PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

June 9, 2020 CA2020-860

Ross Johnson
Area Manager Regulatory Relations
AT&T North, 430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: CIP Audit of AT&T South Valley – Monterey

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez, Ogeonye Enyinwa, Nathan Sarina, and Charles Mee of ESRB conducted a Communication Infrastructure Provider (CIP) audit of AT&T South Valley – Monterey from March 9-13, 2020. The audit included a review of AT&T's procedures, records, and field inspections of its communication 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 provide a response no later than July 7, 2020, by electronic or hard copy of all corrective actions and preventive measures taken by AT&T to correct the identified violations and prevent the recurrence of such violations.

If you have any questions concerning this audit, please contact Brandon Vazquez at (415) 703-1076 or brandon.vazquez@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
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AT&T SOUTH VALLEY - MONTEREY AUDIT FINDINGS

I. Records Review

During the audit, ESRB staff reviewed the following records:

- AT&T's General Order 95 and General Order 128 inspection program.
- Patrol and detailed-inspection records for the last five years.
- Work order records for overhead and underground AT&T facilities.
- Third Party Safety Hazard notifications for the last five years.
- Pole loading and safety factor calculations completed in the last twelve months.

II. Records Violations

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

1. **GO 95, Rule 80.1-A(1), Inspection Requirements for Joint-Use Poles in High Fire-Threat District** states in part:

   "In Tiers 2 and 3 of the High Fire-Threat District, the inspection intervals for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table."

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

   Commission Decision, D.17-12-024, under Ordering Paragraph #4 states, *"With the exception of implementations instructions set forth in Ordering Paragraphs 2 and 3, the new amended regulations adopted by today's Decision that apply to Zone 1, Tier 2, and/or Tier 3 of the High Fire Threat District shall be:*

   i. Fully implemented in Tier 3 statewide by September 1, 2018, including full requirements pertaining to frequency of inspections …

   ii. Fully implemented in Tier 2 statewide by September 1, 2019, including full requirements pertaining to frequency of inspections …"

   ESRB's review of AT&T's Patrol and Inspection Schedule found that AT&T has not implemented a schedule or started conducting detailed inspections in Tier 2 and 3 High Fire Threat Districts (HFTD) in Monterey County. Per AT&T's response on April 24, 2020, AT&T is expecting to complete all detailed inspections in Tier 3 areas in Monterey County by the end of 2022; however, AT&T did not provide projected completion dates of detailed inspections in Tier 2 areas.

Per D.17-12-024, AT&T should have implemented a schedule and initiated field work for detailed inspections by September 1, 2018 for Tier 3 HFTD and by June 30, 2019 for Tier 2 HFTD.

Please provide us with AT&T's detailed inspection plan and projected completions dates for Tier 2 and 3 areas in Monterey County.

2. **GO 95, Rule 80.1-B, Intrusive Inspections in the High Fire-Threat District** states in part:

> "*Wood poles in Tier 3 of the High Fire-Threat District that support only Communication Lines or equipment shall be intrusively inspected in accordance with the schedule established in General Order 165 if they are:*
>
> - *Interset between joint-use poles supporting supply lines in Southern California.*
> - *Within three spans of a joint-use pole supporting supply lines in Southern California.*
> - *Within one span of a joint-use pole supporting supply lines in Northern California.*

Commission Decision, D.17-12-024, under Ordering Paragraph #4 states, *"With the exception of implementations instructions set forth in Ordering Paragraphs 2 and 3, the new amended regulations adopted by today's Decision that apply to Zone 1, Tier 2, and/or Tier 3 of the High Fire Threat District shall be:*

i. Fully implemented in Tier 3 statewide by September 1, 2018, including full requirements pertaining to frequency of inspections …"

ESRB's review of AT&T's Intrusive Inspection records found that AT&T has not implemented a schedule or started conducting intrusive inspections in Tier 3 HTFD in Monterey County. Per AT&T's response on April 24, 2020, AT&T is currently identifying a sample of poles subject to Rule 80.1-B to be used in a pilot program, with the pilot program expected to be completed in 2020.

