and Emiliano Solorio of ESRB staff conducted a CIP audit of Verizon's Contra Costa County Group from June 15-19, 2026. During the audit, ESRB staff conducted field inspections of Verizon'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 and observations is enclosed. Please provide a response no later than November 6, 2026, by electronic copy of all corrective actions and preventive measures taken by Verizon to correct the identified violations and prevent the recurrence of such violations and observations.

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 Nora Nguyen at nora.nguyen@cpuc.ca.gov or (625) 255-0111.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nora Nguyen".

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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 Verizon Contra Costa County Group

CC: Lee Palmer, Deputy Executive Director, Safety Policy Division and Water Division, CPUC
Koko Tomassian, Director, Safety and Enforcement Division (SED), CPUC
Chihsien "Eric" Wu, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Program & Project Supervisor, ESRB, SED, CPUC
Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Yongling Sun, Public Utilities Regulatory Analyst V, ESRB, SED, CPUC
Rex Knowles, Director of Government Affairs, Verizon
John Gavin, Regulatory and State Government Affairs, Verizon
Daryl Smith, Senior Engineer Specialist – Network Engineering, Verizon
Howard Chadwick, Engineer IV Specialist – Network Engineering and Operations, Verizon

VERIZON CONTRA COSTA COUNTY GROUP
COMMUNICATIONS AUDIT FINDINGS
June 15-19, 2026

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Verizon's Contra Costa County Group for the time frame of May 2021 through May 2026, unless stated otherwise:

- Facility Statistics for Contra Costa County Group
- List of Active Inspectors, with Date of Training/ Qualifications
- Records for outgoing Safety Hazard Notifications
- List of safety factors and pole loading calculations
- Master List of Verizon Wireless Inspection Records, 2021 through 2026
- Verizon Business Inspection Tracker, 2021 through 2026
- Map of Verizon Overhead and Underground Facilities in Contra Costa County
- Motive (Verizon contractor) GO 95 Inspection Program for Verizon
- Motive Aerial Patrol Inspection Guidelines
- Motive Patrol Inspection Fiber Checklist
- Motive Patrol Inspection Antenna Site Checklist
- Motive Sitetracker Detailed Inspection Procedure for Verizon Field Ops Version 2.0

II. Record Violations

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

1. General Order (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*
- iii. Level 3 -- Any risk of low potential impact to safety or reliability”*

ESRB requested a master list of all patrol and detailed inspection records conducted for wired, wireless, underground, and overhead facilities between May 2021 through May 2026. Verizon

facilities include two systems, Verizon Business and Verizon Wireless, which maintain separate operations and record-management. Verizon Business is responsible for Verizon's wired, fiber communication system, while Verizon Wireless manages their antenna sites and radio equipment. Inspection records provided included the 68 Verizon Wireless facilities subject to GO 95 in Contra Costa County. The provided Verizon Wireless inspection records listed inspections by year and not the actual date. Verizon Business inspection records included patrol and detailed inspection records of 831 poles in Contra Costa County performed in 2021 - 2026. According to Verizon's statistics, Contra Costa County has a total of 1,516 poles subject to GO 95. Verizon Business did not list any other poles beyond the 831 inspection records, nor were inspection due dates included. No inspection records associated with any underground facilities by Verizon Business were provided despite having 1,409 underground structures in Contra Costa County. Due to the absence of auditable records, ESRB could not confirm the completion of timely inspections for all of Verizon's facilities.

ESRB staff also requested a master list of all open, completed, and canceled work orders created for Verizon facilities, which Verizon was unable to provide. The materials/records submitted do not identify work order due dates, nor completion of corrective actions. ESRB could not verify whether corrective actions were performed or scheduled due to Verizon not meeting record-keeping obligations required for an auditable maintenance program.

2. GO 95, Rule 44.1, Installation and Reconstruction states:

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.

ESRB reviewed Verizon's pole loading calculations for selected poles and found that one of the inputs used in the O-Calc Pro Analysis software did not accurately reflect the facility present in the field. Specifically, the pole loading calculation performed on Pole #121811609 at location 73 listed 1.5" Innerduct as the main Telco attachment, when field inspection identified the presence of thicker and significantly heavier copper communication cables. The conductor type directly affects load and safety factor calculations; thus, accurate representations must be used when calculating the load of the structure. The misidentification of different material in this case severely underestimates the actual loading capacity needed, resulting in a potentially unsafe and overloaded pole.

