

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 10, 2012

CA2012-015

Joe Schoenstein
Division President
Bright House Networks
3701 North Sillect Avenue
Bakersfield, California 93308

SUBJECT: Audit of Bright House Networks

Dear Mr. Schoenstein:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Koko Tomassian and Richard Kyo of my staff conducted an audit of Bright House Networks (BHN) from November 13, 2012 to November 16, 2012. The audit included a review of BHN's records and field inspections of BHN's 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 January 18, 2013, by electronic or hard copy, of all corrective measures taken by BHN to remedy and prevent such violations.

If you have any questions, you can contact Koko Tomassian at (213) 576-7099 or koko.tomassian@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

AUDIT SUMMARY

Company: Bright House Networks

CIP Audit Date: November 13 to November 16, 2012

1.	Location:	Bakersfield
	Date of CPUC Inspection:	11/13/12
Explanation of Violation(s):		
<u>Inspection & Maintenance Program Deficiencies</u>		
<p>GO 95, Rule 80.1A-2, Statewide Inspection Requirements, states in part:</p> <p style="text-align: center;"><i>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. Consistent with Rule 31.2, the type, frequency, and thoroughness of inspections shall be based upon...</i></p> <p>GO 128, Rule 12.2, Design, Construction, and Maintenance, states in part:</p> <p style="text-align: center;"><i>Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.</i></p> <p>GO 128, Rule 17.2, Inspection, states:</p> <p style="text-align: center;"><i>Systems shall be inspected by the operator frequently and thoroughly for the purpose of ensuring [sic] that they are in good condition and in conformance with all applicable requirements of these rules.</i></p> <p>BHN does not currently have inspection or maintenance procedures in place that encompass all of its overhead and underground facilities. The frequency of inspections must be determined by BHN at a level adequate enough to ensure that your facilities are in good condition and in compliance with GOs 95 and 128.</p>		

2.	Location:	710 Sequoia, Alley S/O Decatur
Previous Bright House Visit Details:		N/A
Date of CPUC Inspection:		November 14, 2012
Explanation of Violation(s):		
<p data-bbox="191 562 571 596"><u>Insufficient Climbing Space</u></p> <p data-bbox="191 600 821 634">GO 95, Rule 84.7, Climbing Space, states in part:</p> <p data-bbox="321 672 1253 743"><i>Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors...</i></p> <p data-bbox="191 785 1438 856">The pole had a communications conductor wrapped around it which was obstructing the climbing space.</p> <p data-bbox="191 894 724 928"><u>Service Drop Hanging Down from Pole</u></p> <p data-bbox="191 932 1123 966">GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p data-bbox="321 1003 1367 1150"><i>Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the condition under which they are to be operated, to enable the furnishing of safe, proper, and adequate service...</i></p> <p data-bbox="191 1188 535 1222"><u>Abandoned Service Drop</u></p> <p data-bbox="191 1226 844 1260">GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p data-bbox="321 1297 1341 1411"><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...</i></p> <p data-bbox="191 1449 1380 1482">The pole had a service drop that is no longer in service and was hanging down from the pole.</p>		

3.	Location:	Corner of Sequoia and Decatur
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p data-bbox="188 562 500 594"><u>Exposed Ground Wire</u></p> <p data-bbox="188 598 1123 630">GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p data-bbox="321 672 1367 814"><i>Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the condition under which they are to be operated, to enable the furnishing of safe, proper, and adequate service...</i></p> <p data-bbox="188 856 1390 924">The ground molding on the pole was broken/damaged resulting in insufficient covering of the ground wire at a distance of 7 feet or less from the ground.</p>		

4.	Location:	808 Sequoia, Next to Alley
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p><u>Exposed Ground Wire</u> GO 95, Rule 31.1, Design, Construction, and Maintenance, 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 condition under which they are to be operated, to enable the furnishing of safe, proper, and adequate service...</i></p> <p>The ground molding on the pole was broken/damaged resulting in insufficient covering of the ground wire at a distance of 7 feet or less from the ground.</p> <p><u>Insufficient Clearance Between Communication Cables of Different Ownership</u> GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p style="text-align: center;"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p>The vertical clearance between a BHN cable and other CIP cables was less than 12 inches.</p> <p><u>Insufficient Climbing Space</u> GO 95, Rule 84.7, Climbing Space, states in part:</p> <p style="text-align: center;"><i>Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors...</i></p> <p>The pole had a BHN riser obstructing the climbing space.</p> <p><u>Abandoned Power Supply</u> GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p style="text-align: center;"><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...</i></p> <p>The pole supported a power supply cabinet that is no longer in use.</p>		

