

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 13, 2017

CA2017-762

Ross Johnson
Director, Regulatory Affairs
AT&T
430 Bush St, Fifth Floor
San Francisco, CA 94108

SUBJECT: Audit of AT&T's Sonoma Region

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Wilson Tsai of ESRB staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's Sonoma Region from June 26, 2017 to June 29, 2017. During the audit, ESRB staff conducted field inspections of AT&T's facilities and equipment in Sonoma Region and also reviewed pertinent documents and records.

During the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response within 30 days of your receipt of this letter indicating all corrective actions and preventive measures, taken or planned, to address the violations to ensure compliance with GO requirements. The response should indicate the date of each remedial action and preventive measure completed within 30 days. For any outstanding items not addressed within 30 days, please provide the projected completion dates of all actions for all violations outlined in Sections II & IV of the enclosed Audit Findings.

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, appearing to read "Banu Acimis".

Banu Acimis, 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, ESRB, CPUC
Ryan Yamamoto, Senior Utilities Engineer, Supervisor, ESRB, CPUC
Wilson Tsai, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, ESRB staff reviewed the following records from the last five years:

- AT&T's GO 95/128 inspection program
- Sonoma Region Inspection Schedule
- Construction & Engineering work orders
- Technical Field Services (TFS) trouble tickets
- Pole loading calculations

II. Records Violations

ESRB staff observed the following violations during the record review portion of the audit:

1. GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:

“For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.”

AT&T did not complete a total of 135 work orders by their scheduled date of corrective action. Of the 135 work orders, one was a priority level 1, 94 were priority level 2, and 40 were priority level 3.

Per AT&T's procedures, AT&T must complete priority level 1, 2 and 3 work orders within 72 hours, 18 months and 36 months, respectively.

2. 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.”

GO 95, Rule 80.1, A(2), Statewide Inspection Requirements, States:

“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 the following factors:

- *Fire threat*
- *Proximity to overhead power line facilities*
- *Terrain*
- *Accessibility*
- *Location*

Each company that discovers a safety hazard on or near a communications facility or electric facility involving another company while performing inspections of its own facilities pursuant to this rule shall notify the other company and/or facility owner of such safety hazard in accordance with Rule 18(B).

Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections."

AT&T has a procedure in place to ensure that overhead facilities comply with GO 95 requirements; however, ESRB determined that AT&T's procedure is not sufficient since AT&T does not frequently and thoroughly inspect its facilities and address all GO 95 violations and does not perform inspections that encompass all of its overhead facilities. AT&T conducts patrols of non-high fire threat areas every 10 years and does not conduct detailed inspections.

AT&T must review and update its inspection procedure by including inspection requirement and details for overhead facilities in non-high fire threat areas and conduct thorough inspection of its overhead facilities.

3. GO 95, Rule 44.1, Installation and Reconstruction, states in part:

"Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design."

AT&T did not include a CATV box in the pole load calculations for pole #152 located at 21 Bennett Valley Road.

4. 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 has a procedure in place to ensure that underground facilities comply with GO 128 requirements; however, ESRB determined that AT&T's procedure is not sufficient since AT&T does not frequently and thoroughly inspect its facilities and address all GO 128 violations and does not perform inspections that encompass all of its underground facilities. AT&T inspects only nearby underground facilities when reporting to a troubled location.

AT&T must review and update its inspection procedure by including inspection requirement and details for underground facilities and conduct thorough inspection of its underground facilities.

III. Field Inspection

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

Structure Type	Address	City
Pedestal	2131 Campbell Drive	Santa Rosa
Subsurface Enclosure	2201 Quintin Place	Santa Rosa
Pole	1825 Robin Hood Lane	Santa Rosa
Pole	1824 Robin Hood Lane	Santa Rosa
Pole	1910 Robin Hood Lane	Santa Rosa
Pole	1916 Robin Hood Lane	Santa Rosa
Pole	1936 Robin Hood Lane	Santa Rosa
Pole	1818 Robin Hood Lane	Santa Rosa
Pole	2130 E Foothill Drive	Santa Rosa
Pole	2114 E Foothill Drive	Santa Rosa
Pole	2840 Hidden Acres Road	Santa Rosa
Pole	1 Pole S/O 2860 Hidden Acres Road	Santa Rosa
Pole	2 Poles S/O 2860 Hidden Acres Road	Santa Rosa
Pole	4818 Sonoma Mountain Road	Santa Rosa
Pole	1 Pole S/O 4818 Sonoma Mountain Road	Santa Rosa
Pole	2 Poles S/O 4818 Sonoma Mountain Road	Santa Rosa
Pole	3 Poles S/O 4818 Sonoma Mountain Road	Santa Rosa
Pole	4 Poles S/O 4818 Sonoma Mountain Road	Santa Rosa
Pole	5 Poles S/O 4818 Sonoma Mountain Road	Santa Rosa
Span	5041 Sonoma Mountain Road	Santa Rosa
Pole	6 Poles S/O 4818 Sonoma Mountain Road	Santa Rosa
Pole	Pressley Road & Sonoma Mountain Road	Santa Rosa
Pole	37 Bennett Valley Road	Santa Rosa
Pole	36 Bennett Valley Road	Santa Rosa
Pole	35 Bennett Valley Road	Santa Rosa
Pole	34 Bennett Valley Road	Santa Rosa
Pole	33 Bennett Valley Road	Santa Rosa
Pole	32 Bennett Valley Road	Santa Rosa
Pole	31 Bennett Valley Road	Santa Rosa

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. 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.”

AT&T left a disconnected service drop located mid-span in front of 2130 E Foothill Drive, which was abandoned and hanging down.

2. GO 95, Rule 37, Table 1, Case 3, Column B, requires the minimum above ground clearance for communication conductors crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts to be 18 feet.

AT&T had a main communication conductor at 11 feet 10 inches located over the driveway at 5041 Sonoma Mountain Road.