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

Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a).

Verizon's records of their facilities appear to not be regularly updated, resulting in discrepancies between digital records and what was seen in the field. ESRB were unable to find several Verizon facilities in the field, despite the records showing they exist. In locations 50, 51, and 54, digital records identified a Verizon attachment as located on the pole, but subsequent field inspections by ESRB found that no such facility was present at the mapped location. In addition, field inspections and discussions also revealed that multiple Verizon Wireless facilities were only recently discovered, indicating gaps in Verizon's internal system to document legacy or inherited facilities. Furthermore, review of Verizon's tracker showed "proposed" facilities dating back to 2019 continue to appear in their database, but utility staff were unable to confirm whether these installations currently exist. These inconsistencies demonstrate lacking record keeping procedures, which may hinder inspection efforts and result in an inaccurate assessment of Verizon's overall system.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Asset Type	Asset Number	Latitude	Longitude
1	Antenna	N/A	37.9289932	-122.0163780
2	Meter Pedestal	N/A	37.9290406	-122.0163210
3	Vault	N/A	37.9289792	-122.0164162
4	Vault	N/A	37.9310507	-122.0182291
5	Vault	N/A	37.9298162	-122.0170751
6	Vault	N/A	38.0041069	-122.2984324
7	Pole	110233358	37.9280776	-122.3617694
8	Pole	110233362	37.9279813	-122.3622617
9	Pole	121911245	37.9279690	-122.3627417
10	Pole	121911247	37.9279994	-122.3633190
11	Pole	12224023	37.8845452	-122.2402955
12	Vault	N/A	37.8792245	-122.1678008
13	Pole	121030184	37.8642198	-122.1354443
14	Pole	110335158	37.8639097	-122.1348927
15	Pole	110335160	37.8636173	-122.1342854
16	Pole	120243358	37.8539319	-122.1036263
17	Pole	120835318	37.8540117	-122.1036344
18	Pole	121030298	37.8546898	-122.1036184
19	Pole	121322429	37.9188425	-122.1068042
20	Pole	120049663	37.9184133	-122.1066585
21	Pole	110160457	37.9179576	-122.1062784
22	Pole	N/A	37.8946497	-121.7962049
23	Pole	N/A	37.8946987	-121.7960344
24	Pole	N/A	37.8946181	-121.7956312
25	Pole	N/A	37.8907773	-121.8059211
26	Pole	N/A	37.8906800	-121.8059545
27	Pole	N/A	37.8906416	-121.8050679
28	Pole	N/A	37.8906694	-121.8065410
29	Pole	N/A	37.8906386	-121.8069377
30	Pole	120856253	37.8546461	-122.0355516

31	Pole	110286367	37.8646139	-122.0304256
32	Pole	110372457	37.8650821	-122.0304521
33	Pole	110372455	37.8652896	-122.0305521
34	Pole	110372456	37.8656984	-122.0306515
35	Pole	120251853	37.8666878	-122.0429923
36	Vault	N/A	37.8666576	-122.0429729
37	Pole	120146320	37.8749618	-122.0478946
38	Vault	N/A	37.8750082	-122.0478878
39	Pole	121816770	37.8751354	-122.0519633
40	Pole	110254823	37.8754864	-122.0521125
41	Pole	121816628	37.8758285	-122.0522693
42	Pole	110254820	37.8762788	-122.0523473
43	Pole	110254777	37.8751619	-122.0521719
44	Pole	110254778	37.8750276	-122.0529509
45	Pole	110254779	37.8749812	-122.0533882
46	Pole	110254780	37.8751189	-122.0538325
47	Vault	N/A	37.7342834	-121.9265109
48	Pole	110221454	37.7342546	-121.9264612
49	Vault	N/A	37.7342502	-121.9250182
50	Pole	110245553	37.7343080	-121.9249908
50	Pole	110245553	37.7342933	-121.9249607
51	Pole	110245661	37.7832271	-121.9678484
52	Pole	121755538	37.7830277	-121.9682742
53	Pole	121755533	37.7829222	-121.9684656
54	Pole	110245658	37.7826453	-121.9692478
56	Vault	N/A	37.7869838	-121.9779103
57	Vault	N/A	37.7878925	-121.9787192
58	Pole	110259282	37.7878978	-121.9787129
59	Pole	110259283	37.7883963	-121.9791198
60	Pole	110259284	37.7888920	-121.9795608
61	Pole	110259285	37.7894304	-121.9800818
62	Vault	N/A	37.7894450	-121.9800423
63	Vault	N/A	37.7971904	-121.8881631
64	Vault	N/A	37.7969725	-121.8891682
65	Vault	N/A	37.8194241	-121.9743841

