PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



CA2012-009

October 12, 2012

Henry S. Martinez
Technical Operations Manager, Construction
Charter Communications
4781 North Irwindale Avenue
Irwindale, California 91706

SUBJECT: Audit of Charter Communications' San Gabriel Valley Operations System

Dear Mr. Martinez:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Mahmoud Intably and Richard Kyo of my staff conducted an audit of Charter Communications' San Gabriel Valley Operations System from July 31, 2012 to August 3, 2012. The audit included a review of Charter Communications' records and field inspections of Charter Communications' facilities.

During the audit, my staff 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 November 16, 2012 by electronic or hard copy, of all corrective measures taken by Charter Communications to remedy and prevent such violations.

If you have any questions, you can contact Mahmoud Intably at (213) 576-7016 or mahmoud.intably@cpuc.ca.gov.

Sincerely,

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

AUDIT SUMMARY

1	Structure ID / Location:	2430 East Washington Boulevard, Altadena, CA
	Date of Charter Communications last overhead detailed inspection:	April 10, 2012
	Date of CPUC Inspection:	July 31, 2012

Explanation of Violation(s):

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop touching a cable of another communication company. This violation was not documented when Charter Communications inspected the pole.

2	Structure ID / Location:	2445 Woodlyn Road, Pasadena, CA
	Date of Charter Communications last overhead detailed inspection:	Warch 22, 2012
	Date of CPUC Inspection:	July 31, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop touching a cable of another communication company at the midspan. This violation was not documented when Charter Communications inspected the pole.

3	Structure ID / Location:	2135 Orange Grove Avenue, Pasadena, CA
	Date of Charter Communications last overhead detailed inspection:	April 13, 2012
	Date of CPUC Inspection:	July 31, 2012

Broken Lashing Wire

GO 95, Rule 31.1, Maintenance and Inspection, 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 pole supported a broken lashing wire. This violation was not documented when Charter Communications inspected the pole.

4	Structure ID / Location:	1438 North Holliston Avenue, Pasadena, CA
	Date of Charter Communications last overhead detailed inspection:	Not Available
	Date of CPUC Inspection:	July 31, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole supported a broken lashing wire. This violation was not documented when Charter Communications inspected the pole.

5	Structure ID / Location:	201 North Marguerita Avenue, Alhambra, CA
	Date of Charter	
	Communications	January 27, 2012
	last overhead	January 27, 2012
	detailed inspection:	
	Date of CPUC Inspection:	August 1, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop touching a cable of another communication company. This violation was not documented when Charter Communications inspected the pole.

6	Structure ID / Location:	203 North Marguerita Avenue, Alhambra, CA
	Date of Charter	
	Communications	January 27, 2012
	last overhead	January 27, 2012
	detailed inspection:	
	Date of CPUC Inspection:	August 1, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications cable and drip loop touching a cable of another communication. This violation was not documented when Charter Communications inspected the pole.

7	Structure ID / Location:	203 North Marguerita Avenue, Alhambra, CA
	Date of Charter	
	Communications	January 27, 2012
	last overhead	January 27, 2012
	detailed inspection:	
	Date of CPUC Inspection:	August 1, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop touching a cable of another communication company. This violation was not documented when Charter Communications inspected the pole.

8	Structure ID / Location:	305 North Marguerita Avenue, Alhambra, CA
	Date of Charter Communications last overhead detailed inspection:	December 5, 2011
	Date of CPUC Inspection:	August 1, 2012

Abandoned Drop

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.

The pole had abandoned Charter Communications service drops. This violation was not documented when Charter Communications inspected the pole.

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications cable touching a cable of another communication company and triplex drop. This violation was not documented when Charter Communications inspected the pole.

9	Structure ID / Location:	420 East Woodward Avenue, Alhambra, CA
	Date of Charter Communications last overhead detailed inspection:	April 9, 2012
	Date of CPUC Inspection:	August 1, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications cable touching a cable of another communication company. This violation was not documented when Charter Communications inspected the pole.

Broken Lashing Wire

GO 95, Rule 31.1, Maintenance and Inspection, 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 pole supported a Charter Communications span that had a broken lashing wire. This violation was not documented when Charter Communications inspected the pole.

