

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 16, 2020

CA2020-886

Ross Johnson  
AT&T Director of Regulatory Relations  
430 Bush Street, 5th Floor  
San Francisco, CA 94108

**SUBJECT:** Audit of AT&T Ventura County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Calvin Choi of my staff conducted the records review part of AT&T Ventura County District's audit in June 2020. The field inspections part of the audit will be rescheduled to a future date.

The review of the AT&T Ventura County District records identified multiple violations of one or more General Orders (GOs). An itemized copy of the audit findings violations identified by staff is enclosed along with this letter. Please provide an electronic or hard copy of all corrective measures performed by AT&T to remediate and prevent such violations by the close of business day of August 17, 2020.

If you have any questions concerning this audit, please contact Calvin Choi at (213) 266-4730 or [Calvin.Choi@cpuc.ca.gov](mailto:Calvin.Choi@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

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC  
Calvin Choi, Utilities Engineer, CPUC

**AUDIT FINDINGS**

## I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- AT&T's Intrusive Inspection of Wood Poles
- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines

## 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. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

**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. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following factors...*

AT&T divides and identifies its inspection area by routes rather than poles. Inspections for the following routes were not completed by the due date as required by AT&T procedures:

- Detailed inspections in 14 routes in a Tier 2 High Fire Threat Area.
- Detailed inspections in 310 routes in a Tier 3 High Fire Threat Area.
- Patrol inspections in 37 routes in a Tier 3 High Fire Threat Area.

**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 failed to provide us with any records indicating that AT&T inspects its underground facilities frequently and thoroughly to ensure that they are in compliance with GO 128.

**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 18,** requires communications companies to document hazardous conditions and schedule corrective action date for each condition.

AT&T failed to complete 113 work orders by AT&T's own scheduled due date for corrective action (based on AT&T's "Overhead Lines Maintenance Plan"):

- Level 1 (required 72 hours) – seven work orders completed late
- Level 2a (required 12 months) – 12 work orders completed late
- Level 2b (High Fire Tier 3 requiring 6 months completion) – two work orders completed late
- Level 3 (required 60 months) – 92 work orders completed late