

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 19, 2016

CA2016-017

Mr. Deane Leavenworth
Vice President, Government Affairs
Charter Communications
1127 11th Street, Suite 950
Sacramento, CA 95814

SUBJECT: Audit of Time Warner Cable's (TWC) Metro Division

Dear Mr. Leavenworth:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Zelalem Ewnetu of my staff conducted a Communication Infrastructure Provider (CIP) audit of TWC's Metro Division from September 19, 2016 to September 23, 2016. The audit included a review of TWC's inspection and maintenance records and field inspection of TWC's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than January 20, 2017, by electronic or hard copy, of all corrective measures taken by TWC to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Zelalem Ewnetu at (213) 576-7042 or zelalem.ewnetu@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink 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
Lee Palmer, Deputy Director, Office of Utility Safety, SED
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC
Stephen D. Sawyer, Director, Government Affairs, Charter Communications
Al Ruiz, Construction Manager – Zone 6 Metro, Charter Communications

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Most recently completed pole loading records for pole construction and pole reconstruction (i.e. the addition of facilities to existing poles).
- Third party safety hazard notifications, including those sent to and received from third party utilities.
- TWC's inspection program, which includes the following items: intervals of inspection, inspector qualifications, and priority system for resolving GO nonconformances and safety hazards.

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 95, Rule 31.2, Inspection of Lines, states in part:

Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules.

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

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.

GO 95, Rule 80.1-A3, Definitions, states in part:

Patrol Inspections. For the purpose of this rule, Patrol Inspection shall be defined as a simple visual inspection, of applicable communications facilities, equipment and structures that is designed to identify obvious structural problems and hazards. Patrol inspections may be carried out in the course of other company business.

TWC has a quarterly "CLI Drive-Outs" that are used for both signal leak detection and to comply with the patrol inspection requirements of GO 95, Rules 31.2 and 80.1-A2. The CLI Drive-Outs are the only routine inspections that TWC performs of its facilities; while the CLI Drive-Outs may be practicable for vehicle accessible areas, they would not be appropriate for TWC facilities located on private properties and other inaccessible areas, where walkouts to these facilities may be necessary. Therefore, TWC does not inspect its overhead facilities frequently and thoroughly as required by GO 95, Rules 31.2 and 80.1-A2.

III. Field Inspection

My staff inspected the following facilities during the field inspection:

Structure Number (Location)	Type of Structure	City
1445341E	Pole	Culver City
821276E	Pole	Culver City
1261140E	Pole	Culver City
4414654E	Pole	Culver City
821274E	Pole	Culver City
1727301E	Pole	Culver City
1727302E	Pole	Culver City
336603E	Pole	Culver City
421495E	Pole	Los Angeles
412496	Pole	Los Angeles
421411E	Pole	Los Angeles
421412E	Pole	Los Angeles
394425E	Pole	Los Angeles
261306M	Pole	Los Angeles
167661M	Pole	Los Angeles
167360M	Pole	Los Angeles
613704H	Pole	Los Angeles
164067M	Pole	Los Angeles
720857H	Pole	Los Angeles
Lilian/Willoughby	Pole	Los Angeles
298592M	Pole	Marina Del Rey
267695M	Pole	Marina Del Rey
267694M	Pole	Marina Del Rey
298484M	Pole	Marina Del Rey
257884M	Pole	Marina Del Rey
257884M	Pole	Marina Del Rey
391394M	Pole	Marina Del Rey
285858M	Pole	Marina Del Rey
298161M	Pole	Marina Del Rey
168573M	Pole	Gardena
414424M	Pole	Gardena
106843M	Pole	Gardena
106842M	Pole	Gardena
106841M	Pole	Gardena
106840M	Pole	Gardena
106839M	Pole	Gardena

107160M	Pole	Gardena
89634M	Pole	Los Angeles
Wadsworth/Vernon(south alleyway)	Pole	Los Angeles
748405H	Pole	Los Angeles
369285M	Pole	Los Angeles
269295M	Pole	Los Angeles
369295M	Pole	Los Angeles
368511M	Pole	Los Angeles
16 Driftwood St	Pole	Venice
12820 Loganberry Dr	Pole	La Mirada
11204 Grayridge Dr	Pole	Culver City
9310 Kalmia St	Pole	Los Angeles
855 W 32 nd St	Pole	Los Angeles
1548 E Martin Luther King Bl	Pole	Los Angeles
6534 Hayes Dr	Vault	Los Angeles
739 Schumaker Dr	Vault	Los Angeles
907 Schumaker Dr	Vault	Los Angeles
6282 Commodore Sloat Dr	Vault	Los Angeles
6222 San Vicente Bl	Vault	Los Angeles
6275 Commodore Sloat Dr	Vault	Los Angeles
920 Carrillo Dr	Vault	Los Angeles
954 Commodore Sloat Dr	Pedestal	Los Angeles

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection.

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 TWC communication service drops supported on poles numbered 336603E (11th and Hoover, Los Angeles) and 421411E were abandoned and no longer in service, with no foreseeable future use.

The TWC ground wire and molding supported on pole number 369285M were abandoned and no longer in service, with no foreseeable future use.

GO 95, Rule 31.1, 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.

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

Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.

The TWC ground molding supported on pole number 369295M was damaged.

GO 128, Rule 42.7, Covers, states in part:

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 (Also See Rule 17.8 and Appendix B, Figure 9).

The TWC vaults and pedestals at the following locations (which TWC personnel opened without tools) were not securely locked.

- 6534 Hayes Dr—Los Angeles
- 739 Schumaker Dr—Los Angeles

- 907 Schumaker Dr—Los Angeles
- 6282 Commodore Sloat Dr—Los Angeles
- 6222 San Vicente Bl—Los Angeles
- 6275 Commodore Sloat Dr—Los Angeles
- 920 Carrillo Dr—Los Angeles
- 954 Commodore Sloat Dr—Los Angeles