

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 3, 2015

CA2014-015

Ross Johnson  
Area Manager, Regulatory  
AT&T  
525 Market Street  
19<sup>th</sup> Floor, #33  
San Francisco, CA 94015-2727

Subject: Audit of AT&T's Valley Region

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Ivan Garcia and Jamie Lau of my staff conducted an audit of AT&T's Valley Region on November 10-14, 2014. The audit included a review of AT&T's maintenance records and inspections of AT&T's facilities.

During 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 July 6, 2015, 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, Ivan Garcia of my staff at (916) 928-5875 or [ivan.garcia@cpuc.ca.gov](mailto:ivan.garcia@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Fadi Day".

Fadi Day, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosures: CPUC Audit Summary

Cc : Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC  
Ivan Garcia, Utilities Engineer, CPUC  
Jamie Lau, Utilities Engineer, CPUC  
Alok Kumar, Senior Utilities Engineer, Supervisor CPUC

## AUDIT FINDINGS

|           |  |                        |
|-----------|--|------------------------|
| <b>1.</b> | <b>Location:</b>   | <b>Valley Division</b> |
|           | <b>Date Visited by CPUC:</b>   | 11/17/2014-11/19/2014  |
|           | <b>Explanation of Violation(s):</b>  |                        |
|           | <b><u>Inspection &amp; Maintenance Program Deficiencies</u></b>  |                        |
|           | <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>AT&amp;T does not frequently and thoroughly inspect its facilities and document all GO 128 violations, and does not perform inspections that encompass all underground lines. The frequency of inspections must be determined by AT&amp;T at a level adequate enough to ensure that your facilities are in good condition and in compliance with GO 128. AT&amp;T's current inspection program does not meet the GO 128, Rule17.2.</p> |                        |

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| <b>2.</b> | <b>Location:</b>   | <b>Valley Division</b> |
|           | <b>Date Visited by CPUC:</b>   | 11/17/2014-11/19/2014  |
|           | <b>Explanation of Violation(s):</b>  |                        |
|           | <b><u>Preservation of Records Issue</u></b>  |                        |
|           | <p>GO 95, Rule 18A1b, Resolution of Safety Hazard and General Order 95 Nonconformances, states:</p> <p style="text-align: center;"><i>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.</i></p> <p>AT&amp;T staff stated that some records may be only retained for five (5) years in the electronic system.</p> |                        |

The following violations were not documented and/or addressed by AT&T during its last detailed inspection as required by General Order 95:

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| <b>3.</b>  | <b>Location:</b>                   | 765 Pine St., Pacific Grove |
|  | <b>Previous Visit by AT&amp;T:</b> | 11/12/2014                  |
|  | <b>Date Visited by CPUC:</b>       | 11/18/2014                  |
| <b>Explanation of Violation(s):</b>  |                                    |                             |
| <b><u>Inadequate Clearance Between AT&amp;T and Comcast cables</u></b>   |                                    |                             |
| <p>GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <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 ...</i></p> <p>Table 2, Column C, Case 8, requires the minimum vertical separation between two communication wires at midspan to be 12 inches. A Comcast service drop serving 765 Pine St. was in contact with an AT&amp;T cable at approximately the midspan.</p> |                                    |                             |

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| <b>4.</b>   | <b>Location:</b>                   | 413 Wood St., Pacific Grove |
|   | <b>Previous Visit by AT&amp;T:</b> | 11/10/2014                  |
|   | <b>Date Visited by CPUC:</b>       | 11/18/2014                  |
| <b>Explanation of Violation(s):</b>   |                                    |                             |
| <b><u>Inadequate Clearance Between AT&amp;T and Comcast cables</u></b>  |                                    |                             |
| <p>GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <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 ...</i></p> <p>Table 2, Column C, Case 8, requires the minimum vertical separation between two communication wires on the same pole to be 12 inches. A Comcast service drop serving 414 Wood St. was in contact with an AT&amp;T cable.</p> |                                    |                             |



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| 5.  | <b>Location:</b>                   | 314 Bishop Ave., Pacific Grove |
|   | <b>Previous Visit by AT&amp;T:</b> | 11/11/2014                     |
|   | <b>Date Visited by CPUC:</b>       | 11/18/2014                     |
| <b>Explanation of Violation(s):</b>   |                                    |                                |
| <b><u>Low Vertical Clearance</u></b>  |                                    |                                |
| GO 95, Rule 84.8-C1, Above Public Thoroughfares, states in part:  |                                    |                                |
| <p style="text-align: center;"><i>Vertical clearance shall not be less than 18 feet. <b>EXCEPTION:</b> Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line.</i></p> |                                    |                                |
| The above ground clearance of an AT&T service drop to 308 Bishop Ave. was 12 feet, 6 inches at the curb line.   |                                    |                                |