Per D.17-12-024, AT&T should have implemented a schedule and initiated field work for intrusive inspections by September 1, 2018 for Tier 3 HFTDs.

Please provide us with AT&T's intrusive inspection plan and projected completions dates for Tier 3 areas in Monterey County.

3. **GO 95, Rule 18-B1(a), Maintenance Programs** states in part:

> *"The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:*
>
> *(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:*
>
> - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*

(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:

- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:

- *Take corrective action within 60 months subject to the exception specified below."*

ESRB's review of AT&T's findings for Monterey County from January 1, 2015 to February 1, 2020 found that AT&T had 29 late-pending work orders and 18 late-complete work orders. Late-pending work orders are work orders that have not been completed by their assigned due date based on their hazard level, and late-complete work orders are work orders that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 47 late work orders by its given hazard level, including the total number of late work orders, as well as late-pending and late-complete work orders, which are included in the total.

Table 1: Late Work Orders

Hazard Levels	Total Late Work Orders	Late-Pending Work Orders	Late-Complete Work Orders
1	36	18	18
2	11	11	0
Total	47	29	18

III. Field Inspection

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

Location	Structure #	Type of Structure	Address/Location	City	Latitude/Longitude
1		Pole	65789 Bradley Rd	Bradley	35.8634866,-120.8028279
2		Pole	One span West of Loc 1	Bradley	35.8634406,-120.8032766
3		Pole	73052 Monterey St	Bradley	35.8629817,-120.8030701
4		Pole	Dixie St X Monterey St	Bradley	35.8626764,-120.8032761
5		Pole	65715 Dixie St	Bradley	35.8627881,-120.8037211
6		Pole	65714 Dixie St	Bradley	35.8629224,-120.8042313
7	Streetlight 709	Pole	Dixie St X Hall St	Bradley	35.862995,-120.8045077
8		Pole	River St X Hall St	Bradley	35.862454,-120.8046164
9		Service Line	72122 River St	Bradley	35.8623572,-120.8048562
10			65486 Bradley Rd	Bradley	35.8642532,-120.8088437
11	Fuse 6719	Pole	65486 Bradley Rd	Bradley	35.8643763,-120.808028
12		Handhole	51201 Pine Canyon Rd, Space 27	King City	36.179546,-121.148081
13	120082255	Pole	201 Broadway St	King City	36.213378,-121.1247829
14		Cable/Splice Box	304 N Russ St	King City	36.2132781,-121.130546
15		Pole	312 N Russ St	King City	36.2136474,-121.1308432
16		Pole	316 N Russ St	King City	36.2136474,-121.1308432
17		Cable	Adjacent to Loc 16	King City	36.2137205,-121.1309016
18		Pole	322 N Russ St	King City	36.2138724,-121.1310234
19		Pole	334 N Russ St	King City	36.2141185,-121.1312223
20		Cable	45382 Spreckles Rd	King City	36.2675107,-121.1467512
21		AT&T Pole	45338 Spreckles Rd	King City	36.2623368,-121.1526468
22		Cable	South of Loc 21	King City	36.2606147,-121.152671
23		Pole	44010 Central Ave	Greenfield	36.2858438,-121.2434208
24		Pole	44515 Central Ave	Greenfield	36.2865052,-121.2469183
25	Fuse 9655	Pole	43850 Central Ave	Greenfield	36.2868642,-121.2476452
26		Pole	3 poles northwest of Loc 25	Greenfield	36.2885244,-121.2498188
27		Pole	37880 Elm Ave	Greenfield	36.2808644,-121.302188
28	87 1/2	AT&T Pole	1 pole north of Loc 27	Greenfield	36.2810891,-121.3018358
29	110463369	Pole	38184 Elm Ave	Greenfield	36.2866666,-121.2968052
30		Pole	1 pole adjacent to Loc 29	Greenfield	36.2866666,-121.2968052
31		AT&T Service Pole	1 pole north of 38405 Elm Ave	Greenfield	36.2897704,-121.2911577
32		Pole	Across road from 38405 Elm Ave	Greenfield	36.2895,-121.2916393
33		Cable	1 span south of Loc 32	Greenfield	36.2892134,-121.2921378
34		Cable	39001 Elm Ave	Greenfield	36.2972597,-121.2777581

