

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 11, 2012

CA2012-001

Ross Johnson
Area Manager Regulatory Relations
AT&T California
525 Market Street, 19th Floor, # 33
San Francisco, CA 95105

SUBJECT: Audit of AT&T California's Orange County Facilities

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Mahmoud Intably and Koko Tomassian conducted an audit of AT&T California's (AT&T) facilities in Orange County on February 21 - 24, 2012. The audit included a review of AT&T's maintenance records and inspections of AT&T's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than June 15, 2012, by electronic or hard copy, of all corrective measures taken by AT&T California to remedy and prevent such violations.

If you have any questions concerning this audit you can contact, Mahmoud (Steve) Intably of my staff at (213) 576-7016 or Mahmoud.Intably@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stepanian", with a long horizontal flourish extending to the right.

Raffy Stepanian, P.E.
Program Manager
Electric Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

CC: Raymond Fugere, Program and Project Supervisor, CPUC
Mahmoud Intably, Utilities Engineer, CPUC

Audit Summary

Company: AT&T California – South Region
Communication Infrastructure Provider Audit
Date: February 21-24, 2012

Programmatic Violations

GO 95, Rule 18-A1b, states:

(b) Upon completion of the corrective action, the company's records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years and shall be made available to Commission staff upon 30 days notice.

...

(ii) Level 2:

- *Variable (non-immediate high to low) safety and/or reliability risk.*
- *Take action to correct within specified time period (fully repair, or by temporarily repairing and reclassifying the condition to a lower priority).*

Time period for correction to be determined at the time of identification by a qualified company representative, but not to exceed: (1) 12 months for nonconformances that compromise worker safety, (2) 12 months for nonconformances that create a fire risk and are located in an Extreme or Very High Fire Threat Zone in Southern California, and (3) 59 months for all other Level 2 nonconformances.

AT&T's maintenance plan does not address Level 2 correction items that must be corrected within 12 months.

GO 95, Rule 80.1-A2, Statewide Inspection Requirements, states:

"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."

AT&T did not have procedures for conducting patrols or details inspections for all its overhead communication lines throughout the state.

GO 128 Rule 17.2, Inspection of Lines, 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 had an inspection program focused primarily on facilities that it considered problematic. AT&T’s focus on inspecting problem areas does not constitute a “thorough” inspection program per GO 128.

Field Violations

1.	Structure ID / Location: 1032392H
	Previous AT&T Visit Details: 2010
	Date of CPUC Inspection: February 21-24, 2012
Explanation of Violation(s):	
<p><u>Broken Lashing Wire</u> GO 95, Rule 31.1, Additional Construction, states in part:</p> <p style="text-align: center;"><i>“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.”</i></p> <p>This pole supported a cable that had a broken lashing wire. This violation was not documented when AT&T last visited the pole.</p>	
<p><u>Vegetation Contact</u> GO 95, Rule 35, Vegetation Management, states in part:</p> <p style="text-align: center;"><i>“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 ... 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).”</i></p> <p>This pole supported a communication cable that was in contact with vegetation and showed signs of abrasion. This violation was not documented when AT&T last visited the pole.</p>	
<p><u>Loose Guy Wire</u> GO 95, Rule 86.2, Use, states:</p> <p style="text-align: center;"><i>“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.”</i></p> <p>The pole had a loose guy wire. This violation was not documented when AT&T last visited the pole.</p>	

2.	Structure ID / Location:	1032392H
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<p data-bbox="175 590 472 621"><u>Broken Lashing Wire</u></p> <p data-bbox="175 625 911 657">GO 95, Rule 31.1, Additional Construction, states in part:</p> <p data-bbox="305 701 1446 814"><i>“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.”</i></p> <p data-bbox="175 852 1463 919">This pole supported a cable that had a broken lashing wire. This violation was not documented when AT&T last visited the pole.</p>		

3.	Structure ID / Location:	1033355H
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<p data-bbox="162 546 1490 588"><u>Broken Lashing Wire</u></p> <p data-bbox="162 588 1490 630">GO 95, Rule 31.1, Additional Construction, states in part:</p> <p data-bbox="292 651 1490 777"><i>“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.”</i></p> <p data-bbox="162 798 1490 882">This pole supported a cable that had a broken lashing wire. This violation was not documented when AT&T last visited the pole.</p> <p data-bbox="162 913 1490 955"><u>Vegetation Contact</u></p> <p data-bbox="162 955 1490 997">GO 95, Rule 35, Vegetation Management, states in part:</p> <p data-bbox="292 1018 1490 1291"><i>“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 ... 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).”</i></p> <p data-bbox="162 1312 1490 1398">This pole supported a communication cable that was in contact with vegetation and showed signs of abrasion. This violation was not documented when AT&T last visited the pole.</p>		