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| 6.  | <b>Location:</b>                   | 1057 Amador Ave., Seaside |
|   | <b>Previous Visit by AT&amp;T:</b> | 10/18/2014                |
|   | <b>Date Visited by CPUC:</b>       | 11/18/2014                |
| <b>Explanation of Violation(s):</b>   |                                    |                           |
| <b><u>Inadequate Clearance Between AT&amp;T and Comcast cables</u></b>  |                                    |                           |
| 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 ...</i></p>  |                                    |                           |
| Table 2, Column C, Case 8, requires the minimum vertical separation between two communication conductors on the same pole to be 12 inches. A Comcast service drop serving 1057 Amador Ave. was in contact with an AT&T cable near the point of attachment at the house. |                                    |                           |

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| 7.  | <b>Location:</b>                   | 1731 Baker St., Seaside |
|   | <b>Previous Visit by AT&amp;T:</b> | 10/27/2014              |
|   | <b>Date Visited by CPUC:</b>       | 11/18/2014              |
| <b>Explanation of Violation(s):</b>   |                                    |                         |
| <b><u>AT&amp;T Cable Exposed Along Pole</u></b>   |                                    |                         |
| GO 95, Rule 87.7D1ab, Risers Covered from Ground Level to 8 Feet above the Ground, states in part:  |                                    |                         |
| <p style="text-align: center;"><i>Risers shall be protected from the ground level to a level not less than 8 feet above the ground by: Securely or effectively grounded iron or steel pipe or Non-metallic conduit or rigid U-shaped molding.</i></p> |                                    |                         |
| The riser at this pole did not have a riser cover from ground level to at least 8 feet.   |                                    |                         |

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| 8.   | <b>Location:</b>                   | 6 Carlton Dr., Del Rey Oak |
|  | <b>Previous Visit by AT&amp;T:</b> | 11/12/2014                 |
|  | <b>Date Visited by CPUC:</b>       | 11/18/2014                 |
| <b>Explanation of Violation(s):</b>  |                                    |                            |
| <b><u>Inadequate Clearance Between AT&amp;T and Comcast cables</u></b>   |                                    |                            |
| 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 ...</i></p>   |                                    |                            |
| Table 2, Column C, Case 8, requires the minimum vertical separation between two communication conductors on the same pole to be 12 inches. An AT&T service drop serving 8 Carlton Dr. was in contact with a Comcast service drop near the pole.            |                                    |                            |
| <b><u>AT&amp;T Conductor and Cable TV Conductor In Contact</u></b>   |                                    |                            |
| 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 ...</i></p>   |                                    |                            |
| Table 2, Column C, Case 8, requires the minimum vertical clearance between two communication conductors on the same pole and in adjoining midspans to be 12 inches. AT&T's communication conductor and cable TV's conductor are in contact at the midspan. |                                    |                            |

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| <b>9.</b>   | <b>Location:</b>                   | 929 Williams Road, Salinas |
|   | <b>Previous Visit by AT&amp;T:</b> | 2014                       |
|   | <b>Date Visited by CPUC:</b>       | 11/19/2014                 |
| <b>Explanation of Violation(s):</b>   |                                    |                            |
| <b><u>Abandoned AT&amp;T Cables</u></b>   |                                    |                            |
| GO 95, Rule 31.6, Abandoned Lines, states in part:  |                                    |                            |
| <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> |                                    |                            |
| There were two abandoned AT&T service drops to this address.  |                                    |                            |

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| <b>10.</b>   | <b>Location:</b>                   | Pole at end of the driveway at 1091 Old Stage Road, Salinas |
|  | <b>Previous Visit by AT&amp;T:</b> | 2014  |
|  | <b>Date Visited by CPUC:</b>       | 11/19/2014  |
| <b>Explanation of Violation(s):</b>  |                                    |   |
| <b><u>AT&amp;T Service Drop Contact Of Roof</u></b>  |                                    |   |
| GO 95, Rule 84.8C4, Clearances Above Ground and Buildings From Buildings and Structures, states in part:   |                                    |   |
| <p style="text-align: center;"><i>The vertical clearance above buildings on premises other than the one being served shall not be less than 8 feet, except that a reduction to not less than 2 feet.</i></p> |                                    |   |
| The AT&T service drop at this pole is in contact with a flat rooftop of a structure that it is not serving. (A trailer at 1238 Old Stage Road)   |                                    |   |



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| <b>11.</b>  | <b>Location:</b>                   | 1st pole at driveway at 1091 Old Stage Road, Salinas |
|   | <b>Previous Visit by AT&amp;T:</b> | 2014   |
|   | <b>Date Visited by CPUC:</b>       | 11/19/2014   |
| <b>Explanation of Violation(s):</b>   |                                    |  |
| <b><u>Abandoned AT&amp;T Cables</u></b>   |                                    |  |
| GO 95, Rule 31.6, Abandoned Lines, states in part:  |                                    |  |
| <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> |                                    |  |
| There were two abandoned AT&T service drops to this address.  |                                    |  |