35		Pole	711 El Camino Real	Greenfield	36.333469,-121.254359
36		Pole	40571 El Camino Real	Greenfield	36.333072,-121.254003
37	T40593858	Pole	3700 Vida Rd	Soledad	36.3979236,-121.3126791
38		Pole	3 spans south of Loc 37	Soledad	36.3951398,-121.3107103
39		Pole	36200 Arroyo Seco Rd	Soledad	36.4008073,-121.3226617
40		Pole	36308-36080 Arroyo Seco Rd	Soledad	36.400349,-121.3232604
41		Pole	35080 Fort Romie Rd	Soledad	36.402428,-121.3437815
42		AT&T Vault	35080 Fort Romie Rd	Soledad	36.402428,-121.3437815
43			1 span south of Loc 42	Soledad	36.4022442,-121.3440169
44			36595 Colony Rd	Soledad	36.4014221,-121.3450379
45		Pedestal	1623 Vineyard Dr	Soledad	36.425409,-121.3134085
46		Handhole	661 Asilomar Ave	Soledad	36.4342022,-121.3127886
47		AT&T Pole	Rocky Creek Bridge	Carmel by the Sea	36.3799035,-121.9019093
48		AT&T Pole	38525 Cabrillo Hwy	Carmel by the Sea	36.3802327,-121.9015366
49		AT&T Pole	1 pole north of Loc 48	Carmel by the Sea	36.3807173,-121.9011418
50		AT&T Pole	4 poles north of Loc 49	Carmel by the Sea	36.3824188,-121.9003128
51			Rocky Creek Bridge	Carmel by the Sea	36.3799035,-121.9019093
52			37921 Palo Colorado Rd	Carmel by the Sea	36.387302,-121.872002
53		AT&T Pole	31599 Cabrillo Hwy	Carmel by the Sea	36.467941, -121.929924
54	380	AT&T Pole	South of Loc 53	Carmel by the Sea	36.4506961,-121.9264304
55		AT&T Pole	30500 Aurora Del Mar	Carmel by the Sea	36.4805637,-121.9371409
56		Pole	Oliver Rd X Fisher Pl	Carmel by the Sea	36.539766,-121.912982
57		Pole	26399 Mission Fields Rd	Carmel by the Sea	36.540481,-121.916032
58		Pole	25250 Randall Way	Carmel by the Sea	36.5565166,-121.9133938
59		Pole	Randall Way X Allen Pl	Carmel by the Sea	36.556369,-121.913418
60		Pole	25290 Randall Way	Carmel by the Sea	36.5560712,-121.9133401
61		Secondary Pole	25280 Allen Pl	Carmel by the Sea	36.5562837,-121.9138644
62		Secondary Pole	25260 Allen Pl	Carmel by the Sea	36.5561495,-121.9142474
63		Pole	1141 Fremont Blvd	Seaside	36.6015062,-121.8497482
64		Pole	630 Francis Ave	Seaside	36.6015163,-121.8503089
65		Pole	600 Francis Ave	Seaside	36.6015299,-121.8507511
66	Fuse 1422	Pole	1422 Del Monte Ave	Salinas	36.682472,-121.6053836