Loose Guy Wire

GO 95, Rule 86.2, Guys, 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.

The pole supported a Charter Communications guy wire that was not taut. This violation was not documented when Charter Communications inspected the pole.

10	Structure ID / Location:	948 East Arroyo Terrace, Alhambra, CA
	Date of Charter Communications last overhead detailed inspection:	April 10, 2012
	Date of CPUC Inspection:	August 1, 2012

Abandoned Drop

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.

The pole had abandoned Charter Communications service drops. This violation was not documented when Charter Communications inspected the pole.

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications cable touching a cable of another communication company. This violation was not documented when Charter Communications inspected the pole.

11	Structure ID / Location:	805 South Chapel Avenue, Alhambra, CA
	Date of Charter	
	Communications	June 9, 2012
	last overhead	Julie 9, 2012
	detailed inspection:	
	Date of CPUC Inspection:	August 1, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications cable touching a guy wire. This violation was not documented when Charter Communications inspected the pole.

12	Structure ID / Location:	827 South Stoneman Avenue, Alhambra, CA
	Date of Charter	
	Communications	March 26, 2012
	last overhead	Watch 20, 2012
	detailed inspection:	
	Date of CPUC Inspection:	August 1, 2012

Obstructed Climbing Space

GO 95, Rule 84.7-E, Allowable Climbing Space Obstructions, states in part:

Vertical conductors, when in a suitable protective covering attached directly to the surface of the pole, terminal boxes or similar equipment which do not extend more than 5 inches from the surface of the pole, and guys, will not be held to obstruct the climbing space...

The pole had a Charter Communications ground wire without protective covering obstructing climbing space. This violation was not documented when Charter Communications inspected the pole.

13	Structure ID / Location:	834 South Garfield Avenue, Alhambra, CA
	Date of Charter	
	Communications	February 3, 2012
	last overhead	rebluary 3, 2012
	detailed inspection:	
	Date of CPUC Inspection:	August 1, 2012

Abandoned Drop

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.

The pole had abandoned Charter Communications service drops. This violation was not documented when Charter Communications inspected the pole.

14	Structure ID / Location:	1805 West Commonwealth Avenue, Alhambra, CA
	Date of Charter	
	Communications	February 6, 2012
	last overhead	rebluary 0, 2012
detailed inspection:		
	Date of CPUC Inspection:	August 1, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop touching a cable of a different communication company. This violation was not documented when Charter Communications inspected the pole.

15	Structure ID / Location:	3016 West Norwood Place, Alhambra, CA
	Date of Charter	
	Communications	February 21, 2012
	last overhead	rebluary 21, 2012
	detailed inspection:	
	Date of CPUC Inspection:	August 1, 2012
	Inspection:	/tuguot 1, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop touching a cable of a different communication. This violation was not documented when Charter Communications inspected the pole.

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a telephone service drop attached to a Charter Communications house attachment. This violation was not documented when Charter Communications inspected the pole.

16	Structure ID / Location:	1333 Primrose Avenue, Alhambra, CA
	Date of Charter	
	Communications	May 7, 2012
	last overhead	
	detailed inspection:	
	Date of CPUC Inspection:	August 1, 2012
	Inspection:	7 (agast 1, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop less than three inches from a cable of a different communication company, and a Charter Communications messenger wire touching a dish satellite of a different communication company. This violation was not documented when Charter Communications inspected the pole.

17	Structure ID / Location:	1517 Freemont Avenue, Alhambra, CA
	Date of Charter	
	Communications	March 27, 2012
	last overhead	March 27, 2012
	detailed inspection:	
	Date of CPUC	August 1, 2012
	Inspection:	3.2.

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop touching a cable of a different communication company. This violation was not documented when Charter Communications inspected the pole.

18	Structure ID / Location:	1616 South 3 rd Street, Alhambra, CA
	Date of Charter	
	Communications	
	last overhead	July 12, 2012
	detailed inspection:	
	Date of CPUC Inspection:	August 1, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop touching a cable of a different communication company. This violation was not documented when Charter Communications inspected the pole.

