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

October 13, 2022 CA2022-1011

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

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Contra Costa

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Nathan Sarina of ESRB conducted a CIP audit of AT&T Contra Costa from August 1-5, 2022. During the audit, ESRB staff conducted field inspections of AT&T's communications facilities and reviewed pertinent documents and records.

As a result of the audit, ESRB identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than November 10, 2022, by electronic copy of all corrective actions and preventive measures taken by AT&T to correct the identified violations and prevent the recurrence of such violations. The response should indicate the date each remedial action and preventive measure was completed. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Sections II & IV, and field observations listed in Section V of the enclosed Audit Report.

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 CIP Audit Report for AT&T Contra Costa and Excel File for Late Work Orders

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC

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CPUC AUDIT FINDINGS
AT&T CONTRA COSTA AUDIT
August 1-5, 2022

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) reviewed the following records:

- AT&T Contra Costa service territory map.
- AT&T's General Order (GO) 95 and 128 maintenance and inspection procedures and programs.
- AT&T's inspector training program.
- Patrol and detailed-inspection records and findings for the last five years.
- Records for intrusive pole inspections conducted in the last five years.
- Work order records and completed and pending corrective actions for overhead and underground AT&T facilities for the last five years.
- Incoming/Outgoing Third-Party Safety Hazard notifications for the last five years.
- Pole loading and safety factor calculations completed in the last twelve months.
- New construction projects completed in the last twelve months.

II. Records Violations

ESRB identified the following violations during the record review portion of the audit:

1. 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 work orders from May 1, 2017 to May 31, 2022 found that AT&T had a total of 38 late-pending work orders and 79 late-closed work orders.[1] Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 117 late work orders by hazard level, including the total number of late work orders, as well as late-pending and late-closed work orders, which are included in the total.

Table 1: Late Work Orders

Hazard Levels	Total Late Work Orders	Late-Pending Work Orders	Late-Closed Work Orders
1	2	1	1
2	115	37	78
3	-	-	-
Total	117	38	79

2. **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-A(2), 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."

AT&T only conducts inspections outside of the High Fire-Threat District (HFTD) when safety hazards or nonconformances are identified by AT&T during routine non-inspection work or by a third-party. However, the facilities inspected by AT&T are limited to facilities one span in each direction from the location of the safety hazard/nonconformance. Therefore, ESRB determined that AT&T's inspection procedure[2] does not ensure that its overhead communication facilities located outside of the HFTD are inspected frequently and thoroughly per GO 95, Rules 31.2 and 80.1-A(2).

[1] Refer to attached excel file "CA2022-1011_ATT_ContraCosta_LateWorkOrders" for the late work orders. In the excel file Column D is the date the work order was created, Column E is the date the work order was due, Column F is the date the work order was completed (if closed), and Column G is how many days the work order was late. DAYS LATE (Column G) for the late-pending work orders are calculated as of May 31, 2022.

[2] AT&T document: G.O. 95 Visual Inspections of Overhead Lines. Date issued: 1/30/2013.

3. **GO 128, Rule 17.2, Inspection** states in part:

> *"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 of these rules."*

ESRB found that AT&T does not have procedures to ensure that all its underground communication facilities are inspected frequently and thoroughly per GO 128, Rule 17.2. AT&T only conducts underground inspections when safety hazards or nonconformances are identified by AT&T during unrelated routine work or by a third-party. However, the underground facilities inspected by AT&T are limited to facilities one span in each direction from the location of the safety hazard/nonconformance.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure #	Structure Type	Structure Location/Address	City
1		Pole	7210 Tamarack Dr	Dublin
2		Pole	7168 Tamarack Dr	Dublin
3		Handhole	51 Hazelnut Ct	San Ramon
4		Line	3705 Norris Canyon Rd	San Ramon
5	110353346	Pole	3705 Norris Canyon Rd	San Ramon
6		Secondary Pole	3686 Norris Canyon Rd	San Ramon
7	110221464	Pole	37.7634, -121.983	San Ramon
8		Manhole	370 Diablo Rd	Danville
9	110381771	Pole	37.8223, -122.004	Danville
10	110381767	Pole	102 Alice Ct	Danville
11	110447019	Pole	176 La Sonoma Way	Alamo
12		Pole	181 La Sonoma Way	Alamo
13		Line	173 La Sonoma Way	Alamo
14	110453880	Pole	168 La Sonoma Way	Alamo
15	110257262	Pole	37.8443, -122.028	Alamo
16	120809818	Pole	110 El Toyonal	Orinda
17		Service Line	106 El Toyonal	Orinda
18		Pole	28 Vallecito Ln	Orinda
19		Secondary Pole	24 Vallecito Ln	Orinda
20		Service Line	8 Vallecito Ln	Orinda
21	120821845	Pole	2 Vallecito Ln	Orinda
22	110329832	Pole	Rear off 1 El Dorado Ln	Orinda
23	120125798	Pole	44 Loma Vista Dr	Orinda
24		Pole	104 Silverwood Dr	Lafayette
25		Line	Across from 103 Silverwood Dr	Lafayette
26		Line	Oak Knoll Rd & El Nido Ranch Rd	Lafayette
27	110163405	Pole	Across from 1036 Oak Knoll Rd	Lafayette
28	110163409	Pole	Oak Knoll Rd & El Nido Ranch Rd	Lafayette
29	100489429	Pole	3616 Walnut St	Lafayette
30		Pole	Herman Dr and Moraga Rd	Lafayette
31	110159196	Pole	2 Moss Ln	Lafayette
32	110159192	Pole	37.8966, -122.112	Lafayette
33	110159194	Pole	Rear off 1077 Miller Dr	Lafayette
34	110196319	Pole	1143 Perales St	Lafayette
35	110196320	Pole	Perales St and Acalanes Ave	Lafayette
36	110261169	Pole	1569 Rancho View Dr	Lafayette