67		Joint Service Pole	1437 Del Monte Ave	Salinas	36.6825461,-121.605449
68	11033001	Pole	1441 Del Monte Ave	Salinas	36.6819002,-121.6032034
69		Pole	1 pole northeast of Loc 68	Salinas	36.6823353,-121.6024469
70		Pole	2 poles northeast of Del Monte Ave X Williams Rd	Salinas	36.6815953,-121.6037261
71	120093002	Pole	1 pole northeast of Del Monte Ave X Williams Rd	Salinas	36.6814197,-121.6040283
72	Switch 20453	Pole	Del Monte Ave X Williams Rd	Salinas	36.6814073,-121.6044479
73		Pole	1432 Del Monte Ave	Salinas	36.681712,-121.6047275
74		Pole	1430 Del Monte Ave	Salinas	36.6819428,-121.6049246
75		Pole	1260 Del Monte Ave	Salinas	36.684013,-121.606858
76		Pole	1250 Del Monte Ave	Salinas	36.684333,-121.607139
77		Pole	1242 Del Monte Ave	Salinas	36.684615,-121.607383
78		Tap Service Lines	1232 Del Monte Ave	Salinas	36.6846485,-121.6072833
79		Pole	657 Dallas Ave	Salinas	36.6843093,-121.6073914

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. **GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, Use** states in part:

> *"Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."*

1.1) The anchor guy on the pole at 65789 Bradley Rd in Bradley (Location 1) is slacked.

1.2) The anchor guy on the pole at 201 Broadway St in King City (Location 13) is slacked.

1.3) The anchor guy on the pole at 44515 Central Ave in Greenfield (Location 24) is slacked.

1.4) The anchor guy on the pole at 38184 Elm Ave in Greenfield (Location 29) is slacked.

1.5) The anchor guy on the pole at 3700 Vida Rd in Soledad (Location 37) is slacked.

1.6) Two anchor guys on the pole at 36200 Arroyo Seco Rd in Soledad (Location 38) are slacked.

1.7) The anchor guy on the pole near the Rocky Creek Bridge in Carmel by the Sea (Location 47) is slacked.

1.8) The anchor guy on the pole at 31599 Cabrillo Hwy in Carmel by the Sea (Location 53) is slacked.

2. **GO 95, Rule 86.9, Guy Marker (Guy Guard)** states:

> *"A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."*

2.1) The anchor guy on the pole at 65789 Bradley Rd in Bradley (Location 1) is missing a guy marker.

2.2) The anchor guy on the pole one span west of Loc 1 in Bradley (Location 2) is missing a guy marker.

2.3) The anchor guy on the pole at 35080 Fort Romie Rd in Soledad (Location 41) is missing a guy marker.

3. **GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2 Case 17C** states in part:

   "Minimum allowable radial separation between communication conductors on the same crossarm, pole or structure/incidental pole wiring is 3 inches."

   3.1) Two AT&T service lines are in contact at the intersection of Dixie St and Hall St in Bradley (Location 7).

   3.2) An AT&T service line and Comcast line are in contact at 1430 Del Monte Ave in Salinas (Location 74).

   3.3) AT&T service lines coming off secondary crossarm are in contact with Comcast service lines midspan at 1232 Del Monte Ave in Salinas (Location 78).

4. **GO 95, Rule 31.6, Abandoned Lines** states:

   "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."

   4.1) There were abandoned AT&T facilities near the pole at the intersection of River St and Hall St in Bradley (Location 8). AT&T removed the idle facilities during the audit.

   4.2) There is an abandoned AT&T line on the ground at 44010 Central Ave in Greenfield (Location 23).

   4.3) There are abandoned AT&T facilities on the AT&T pole located 1 pole north of 38405 Elm Ave in Greenfield (Location 31).

   4.4) There are abandoned AT&T facilities on the pole near the Rocky Creek Bridge in Carmel by the Sea (Location 47).

   4.5) There is an abandoned AT&T line on the ground near the pole located 1 pole north of Location 48 in Carmel by the Sea (Location 49).

   4.6) There are abandoned AT&T lines on the ground going to an AT&T Network Interface located near the Rocky Creek Bridge in Carmel by the Sea (Location 51).