Damaged Pole Step

GO 95, Rule 31.1, Additional Construction, 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 pole had a damaged step. This violation was not documented when Charter Communications inspected the pole.

19	Structure ID / Location:	2931 Conata Street, Duarte, CA
	Date of Charter	
	Communications	February 25, 2012
	last overhead	
	detailed inspection:	
	Date of CPUC	August 2, 2012
	Inspection:	August 2, 2012

Abandoned Drop

GO 95, Rule 31.6, Abandoned Lines, states in part:

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.

The pole had an abandoned Charter Communications service drop. This violation was not documented when Charter Communications inspected the pole.

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop touching a cable of another communication company. This violation was not documented when Charter Communications inspected the pole.

20	Structure ID / Location:	3189 Fish Canyon Road, Duarte, CA
	Date of Charter Communications last overhead detailed inspection:	July 17, 2012
	Date of CPUC Inspection:	August 2, 2012

Abandoned Drop

GO 95, Rule 31.6, Abandoned Lines, states in part:

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.

The pole had an abandoned Charter Communications service drop. This violation was not documented when Charter Communications inspected the pole.

Missing Ground Moulding

GO 95, Rule 84.6-B, Ground Wires, states in part:

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.

The pole had a Charter Communications ground wire that was not covered by a suitable covering as specified in Rule 22.8-A. This violation was not documented when Charter Communications inspected the pole.

Unsecured Bridled Run

GO 95, Rule 84.6-D, Vertical Runs, states in part:

... Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaces at intervals of not more than 24 inches. ...

The pole had a Charter Communications bridled run that was not secured at intervals not more than 24 inches. This violation was not documented when Charter Communications inspected the pole.

Missing Guy Guard

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.

The pole had a Charter Communications anchor guy without a guy guard. This violation was not documented when Charter Communications inspected the pole.

21	Structure ID / Location:	2038 Broadland Avenue, Duarte, CA
	Date of Charter	
	Communications	December 13, 2012
	last overhead	
	detailed inspection:	
	Date of CPUC Inspection:	August 2, 2012

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a Charter Communications service drop with less than 12 inches of clearance from a cable of another communication company. This violation was not documented when Charter Communications inspected the pole.

Reduced Clearance Between Wires

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. ...

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 ...

The pole had a service drop touching a cable of another communication company. This violation was not documented when Charter Communications inspected the pole.

22	Structure ID / Location:	304 Virginia Avenue, Azuza, CA
	Date of Charter	
	Communications	January 4, 2012
	last overhead	January 4, 2012
	detailed inspection:	
	Date of CPUC Inspection:	August 2, 2012

Broken Lashing Wire

GO 95, Rule 31.1, Maintenance and Inspection, 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 pole supported a Charter Communications span that had a broken lashing wire. This violation was not documented when Charter Communications inspected the pole.

23	Structure ID / Location:	777 East Villa Street, Pasadena, CA
	Date of Charter	
	Communication last	February 4, 2012
	underground	Febluary 4, 2012
	detailed inspection:	
	Date of CPUC	hulu 24, 2042
	Date of CPUC Inspection:	July 31, 2012

Missing Ground Wire

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.

The handhole had an amplifier which was not grounded (missing ground wire) as required by Charter Communications. This violation was not documented when Charter Communications inspected the structure.

Unbolted Cover

GO 128, Rule 42.7, Covers, states:

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 handhole was not properly secured against entry by unauthorized persons (unbolted cover). This violation was not documented when Charter Communications inspected the structure.

24	Structure ID / Location:	276 S El Molino Ave Pasadena, CA
	Date of Charter Communication last underground detailed inspection:	January 19, 2012
	Date of CPUC Inspection:	July 31, 2012

Missing Ground Wire

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.

The handhole had an amplifier which was not grounded (missing ground wire) as required by Charter Communications. This violation was not documented when Charter Communications inspected the structure.

Unbolted Cover

GO 128, Rule 42.7, Covers, states:

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 handhole was not properly secured against entry by unauthorized persons (unbolted cover). This violation was not documented when Charter Communications inspected the structure.