66	Pole	121023919	37.8194493	-121.9743538
67	Pole	110264828	37.8319159	-121.9530271
68	Pole	121024777	37.8318747	-121.9535362
69	Pole	110264826	37.8319732	-121.9537766
70	Pole	110264774	37.8319126	-121.9542805
71	Pole	110264773	37.8319467	-121.9546764
72	Pole	110355507	37.8357475	-121.9721740
73	Pole	121811609	37.8354580	-121.9730526
74	Pole	110286554	37.8354122	-121.9736580
75	Pole	N/A	37.8353567	-121.9744093
76	Pole	110286556	37.8352647	-121.9750922
77	Pole	110286627	37.8353062	-121.9756096
78	Pole	110263758	37.9795607	-122.0376842
79	Pole	120173313	37.9553229	-122.0013464
80	Pole	110255957	37.9551108	-122.0010185
81	Vault	N/A	37.9551461	-122.0010419
82	Pole	110255960	37.9556917	-122.0016435
83	Pole	110255962	37.9561515	-122.0021340
84	Pole	110510981	37.9564994	-122.0025227
85	Pole	110255964	37.9567213	-122.0027036
86	Pole	110255966	37.9573591	-122.0033052
87	Vault	N/A	37.9573916	-122.0033201
88	Pole	110158356	37.9925586	-122.0736371
89	Pole	N/A	37.9922158	-122.0735467
90	Pole	110158362	37.99169146	-122.0734255
91	Pole	121989525	37.99111841	-122.0732884
92	Pole	121594279	37.99105753	-122.0732152
93	Pole	110418896	37.99027946	-122.0733927
94	Vault	N/A	37.92704689	-122.0192638

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.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard.”

ESRB’s findings related to the above rule are listed in Table 1:

Table 1: GO 95, Rule 31.1 Findings

Location	Finding
9	Buddy pole. Verizon needs to transfer their facilities.
10	Buddy pole. Verizon needs to transfer their facilities.
24	The pole is leaning.
25	Equipment is not grounded.
30	Verizon’s power shutoff box is unlocked.
39	Buddy pole. Verizon needs to transfer their facilities.
66	Missing locks on panel boxes. Customer side of meter and disconnect box.
67	Line has broken lashing.
73	Inaccurate pole load calc. Incorrect CATV input and AT&T conductor input.
82	Line has broken lashing.

91	Buddy pole. Verizon needs to transfer their facilities.
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2. 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.”

ESRB’s finding related to the above rule is listed in Table 2:

Table 2: GO 95, Rule 84.6-B Finding

Location	Finding
27	Exposed ground wire.

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.”

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

Table 3: GO 95, Rule 86.2 Findings

Location	Finding
22	Loose down guy.
92	Loose down guy.

4. GO 95, Rule 87.4-H Clearances From Grounded Metal Boxes, Hardware and Equipment Associated with Supply Lines states in part:

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

ESRB’s finding related to the above rule is listed in Table 4:

Table 4: GO 95, Rule 87.4-H Finding

Location	Finding
30	Clearance of messenger from grounded metal box less than 48 inches.

5. GO 95, Rule 86.9 Guy Marker (Guy Guard) states in part:

“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.”

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

Table 5: GO 95, Rule 86.9 Finding

Location	Finding
22	Missing guy guard on outermost guy wire.

6. GO 95, Rule 87.9-D Risers states in part:

“(1) Covered from Ground Level to 8 Feet above the Ground:

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.

(2) Covered from 8 Feet above the Ground Level and Above:

(a) Risers shall be covered by a suitable protective covering, as defined in Rule 22.8 where within a vertical distance of 3 feet above or 6 feet below the level of unprotected supply conductors when supported on the same pole or structure or within a 6-foot

radius of another pole supporting unprotected supply conductors, except that when the riser is protected by a guard arm installed in accordance with Rule 87.4–C3 the 6 feet may be reduced to not less than 4 feet.”