5. **GO 95, Rule 84.8-C1, Service Drops, Clearances Above Public Thoroughfares** states:

   "*Vertical clearance shall not be less than 18 feet.*

   EXCEPTION: *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. In no case shall the clearance at the center line be less than 18 feet. Where there are no*

curbs, the foregoing provisions shall apply using the outer limits of normal longitudinal vehicular movement in lieu of a curb line."

5.1) The groundline clearance of the AT&T service line at 72122 River St in Bradley (Location 9) was measured to be 13 feet 9.5 inches at the curb. A higher suitable point of attachment needs to be installed on the customer-owned service pole.

6. **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."

6.1) The lashing wire near the bridge at 65486 Bradley Rd in Bradley (Location 10) is broken.

6.2) AT&T's facilities need to be transferred to the new pole at 312 N Russ St in King City (Location 15).

6.3) The terminal box at 334 N Russ St in King City (Location 19) is open.

6.4) The AT&T pole at 45338 Spreckles Rd in King City (Location 21) is leaning more than 10%.

6.5) There is broken lashing wire along the conductor spans south of Location 21 in King City (Location 22).

6.6) The lashing wire north of 38405 Elm Ave in Greenfield (Location 31) is broken.

6.7) The wind/vibration damper at 39001 Elm Ave in Greenfield (Location 34) is loose.

6.8) The lashing wire at 39001 Elm Ave in Greenfield (Location 34) is broken.

6.9) The load terminal at 711 El Camino Real in Greenfield (Location 35) is open.

6.10) The load terminal at 40571 El Camino Real in Greenfield (Location 36) is open.

6.11) The lashing wire at 36200 Arroyo Seco Rd in Soledad (Location 39) is broken causing two AT&T lines to be in contact.

6.12) The lashing wire south of Location 42 in Soledad (Location 43) is broken.

6.13) There are multiple broken lashing wire issues along the conductor spans near 36595 Colony Rd in Soledad (Location 44).

6.14) The pole located 4 poles north of Location 49 in Carmel by the Sea (Location 50) is leaning more than 10%.

6.15) The lashing wire at 37921 Palo Colorado Rd in Carmel by the Sea (Location 52) is broken.

6.16) The AT&T pole located south of Location 53 in Carmel by the Sea (Location 54) is leaning more than 10%.

6.17) The AT&T pole at 30500 Aurora Del Mar in Carmel by the Sea (Location 55) is leaning approximately 70-80 degrees.

6.18) The load terminal at 1422 Del Monte Ave in Salinas (Location 66) is broken and tied with zip ties.

7. **GO 128, Rule 42.7, Manholes and Handholes, Covers** states:

   "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)."

   7.1) The handhole cover at 51201 Pine Canyon Rd, Space 27 in King City (Location 12) is broken and cannot be properly closed.

   7.2) The handhole cover at 35080 Fort Romie Rd in Soledad (Location 42) is damaged and not properly secured.

8. **GO 128, Rule 43.3-C1, Buried Cables and Conductors, Depths** states in part:

   "Communication cables shall be installed at a minimum depth below the surface under which they are located as follows except as provided in Rule 43.3-D:

   ***(1) Sidewalks, Parkways and Private Property:** 12 inches"*

   There is a temporary service cable (string-by) at 51201 Pine Canyon Rd, Space 27 in King City (Location 12) laying on the ground.

9. **GO 95, Rule 44.2, Additional Construction** states in part:

   "Any entity planning the addition of facilities that materially increases loads on a structure shall perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors below the values specified by Rule 44.3. Such loading calculations shall be based on existing condition and proposed configuration, information provided under Rule 44.4, conservative values of relevant parameters, industry recognized values of relevant parameters, or any combination thereof…"

   The pole loading calculation from AT&T Project # A01HMT2 for the pole at 40572 El Camino Real in Greenfield (Location 36) is inaccurate. The fiber height used in the load

calculation is 17.8 feet; however, the height measured during the audit was 20 feet 4 inches. In addition, the telco height used in the load calculation is 17 feet; however, the height measured during the audit was 21 feet 4 inches.