5.	Location:	150' W/O Jeffery, E/O Union
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p data-bbox="188 562 727 596"><u>Service Drop Hanging Down from Pole</u></p> <p data-bbox="188 600 1123 634">GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p data-bbox="321 672 1367 814"><i>Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the condition under which they are to be operated, to enable the furnishing of safe, proper, and adequate service...</i></p> <p data-bbox="188 856 535 890"><u>Abandoned Service Drop</u></p> <p data-bbox="188 894 844 928">GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p data-bbox="321 966 1341 1075"><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...</i></p> <p data-bbox="188 1117 1380 1150">The pole had a service drop that is no longer in service and was hanging down from the pole.</p>		

6.	Location:	S/E Corner of Miner & Union
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<u>Insufficient Clearance Between Communication Cables of Different Ownership</u>		
<p>GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p style="text-align: center;"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p>The vertical clearance between a BHN cable and other CIP cables was less than 12 inches.</p>		

7.	Location:	2701 Wenatchee Ave.
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<u>Insufficient Climbing Space</u>		
<p>GO 95, Rule 84.7, Climbing Space, states in part:</p> <p style="text-align: center;"><i>Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors...</i></p> <p>The pole had a communications conductor wrapped around it which was obstructing the climbing space.</p>		

8.	Location:	2801 Wenatchee Ave.
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p data-bbox="191 562 1269 594"><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></p> <p data-bbox="191 636 812 667">GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p data-bbox="321 709 1339 814"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p data-bbox="191 856 1344 888">The vertical clearance between a BHN cable and other CIP cables was less than 12 inches.</p> <p data-bbox="191 930 535 961"><u>Abandoned Service Drop</u></p> <p data-bbox="191 972 844 1003">GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p data-bbox="321 1045 1339 1150"><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...</i></p> <p data-bbox="191 1192 1351 1224">The pole had two abandoned service drops (one attached to pole and the other at midspan).</p>		

9.	Location:	2813 Wenatchee Ave.
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p><u>Abandoned Service Drop</u> GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p style="text-align: center;"><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...</i></p> <p>The pole had an abandoned service drop.</p>		

10.	Location:	Hosking and South H St.
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p><u>Exposed Ground Wire</u> GO 95, Rule 31.1, Design, Construction, and Maintenance, 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 condition under which they are to be operated, to enable the furnishing of safe, proper, and adequate service...</i></p> <p>The ground molding on the pole was broken/damaged resulting in insufficient covering of the ground wire at a distance of 7 feet or less from the ground.</p>		

11.	Location:	Tree Line Ave. and South H St.
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p data-bbox="204 575 618 611"><u>Jointly Used Pole Not Stepped</u></p> <p data-bbox="204 648 1122 684">GO 95, Rule 91.3-A1, Poles with Vertical Runs or Risers, states in part:</p> <p data-bbox="337 724 1333 795"><i>All jointly used poles which support supply conductors shall be provided with pole steps if vertical runs or risers are attached to the surface of such poles...</i></p> <p data-bbox="204 835 1130 871">The jointly used pole which contained an attached riser was not stepped.</p> <p data-bbox="204 911 505 947"><u>Broken “Riser Strap”</u></p> <p data-bbox="204 987 1130 1022">GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="337 1062 1325 1205"><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="204 1245 854 1281">The pole had a broken and unsecured “riser strap.”</p>		

12.	Location:	920 McKee
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p data-bbox="204 575 1284 611"><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></p> <p data-bbox="204 648 829 684">GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p data-bbox="337 722 1354 831"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p data-bbox="204 869 1360 905">The vertical clearance between a BHN cable and other CIP cables was less than 12 inches.</p> <p data-bbox="204 942 1419 978"><u>Insufficient Clearance Between Communication Conductor and Electric Down Guy Wire</u></p> <p data-bbox="204 1016 846 1052">GO 95, Rule 38, Table 2, Case 19C, requires that:</p> <p data-bbox="298 1089 1357 1163"><i>Guys and span wires passing communication conductors (including service drops) supported on the same pole must maintain a three (3) inch radial separation.</i></p> <p data-bbox="204 1201 1084 1236">The pole had a communication conductor in contact with a guy wire.</p>		

13.	Location:	7821 Wible
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p><u>Abandoned Service Drop</u> GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p style="text-align: center;"><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...</i></p> <p>The pole had an abandoned service drop.</p>		

14.	Location:	2608 Auburn Ct.
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p><u>Broken Pedestal</u> GO 128, Rule 17.1, Design, Construction and Maintenance, 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 furnishing of safe, proper, and adequate service.</i></p> <p>The pedestal box was not properly maintained for its intended use (broken).</p>		

15.	Location:	2620 Auburn Ct.
	Previous Bright House Visit Details:	N/A
	Date of CPUC Inspection:	November 14, 2012
Explanation of Violation(s):		
<p data-bbox="204 575 431 606"><u>Broken Pedestal</u></p> <p data-bbox="204 613 1149 644">GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="337 684 1333 827"><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 furnishing of safe, proper, and adequate service.</i></p> <p data-bbox="204 871 1174 903">The pedestal box was not properly maintained for its intended use (broken).</p>		