4.	Structure ID / Location:	832482H
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<p data-bbox="175 531 472 562"><u>Broken Lashing Wire</u></p> <p data-bbox="175 569 911 600">GO 95, Rule 31.1, Additional Construction, states in part:</p> <p data-bbox="305 642 1446 751"><i>“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.”</i></p> <p data-bbox="175 793 1463 863">This pole supported a cable that had a broken lashing wire. This violation was not documented when AT&T last visited the pole.</p> <p data-bbox="175 905 435 936"><u>Vegetation Contact</u></p> <p data-bbox="175 942 889 974">GO 95, Rule 35, Vegetation Management, states in part:</p> <p data-bbox="305 1016 1463 1276"><i>“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 ... 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).”</i></p> <p data-bbox="175 1318 1455 1388">This pole supported a communication cable that was in contact with vegetation and showed signs of abrasion. This violation was not documented when AT&T last visited the pole.</p> <p data-bbox="175 1430 659 1461"><u>Reduced Clearance Between Cables</u></p> <p data-bbox="175 1467 1203 1499">GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p data-bbox="305 1541 1455 1650"><i>“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. ...</i></p> <p data-bbox="305 1692 1422 1761"><i>The clearances in Table 2 shall in no case be reduced more than 10 percent because of temperature and loading as specified in Rule 43”</i></p> <p data-bbox="175 1803 1414 1873">The pole had a service drop touching a service drop of a different communication company. This violation was not documented when AT&T last visited the pole.</p>		

5.	Structure ID / Location:	832479H
Previous AT&T Visit Details:		2010
Date of CPUC Inspection:		February 21-24, 2012
Explanation of Violation(s):		
<u>Broken Lashing Wire</u>		
GO 95, Rule 31.1, Additional Construction, states in part:		
<p style="text-align: center;"><i>“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.”</i></p>		
<p>This pole supported a cable that had a broken lashing wire. This violation was not documented when AT&T last visited the pole.</p>		
<u>Vegetation Contact</u>		
GO 95, Rule 35, Vegetation Management, states in part:		
<p style="text-align: center;"><i>“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 ... 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).”</i></p>		
<p>This pole supported a communication cable that was in contact with vegetation and showed signs of abrasion. This violation was not documented when AT&T last visited the pole.</p>		
<u>Reduced Clearance Between Cables</u>		
GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:		
<p style="text-align: center;"><i>“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. ...</i></p>		
<p style="text-align: center;"><i>The clearances in Table 2 shall in no case be reduced more than 10 percent because of temperature and loading as specified in Rule 43”</i></p>		
<p>The pole had a service drop touching a service drop of a different communication company. This violation was not documented when AT&T last visited the pole.</p>		

6.	Structure ID / Location:	81041214H
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<u>Damaged Guy Guard</u>		
GO 95, Rule 31.1, Additional Construction, states in part:		
<p style="text-align: center;"><i>“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.”</i></p>		
The down guy at this pole had a damaged guard. This violation was not documented when AT&T last visited the pole.		

7.	Structure ID / Location:	2333424E
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<u>Tree Contacting Guy Wire</u>		
GO 95, Rule 31.1, Additional Construction, states in part:		
<p style="text-align: center;"><i>“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.”</i></p>		
The guy at this pole had a tree limb pushing down on it. This violation was not documented when AT&T last visited the pole.		

8.	Structure ID / Location:	104467H
Previous AT&T Visit Details:		2010
Date of CPUC Inspection:		February 21-24, 2012
Explanation of Violation(s):		
<p data-bbox="175 554 472 590"><u>Broken Lashing Wire</u></p> <p data-bbox="175 590 730 625">GO 95, Rule 31.6, Abandoned Lines, states</p> <p data-bbox="305 667 1466 814"><i>“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.”</i></p> <p data-bbox="175 852 1398 919">This pole had an abandoned service drop. This violation was not documented when AT&T last visited the pole.</p> <p data-bbox="175 961 440 997"><u>Vegetation Contact</u></p> <p data-bbox="175 997 889 1033">GO 95, Rule 35, Vegetation Management, states in part:</p> <p data-bbox="305 1075 1471 1339"><i>“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 ... 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).”</i></p> <p data-bbox="175 1373 1458 1440">This pole supported a communication cable that was in contact with vegetation and showed signs of abrasion. This violation was not documented when AT&T last visited the pole.</p>		

9.	Structure ID / Location:	724943H
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<u>Broken Lashing Wire</u>		
GO 95, Rule 31.6, Abandoned Lines, states		
<p><i>“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.”</i></p>		
This pole had an abandoned service drop. This violation was not documented when AT&T last visited the pole.		

