

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 19, 2017

CA2017-752

Mr. John Gutierrez
Senior Director – Government Affairs
Comcast Cable
3055 Comcast Place
Livermore, CA 94551

SUBJECT: Audit of Comcast's Delta Valley Region

Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Wilson Tsai of my staff conducted a Communication Infrastructure Provider (CIP) audit of Comcast's Delta Valley Region from May 15, 2017 to May 19, 2017. The audit included a review of Comcast's records and a field inspection of Comcast'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 August 21, 2017, by electronic or hard copy, of all corrective measures taken by Comcast to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Wilson Tsai at (415) 703-1359 or wilson.tsai@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, CPUC
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC
Wilson Tsai, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Comcast's GO 95/128 inspection program
- Work order records for 2016 & 2017
- Inspection Drive Out Maps
- Pole loading calculations

II. Records Violations

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

Lines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.

Comcast does not frequently and thoroughly inspect its facilities. Comcast only conducts inspections when responding to service requests and only the inspections consist of inspection of poles one span away from the service location.

GO 95, Rule 80.1-A.4, Record Keeping, states in part:

Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a).

Comcast's inspection program does not include auditable records that identify the date of inspections, results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and personnel who performed each corrective action.

III. Field Inspection

During the field inspection, my staff inspected the following facilities:

Structure Number	Structure Type	Address	City
110350695	Pole	End of Byrd Ln.	Pleasanton
	Pole	1019 Byrd Ln.	Pleasanton
110158505	Pole	Alisal St. & Byrd Ln.	Pleasanton
110164823	Pole	999 E. Mockingbird Ln.	Pleasanton
110289156	Pole	1 Pole W/O 999 E. Mockingbird Ln.	Pleasanton
110164819	Pole	Laura Ln. & E. Mockingbird Ln.	Pleasanton
110164825	Pole	E. Mockingbird Ln. & Alisal St.	Pleasanton
110395632	Pole	6306 Alisal St.	Pleasanton
	Pole	6352 Alisal St.	Pleasanton
110158577	Pole	6639 Alisal St.	Pleasanton
110289157	Pole	Alisal St. & Alisal Ct.	Pleasanton
	Pole	Alisal St. & Alisal Ct.	Pleasanton
110164875	Pole	6656 Alisal St.	Pleasanton
110266842	Pole	1600 Broadway St.	Concord
110266841	Pole	Broadway St. & Fremont St.	Concord
110266839	Pole	2094 Broadway St.	Concord
110266840	Pole	Broadway St. & Market St.	Concord
110266830	Pole	2098 Broadway St.	Concord
110266831	Pole	Across from 2001 Market St.	Concord
110486068	Pole	2110 Market St.	Concord
110196509	Pole	1 Pole N/O 2110 Market St.	Concord
110196620	Pole	2134 Market St.	Concord
110196624	Pole	2170 Market St.	Concord
110196803	Pole	Harrison St. & Broadway St.	Concord
120144259	Pole	1 Pole E/O Harrison St. & Broadway St.	Concord
110391044	Pole	On Oak Grove Rd. 2 Poles N/W Barrymore Dr.	Concord
110452200	Pole	On Oak Grove Rd. 3 Poles N/W Barrymore Dr.	Concord
110191042	Pole	On Oak Grove Rd. 4 Poles N/W Barrymore Dr.	Concord
	Pole	On Oak Grove Rd. 5 Poles N/W Barrymore Dr.	Concord
110191040	Pole	Oak Grove Rd. & Barrymore Dr.	Concord

Structure Number	Structure Type	Address	City
110191039	Pole	1 Pole SE Santa Paula Dr.	Concord
110452191	Pole	2 Poles W/O Graymont Cir. & Oak Grove Rd.	Concord
	Pole	1 Pole W/O Graymont Cir. & Oak Grove Rd.	Concord
110166678	Pole	507 Meadowlark St.	Livermore
110166624	Pole	559 Meadowlark St.	Livermore
804	Pole	Meadowlark St. & Sequoia Dr.	Livermore
110166622	Pole	659 Meadowlark St.	Livermore
110166621	Pole	713 Meadowlark St.	Livermore
110166620	Pole	781 Meadowlark St.	Livermore
110166619	Pole	795 Meadowlark St.	Livermore
110166689	Pole	740 Laurel Dr.	Livermore
110166688	Pole	707 Laurel Dr.	Livermore
110166687	Pole	End of Nightingale St.	Livermore
110166686	Pole	782 Nightingale St.	Livermore
110166685	Pole	766 Nightingale St.	Livermore
110166684	Pole	712 Nightingale St.	Livermore
110166683	Pole	672 Nightingale St.	Livermore
110166694	Pole	661 Nightingale St.	Livermore
110166682	Pole	599 Nightingale St.	Livermore
	Pole	580 Nightingale St.	Livermore
110166680	Pole	526 Nightingale St.	Livermore
110166679	Pole	722 Dogwood Dr.	Livermore

IV. Field Inspection Violations

During the field inspection, my staff observed the following violations:

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.

An abandoned fiber cable was hanging near pole #110191039.

GO 95, Rule 38, Table 2, Row 19, Column C, requires the minimum allowable radial separation between communication conductors and guys supported on the same pole to be 3 inches.

An abandoned fiber cable near pole #110191039 was in contact with the communications level anchor guy at the insulator.

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. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.

The ground wire on the following poles was exposed:

- Pole #110350695 located at the end of Byrd Ln., Pleasanton
- Pole #110452200 located on Oak Grove Rd. 3 poles N/W Barrymore Dr., Concord