ESRB’s findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 87.9-D Findings

Location	Finding
48	Riser cover not properly secured.
60	Verizon line is within 4 feet of secondary power with guard arm.
61	Riser not covered below 8ft.
88	Riser not covered below 8ft.

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

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. 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).”

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

Table 7: GO 95, Rule 35 Findings

Location	Finding
24	There is vegetation strain on the cable.
34	There is vegetation strain on the cable.

8. GO 95, Rule 38 Minimum Clearances 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 s of transposition and shall not be held in violation of Table 2, Cases 8–15, inclusive.”

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

Table 8: GO 95, Rule 38 Findings

Location	Finding
9	Verizon cable is in contact with CATV at midspan.
25	Clearance between top of Verizon antenna and foreign communication line is less than 48 inches.
31	Verizon splice box is in contact with CATV.
32	Verizon fiber is in contact with guy wire.
52	Verizon fiber is in contact with third party fiber.

9. 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.”

ESRB's finding related to the above rule is listed in Table 9:

Table 9: GO 128, Rule 17.8 Finding

Location	Finding
2	Missing ownership marking.

V. Observations

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

“(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95.”

ESRB found the following third-party observations in the field, listed in Table 10.

Table 10: Third-Party Observations

Location	Finding
7	Sonic attached to MCI midspan.
8	AT&T service drop is in contact with PG&E’s secondary line.
11	Exposed ground wire. Overgrown vegetation impeding climbing space.
13	AT&T needs to transfer their facilities to new pole.
14	AT&T needs to transfer their facilities to new pole and has an abandoned service drop. PG&E riser is not secured every 3ft. PG&E jumper cables impeding climbing space.
15	Overgrown vegetation impeding climbing space.
16	Riser not covered below 8ft.
21	Leaning pole greater than 10%.
22	Abandoned guy anchor by AT&T.

26	Vegetation strain on cable. Broken lashing wire. Abandoned ground rod.
29	Leaning pole greater than 10%. Riser not covered below 8ft.
30	Buddy pole. Incomplete pole transfer.
33	Guy wire in contact with AT&T splice.
35	Buddy pole. Incomplete pole transfer. Lashing wire broken.
37	Vegetation strain on cable.
39	Buddy pole. Incomplete pole transfer.
40	Overgrown vegetation impeding climbing space.
41	Buddy pole. Incomplete pole transfer.
42	Comcast riser not covered below 8ft and not secured.
45	Vegetation strain on communication lines and abandoned CATV drop.
46	Riser not covered below 8ft and Comcast exposed ground wire.
48	Loose down guy for power and AT&T.
50	No double arm guard for cable within 6ft of common neutral at AT&T dead end. CATV improper attachment to pole and abandoned facilities. Broken neutral on customer service drop (reported to PG&E in-field).
51	Abandoned AT&T facilities.
52	Riser not covered below 8ft.
53	Buddy pole. Incomplete pole transfer. AT&T cable in contact with electrical down guy wire.
54	Exposed ground wire.
58	Abandoned AT&T drops.
60	Overgrown vegetation impeding climbing space.
67	Exposed ground wire.
69	Riser not covered below 8ft and not secured every 3 ft.
70	Vegetation strain on electrical service drop for 2019 Diablo Rd.
71	Riser cover not secured below 8ft.
72	Midspan clearance of communication lines is below 18'. PG&E common neutral measured around 16'. Broken communication down guy guard.
73	Riser not covered below 8ft and not secured every 3 ft.
74	Abandoned facilities.

75	Abandoned facilities.
76	Riser not covered below 8ft and not secured every 3 ft. CATV exposed ground rod and not 2ft. away from pole.
77	Excessive pole lean and abandoned conductor.
79	Riser cover not secured below 8ft.
82	Communication line clearance less than 12 in / contact to traffic light without any protection.
83	Riser not covered below 8ft.
84	Lashing wire broken.
86	Abandoned facilities.
88	Abandoned facilities.
89	Unattached riser and missing riser guard. AT&T and unknown CATV line in contact with the traffic light.
91	Unsecured/ hanging slice box.
92	Loose down guy and broken guy guard. Riser not covered below 8ft and not secured every 3 ft. Comcast abandoned drop.