

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 30, 2015

CA2015-010

Mr. Ross Johnson
Area Manager, Regulatory
AT&T
430 Bush Street, Suite #105
San Francisco, CA 94108

SUBJECT: Audit of AT&T Trinity Region

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ivan Garcia of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T Trinity Region on September 1-3, 2015. The audit included a review of AT&T's records and field inspections of AT&T's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than February 1, 2016 by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

If you have any questions concerning this audit please contact Ivan Garcia at (916) 928-5875 or ivan.garcia@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Fadi Daye".

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

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC
Charlotte TerKeurst, Program Manager, Safety and Enforcement Division, CPUC
Alok Kumar, Senior Utilities Engineer (Supervisor), ESRB, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- a. 2015 detailed inspection records for facilities located in AT&T's Trinity Region
- b. AT&T's 2015 completed work orders resulting from field inspections located in Trinity Region.
- c. Construction records and pole loading calculations for two cable replacement projects in Trinity region completed in 2013 and 2014.

II. Records Review - Violations

GO 128, Rule 17.2 - Inspection, states:

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 these rules.

AT&T does not frequently and thoroughly inspect all of its underground facilities and address all GO 128 violations. AT&T's current inspection program does not encompass all of its underground facilities. AT&T only inspects nearby underground facilities when reporting to a troubled location.

Field Inspection

My staff inspected the following facilities:

Structure Number	Type of Structure	Approximate Location
1	Pole	Henrietta and Trinity Dam Blvd., Lewiston
1x	Pole	Henrietta and Trinity Dam Blvd., Lewiston
1B5	Pole	4720 Trinity Dam Blvd., Lewiston
5	Pole	4720 Trinity Dam Blvd., Lewiston
P2B2-5	Pole	20 Wellock Rd., Lewiston
N/A	Pole	280 Lockhart Ranch Rd., Lewiston
1	Pole	8460 Rush Creek Rd., Lewiston
11-5	Pole	7960 Rush Creek Rd., Lewiston
11	Pole	7960 Rush Creek Rd., Lewiston
11-7	Pole	7960 Rush Creek Rd., Lewiston
12	Pole	7960 Rush Creek Rd., Lewiston
12-B6	Pole	7960 Rush Creek Rd., Lewiston
13	Pole	7960 Rush Creek Rd., Lewiston
14	Pole	7960 Rush Creek Rd., Lewiston
9	Pole	Deadwood Rd. and Hatchery Rd., Lewiston
10	Pole	Deadwood Rd. and Hatchery Rd., Lewiston
11	Pole	Deadwood Rd. and Hatchery Rd., Lewiston
12	Pole	Deadwood Rd. and Hatchery Rd., Lewiston
13	Pole	Deadwood Rd. and Hatchery Rd., Lewiston.
13B2	Pole	Deadwood Rd. and Hatchery Rd., Lewiston
14	Pole	Deadwood Rd. and Hatchery Rd., Lewiston
15	Pole	Deadwood Rd. and Hatchery Rd., Lewiston

III. Field Inspection – Undocumented Violations List

We observed the following violations during the field inspection. None of these violations were documented and/or addressed by AT&T during its last inspections:

GO 95, Rule 31.6 – Abandoned Lines, requires 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.

Pole 1B5 had an abandoned drop.

GO 95, Rule 86.2 – Guy Use, requires that guys shall be maintained taut.

The AT&T communication down guy on pole 12-B6 was slack and not taut.

GO 95, Rule 87.7 D(1)(b) – Risers Covered from Ground Level to 8 Feet above the Ground, requires risers to be protected from the ground level to a level not less than 8 feet above the ground by a non-metallic conduit or, rigid U-shape moulding.

AT&T's vertical run on pole number 10 on Deadwood Rd and Hatchery Rd. was exposed from the ground.

GO 95, Rule 84.6 D – Vertical Runs, requires vertical runs to be supported by bridle hooks or rings spaced at intervals of not more than 24 inches.

The vertical run on pole number 10 was missing a U-shape moulding and bridle hooks or rings along the pole.