37	120114870	Pole	1565 Rancho View Dr	Lafayette
38	120173324	Pole	1855 Reliez Valley Rd	Lafayette
39		Pole	1 Pole south of Alhambra Valley Rd and Pyrmont Ct	Martinez
40	110246080	Pole	5415 Alhambra Valley Rd	Martinez
41		Pole	5346 Alhambra Valley Rd	Martinez
42	110246063	Pole	Alhambra Valley Rd and Pine Tree Trail	Martinez
43		MPO	1817 Enclave Pl	Concord
44	120179018	Pole	1894 Enclave Pl	Concord
45	120815697	Pole	Willow Terrace Townhomes	Concord
46		Handhole	37.9763, -122.072	Pleasant Hill
47		Handhole	1261 St Moritz Ave	Martinez
48		Fiber Flexibility Plant	Laurel Knoll Dr and Muir Station Rd	Martinez
49		Handhole	3710 Alhambra Way	Martinez
50	120115485	Pole	37.9953, -122.148	Martinez
51	110246143	Pole	2290 Franklin Canyon Rd	Martinez
52	110246145	Pole	2300 Franklin Canyon Rd	Martinez
53	110516474	Pole	37.9979, -122.159	Martinez
54		Handhole	2731 Doidge Ave	Pinole
55	110441780	Pole	2410 Colina Ct	Pinole
56	110441781	Pole	Pinole Valley Rd and Savage Ave	Pinole
57	110441783	Pole	Pinole Valley Rd	Pinole
58	121253721	Pole	5580 Sobrante Ave	El Sobrante
59	110409367	Pole	5590 Sobrante Ave	El Sobrante
60	110421851	Pole	5451 Sobrante Ave	El Sobrante
61	110409781	Pole	3150 11th St	San Pablo
62	101429764	Pole	1111 Stonington Ave	San Pablo
63	120248292	Secondary Pole	294 Curry St	Richmond
64	110233631	Pole	912 Harbour Way S	Richmond
65	110238980	Pole	1 Pole south of Location 64	Richmond
66	110513396	Pole	38.0113, -121.997	Concord
67	110332531	Pole	38.0167, -121.987	Concord
68	120871417	Pole	Avila Rd	Concord
69		Handhole	98 Pacifica Ave	Bay Point
70	110214419	Pole	99 Anchor Dr	Bay Point
71	110175290	Pole	72 Pacifica Ave	Bay Point
72	110459826	Pole	38.0017, -121.947	Pittsburg
73	110213732	Pole	38.00319, -121.9461	Pittsburg
74		Handhole	71 Leeward Way	Pittsburg
75	110131360	Pole	Nortonville Rd	Pittsburg
76	110131352	Pole	Nortonville Rd	Pittsburg