10. **GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2 Case 8C** states in part:

    "Minimum allowable vertical separation between conductors and/or cables, on supports at different levels on the same pole and in adjoining midspans for communication conductors is 12 inches.

    ***Exception:** Can be less than 12" for strand mounted terminals, splice cases and other equipment located 8" or more from the centerline of the pole, but not less than 1" with mutual agreement between affected owners."*

    10.1) Two AT&T lines at 36200 Arroyo Seco Rd in Soledad (Location 39) are in contact due to broken lashing wire.

    10.2) An AT&T splice box is in contact with an AT&T line at 1432 Del Monte Ave in Salinas (Location 73).

11. **GO 95, Rule 84.6-B, Vertical and Lateral Conductors, Ground Wires** states:

    "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.

    Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8)."

    The ground wire on the pole at 36308 Arroyo Seco Rd in Soledad (Location 40) is exposed.

12. **GO 95, 87.7-D1, Risers, Covered from Ground Level to 8 Feet above the Ground** states:

    "Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8"

12.1) The riser cover on the pole at 36308 Arroyo Seco Rd in Soledad (Location 40) is not properly secured.

12.2) The riser cover on the pole located 1 pole north of Location 48 in Carmel by the Sea (Location 49) is not properly secured.

12.3) The riser cover on the pole at the intersection of Del Monte Ave and Williams Rd in Salinas (Location 72) is not properly secured.

12.4) The riser cover on the pole at 657 Dallas Ave in Salinas (Location 79) is not properly secured.

13. GO 95, Rule 84.4-A2, Clearances, Above Ground in Rural Districts states:

"The clearance of Table 1, Case 4, Column B may be reduced to not less than 13 feet above ground along thoroughfares in rural districts where no part of the line overhangs any part of the thoroughfare which is ordinarily traveled and where it is unlikely that vehicles will be required to cross under the communication conductors."

13.1) The groundline clearance of the AT&T line at 38525 Cabrillo Hwy in Carmel by the Sea (Location 48) is low.

13.2) The groundline clearance of the AT&T line at 37921 Palo Colorado Rd in Carmel by the Sea (Location 52) is low.

14. GO 95, Rule 35, Vegetation Management states in part:

"Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain

on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule."

14.1) There is vegetation strain on AT&T's line at 37921 Palo Colorado Rd in Carmel by the Sea (Location 52).

14.2) There is vegetation strain/abrasion on AT&T's line at 25250 Randall Way in Carmel by the Sea (Location 58).

15. **GO 95, Rule 49.1-C, Setting of Poles, Table 6** states in part:

"The minimum depth in soil for a 20 foot pole is 4 feet."

The AT&T pole at 31599 Cabrillo Hwy in Carmel by the Sea (Location 53) is not set in the ground and held in place by line tension.

16. **GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2 Case 19C** states in part:

"Minimum allowable radial separation between guys and span wires passing on conductors on the same pole is 3 inches."

16.1) AT&T's line is in contact with a PG&E anchor guy at 26399 Mission Fields Rd in Carmel by the Sea (Location 57).

16.2) AT&T's line is in contact with a PG&E anchor guy at the intersection of Randall Way and Allen Pl in Carmel by the Sea (Location 59).

16.3) AT&T's line is in contact with a PG&E primary and secondary anchor guy at 657 Dallas Ave in Salinas (Location 79).

16.4) AT&T's line is in contact with a Comcast anchor guy at 657 Dallas Ave in Salinas (Location 79).

17. **GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities** states in part:

"For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property…"

GO 95, Rule 18A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

"(3) If a company, while performing inspections of its facilities, discovers a Safety

Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO95.

Note: Each pole owner must be able to determine all other pole owners on poles it owns. Each pole owner must be able to determine all authorized entities that attach equipment on its portion of a pole."