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| <b>12.</b>  | <b>Location:</b>                   | 2nd pole at driveway at 1091 Old Stage Road, Salinas |
|   | <b>Previous Visit by AT&amp;T:</b> | 2014   |
|   | <b>Date Visited by CPUC:</b>       | 11/19/2014   |
| <b>Explanation of Violation(s):</b>   |                                    |  |
| <b><u>AT&amp;T Span In Contact with Cable TV Down Guy</u></b>   |                                    |  |
| GO 95, Rule 86.4, Clearance From Conductors Passing on Same Poles, states in part:  |                                    |  |
| <p style="text-align: center;"><i>The radial clearances between guys and conductors supported by or attached to the same poles or cross arms shall be not less than as specified in <a href="#">Table 2, Case 19</a> except that the clearance between guys and communication messenger and/or cable attached directly to surface of pole may be less than the 3 inches specified in <a href="#">Table 2, Case 19, Column C</a></i></p> |                                    |  |
| An AT&T cable is in contact with a Comcast down guy wire.   |                                    |  |

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| 13.  | <b>Location:</b>                   | 1046 E. Laurel St., Salinas |
|  | <b>Previous Visit by AT&amp;T:</b> | 2014                        |
|  | <b>Date Visited by CPUC:</b>       | 11/20/2014                  |
| <b>Explanation of Violation(s):</b>  |                                    |                             |
| <b><u>AT&amp;T Service Drop In Contact With Cable TV Service Drop</u></b>  |                                    |                             |
| <p>GO 95, Rule 38, Minimum Clearance of Wires from Other Wires, states in part:</p> <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 ...</i></p> <p>Table 2, Column C, Case 8, requires the minimum vertical separation between two communication service drops to be 12 inches. The AT&amp;T service drop was in contact with a Comcast service drop.</p> |                                    |                             |

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| 14.   | <b>Location:</b>                   | 21777 Harris Rd., Salinas |
|   | <b>Previous Visit by AT&amp;T:</b> | 2014                      |
|   | <b>Date Visited by CPUC:</b>       | 11/20/2014                |
| <b>Explanation of Violation(s):</b>   |                                    |                           |
| <b><u>AT&amp;T Service Drop In Contact With Cable TV Service Drop</u></b>   |                                    |                           |
| <p>GO 95, Rule 84.8C1, , states in part:</p> <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 ...</i></p> <p>Table 2, Column C, Case 8, requires the minimum vertical separation between two communication service drops to be 12 inches. The AT&amp;T service drop was in contact with a Comcast service drop.</p> |                                    |                           |



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| 15.   | <b>Location:</b>                   | Span at driveway at 21777 Harris Rd., Salinas |
|   | <b>Previous Visit by AT&amp;T:</b> | 2014  |
|   | <b>Date Visited by CPUC:</b>       | 11/20/2014                                    |
| <b>Explanation of Violation(s):</b>   |                                    |   |
| <b><u>Low Vertical Clearance On AT&amp;T Conductor Span</u></b>   |                                    |   |
| <p>GO 95, Rule 84.4A6, Above Ground Clearances Across or along Public Thoroughfares, states in part:</p> <p><i>Communication conductors over or across public thoroughfares shall have a clearance of 18 feet above ground (<a href="#">Table 1, Case 3, Column B</a>). A reduced clearance to 16 feet is permitted for the portions of communication conductors where no part of the line overhangs any part of the thoroughfare which is ordinarily traveled, or where the line is behind an established curb, ditch or berm that serves to protect such communication conductors from encroachment by vehicular traffic.</i></p> <p>The above ground clearance of the AT&amp;T cable was 13 feet at this location.</p> |                                    |   |

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| 15.  | <b>Location:</b>                   | Span at parking lot at 21777 Harris Rd., Salinas |
|  | <b>Previous Visit by AT&amp;T:</b> | 2014   |
|  | <b>Date Visited by CPUC:</b>       | 11/20/2014                                       |
| <b>Explanation of Violation(s):</b>  |                                    |  |
| <b><u>Low Vertical Clearance On AT&amp;T Conductor Span</u></b>  |                                    |  |
| <p>GO 95, Rule 84.4A6, Above Ground Clearances Across or along Public Thoroughfares, states in part:</p> <p><i>Communication conductors over or across public thoroughfares shall have a clearance of 18 feet above ground (<a href="#">Table 1, Case 3, Column B</a>). A reduced clearance to 16 feet is permitted for the portions of communication conductors where no part of the line overhangs any part of the thoroughfare which is ordinarily traveled, or where the line is behind an established curb, ditch or berm that serves to protect such communication conductors from encroachment by vehicular traffic.</i></p> <p>The aboveground clearance of the AT&amp;T cable was 14 feet, 5 inches at this location.</p> |                                    |  |

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| 16. | <b>Location:</b>  | 502 Echo Valley Rd., Salinas |
|     | <b>Previous Visit by AT&amp;T:</b>  | 2014                         |
|     | <b>Date Visited by CPUC:</b>  | 11/20/2014                   |
|     | <b>Explanation of Violation(s):</b>   |                              |
|     | <p><b><u>PG&amp;E Service Drop Radial Clearance From AT&amp;T Conductor</u></b></p> <p>GO 95, Rule 84.4C, Clearances Between Conductors, states in part:</p> <p><i>"Table 2, Case 4C, states the minimum allowable clearance between a supply conductor and communication conductor shall be no less than 48 inches"</i></p> <p>The radial clearance between AT&amp;T cable and PG&amp;E service drop at this location was less than 48 inches.</p> |                              |