10	Structure ID / Location:	724943H
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<u>Broken Lashing Wire</u>		
GO 95, Rule 31.6, Abandoned Lines, states		
<p><i>“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.”</i></p>		
This pole had an abandoned service drop. This violation was not documented when AT&T last visited the pole.		

11	Structure ID / Location:	832477H
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<p data-bbox="185 554 456 590"><u>Vegetation Contact</u></p> <p data-bbox="185 590 906 625">GO 95, Rule 35, Vegetation Management, states in part:</p> <p data-bbox="318 663 1442 926"><i>“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 ... 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).”</i></p> <p data-bbox="185 963 1471 1037">This pole supported a communication cable that was in contact with vegetation and showed signs of abrasion. This violation was not documented when AT&T last visited the pole.</p> <p data-bbox="185 1075 675 1110"><u>Reduced Clearance Between Cables</u></p> <p data-bbox="185 1110 1222 1146">GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p data-bbox="318 1184 1471 1289"><i>“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. ...</i></p> <p data-bbox="318 1335 1442 1409"><i>The clearances in Table 2 shall in no case be reduced more than 10 percent because of temperature and loading as specified in Rule 43”</i></p> <p data-bbox="185 1446 1442 1554">The pole had a service drop with less than 12 inches radial clearance from a communication cable of a different communication company. This violation was not documented when AT&T last visited the pole.</p>		

12	Structure ID / Location:	4504719E
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<p><u>Vegetation Contact</u> GO 95, Rule 35, Vegetation Management, states in part:</p> <p><i>“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 ... 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).”</i></p> <p>This pole supported a communication cable that was in contact with vegetation and showed signs of abrasion. This violation was not documented when AT&T last visited the pole.</p>		

13	Structure ID / Location:	1047392H
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<p><u>Vegetation Contact</u> GO 95, Rule 35, Vegetation Management, states in part:</p> <p><i>“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 ... 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).”</i></p> <p>This pole supported a communication cable that was in contact with vegetation and showed signs of abrasion. This violation was not documented when AT&T last visited the pole.</p>		

14	Structure ID / Location:	501357H
Previous AT&T Visit Details:		2010
Date of CPUC Inspection:		February 21-24, 2012
Explanation of Violation(s):		
<p data-bbox="181 558 451 588"><u>Vegetation Contact</u></p> <p data-bbox="181 596 902 625">GO 95, Rule 35, Vegetation Management, states in part:</p> <p data-bbox="315 667 1438 928"><i>“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 ... 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).”</i></p> <p data-bbox="181 970 1468 1037">This pole supported a communication cable that was in contact with vegetation and showed signs of abrasion. This violation was not documented when AT&T last visited the pole.</p> <p data-bbox="181 1079 617 1108"><u>Riser Not Effectively Grounded</u></p> <p data-bbox="181 1117 1341 1146">GO 95, Rule 87.7D(1)(a), Covered from Ground Level to 8 Feet above the Ground, states:</p> <p data-bbox="298 1230 1351 1373"><i>“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.”</i></p> <p data-bbox="181 1415 1331 1482">The pole had a steel riser cover that was not effectively grounded. This violation was not documented when AT&T last visited the pole.</p>		

15	Structure ID / Location:	1718250E
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<u>Reduced Clearance Between Cables</u>		
GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:		
<p><i>“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. ...</i></p> <p><i>The clearances in Table 2 shall in no case be reduced more than 10 percent because of temperature and loading as specified in Rule 43”</i></p>		
The pole had a guy wire passing a communication cable with less than a three-inch radial separation. This violation was not documented when AT&T last visited the pole.		

16	Structure ID / Location:	1718250E
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<u>Inadequate Climbing Space</u>		
GO 95, Rule 84.7, Climbing Space, states in part:		
<p><i>“Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors”</i></p>		
The pole had conduits in the climbing space. This violation was not documented when AT&T last visited the pole.		

17	Structure ID / Location:	29101 Silvarado Canyon Rd
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<p><u>Loose Guy Wire</u> GO 95, Rule 86.2, Use, states:</p> <p style="text-align: center;"><i>“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.”</i></p> <p>The pole had a loose guy wire. This violation was not documented when AT&T last visited the pole.</p>		

18	Structure ID / Location:	Pole Located West of Pole Number1033356H
	Previous AT&T Visit Details:	2010
	Date of CPUC Inspection:	February 21-24, 2012
Explanation of Violation(s):		
<p><u>Missing Guy Guard</u> GO 95, Rule 86.9, Guy Marker (Guy Guard), states:</p> <p style="text-align: center;"><i>“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.”</i></p> <p>The pole had an anchor guy without a guy guard. This violation was not documented when AT&T last visited the pole.</p>		