17.1) The PG&E pole at 65486 Bradley Rd in Bradley (Location 11) has: exposed ground wire and abandoned idle fuses attached to the pole.

17.2) Comcast's facilities need to be transferred to the new pole at 312 N Russ St in King City (Location 15).

17.3) There is a low idle Comcast service line at 316 N Russ St in King City (Location 16).

17.4) There is an idle Comcast service line hanging on a tree adjacent to Location 16 in King City (Location 17).

17.5) The Comcast riser cable on the pole at 322 N Russ St in King City (Location 18) is not covered.

17.6) The PG&E anchor guy on the pole at 43850 Central Ave in Greenfield (Location 25) is slacked.

17.7) The PG&E pole located 3 poles northwest of Location 25 in Greenfield (Location 26) is leaning more than 10%.

17.8) There is vegetation contact above the PG&E anchor guy insulator at 37880 Elm Ave in Greenfield (Location 27).

17.9) The PG&E pole at 38184 Elm Ave in Greenfield (Location 29) has a slacked anchor guy and damaged guy marker.

17.10) The PG&E pole located adjacent to Location 29 in Greenfield (Location 30) has a split pole top and broken anchor guy.

17.11) The soil around the PG&E pole at 3700 Vida Rd in Soledad (Location 37) is cracking and separating from the base of the pole.

17.12) The PG&E pole located 3 poles south of Location 37 in Soledad (Location 38) is leaning approximately 10% and has soil erosion.

17.13) The PG&E pole at 36200 Arroyo Seco Rd in Soledad (Location 39) is leaning due to improper tensioning of primary lines.

17.14) The PG&E pole at 36308 Arroyo Seco Rd in Soledad (Location 40) is leaning more than 10%.

17.15) The Comcast ground wire on the pole at 26399 Mission Fields Rd in Carmel by the Sea (Location 57) is exposed.

17.16) A tree trunk is causing abrasion on PG&E's secondary line at 25250 Randall Way in Carmel by the Sea (Location 58).

17.17) The lashing wire on a PG&E secondary line at the intersection of Randall Way and Allen Pl in Carmel by the Sea (Location 59) is broken due to vegetation abrasion.

17.18) There is vegetation contacting the PG&E anchor guy insulator at 25290 Randall Way in Carmel by the Sea (Location 60).

17.19) There is vegetation contact at/above the PG&E anchor guy insulator at 25280 Allen Pl in Carmel by the Sea (Location 61).

17.20) There is a low idle Comcast line on the pole at 25260 Allen Pl in Carmel by the Sea (Location 62).

17.21) There is vegetation contact at/above the PG&E anchor guy insulator at 25260 Allen Pl in Carmel by the Sea (Location 62).

17.22) The Comcast riser cover on the pole at 1441 Del Monte Ave in Salinas (Location 68) is missing.

17.23) Extanet's splice box is in contact with a Comcast line located 1 pole northeast of Location 68 in Salinas (Location 69).

17.24) The PG&E span guy located 2 poles northeast of the intersection of Del Monte Ave and Williams Rd in Salinas (Location 70) is slacked.

17.25) The Comcast anchor guy located 1 pole northeast of the intersection of Del Monte Ave and Williams Rd in Salinas (Location 71) is missing a guy marker.

17.26) The Comcast riser cover on the pole at the intersection of Del Monte Ave and Williams Rd in Salinas (Location 72) is loose.

17.27) The Comcast ground wire on the pole at the intersection of Del Monte Ave and Williams Rd in Salinas (Location 72) is exposed.

17.28) A Comcast service line is tapped off of an AT&T line at 1232 Del Monte Ave in Salinas (Location 78).

17.28) The Comcast service line tapped off of an AT&T line is in contact with AT&T service lines midspan at 1232 Del Monte Ave in Salinas (Location 78).

17.29) The Comcast service line tapped off of an AT&T line is low at 1232 Del Monte Ave in Salinas (Location 78).