77	120054114	Pole	Nortonville Rd and Kirker Pass Rd	Pittsburg
78		Handhole	3701 Pintail Dr	Antioch
79		Pole	37.998016, -121.85969	Pittsburg
80		Manhole	2217 Manzanita Way	Antioch
81	110170093	Secondary Pole	623 3rd St	Brentwood
82		Secondary Pole	605 3rd St	Brentwood
83	110170096	Secondary Pole	553 3rd St	Brentwood
84	121322227	Pole	Chesnut St and Third St	Brentwood
85	51	AT&T Pole	37.8794, -121.724	Brentwood
86	52	AT&T Pole	1 Pole south of Location 85	Brentwood
87	110116424	Pole	37.8732, -121.699	Brentwood
88	110116423	Pole	1 Pole south of Location 87	Brentwood
89	110116421	Secondary Pole	130 Walnut Blvd	Brentwood
90	110116422	Pole	Across from 130 Walnut Blvd	Brentwood
91	120117871	Pole	1 Pole south of Location 92	Byron
92	120117859	Pole	37.8638, -121.671	Byron
93	120117872	Pole	1 Pole northeast of Location 92	Byron
94	120939214	Secondary Pole	15189 Byron Hwy	Byron
95		Secondary Pole	1 Pole south of Location 94	Byron
96	110116173	Pole	3845 Camino Diablo	Byron
97	121031656	Pole	3745 Camino Diablo	Byron
98	110178416	Pole	1 Pole north of Location 97	Byron
99	110178418	Pole	2 Poles north of Location 97	Byron
100	110178417	Pole	3 Poles north of Location 97	Byron

IV. Field Inspection Violations

ESRB observed the following violations during the field inspection:

1. 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."*

1.1. Vegetation is causing strain/abrasion on AT&T's line at 3705 Norris Canyon Rd in San Ramon (Location 4).
1.2. Vegetation is causing strain/abrasion on AT&T's line at 173 La Sonoma Way in Alamo (Location 13).
1.3. Vegetation is causing strain/abrasion on AT&T's line at 168 La Sonoma Way in Alamo (Location 14).
1.4. Vegetation is causing strain/abrasion on AT&T's line at the rear off 1 El Dorado Ln in Orinda (Location 22).
1.5. Vegetation is causing strain/abrasion on AT&T's line across from 103 Silverwood Dr in Lafayette (Location 25).
1.6. Vegetation is causing strain/abrasion on AT&T's line across from 1036 Oak Knoll Rd in Lafayette (Location 27).
1.7. Vegetation is causing strain/abrasion on AT&T's line at Oak Knoll Rd & El Nido Ranch Rd in Lafayette (Location 28).
1.8. Vegetation is causing strain/abrasion on AT&T's line at 2 Moss Ln in Lafayette (Location 31).
1.9. Vegetation is causing strain/abrasion on AT&T's line at 1143 Perales St in Lafayette (Location 34).
1.10. Vegetation is causing strain/abrasion on AT&T's line at Alhambra Valley Rd and Pine Tree Trail in Martinez (Location 42).
1.11. Vegetation is causing strain/abrasion on AT&T's line at GPS coordinates 37.9953, -122.148 in Martinez (Location 50).
1.12. Vegetation is causing strain/abrasion on AT&T's line at 5590 Sobrante Ave in El Sobrante (Location 59).

1.13. Vegetation is causing strain/abrasion on AT&T's line at 5451 Sobrante Ave in El Sobrante (Location 60).
1.14. Vegetation is causing strain/abrasion on AT&T's line at 130 Walnut Blvd in Brentwood (Location 89).
1.15. Vegetation is causing strain/abrasion on AT&T's line at 15189 Byron Hwy in Byron (Location 94).

2. GO 95, Rule 87.7-D(1), 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"

2.1. The riser cover on the pole at 3705 Norris Canyon Rd in San Ramon (Location 5) is loose leaving the riser exposed.
2.2. The riser at 110 El Toyonal in Orinda (Location 16) is not attached to the pole.
2.3. The riser on the pole at 1143 Perales St in Lafayette (Location 34) is missing a riser cover and is not properly secured.
2.4. Two risers on the pole at GPS coordinates 37.9979, -122.159 in Martinez (Location 53) are exposed and not properly secured at the bottom of the pole.
2.5. The riser on the pole at Pinole Valley Rd in Pinole (Location 57) is missing a riser cover and vegetation is obstructing it.
2.6. The riser on the pole at 912 Harbour Way S in Richmond (Location 64) is missing a riser cover.
2.7. The riser on the pole at GPS coordinates 38.0113, -121.997 in Concord (Location 66) is exposed and not properly secured at the bottom of the pole.
2.8. The riser cover on the pole at GPS coordinates 38.0017, -121.947 in Pittsburg (Location 72) is loose leaving the riser exposed.

3. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2 Case 8 Column C 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."*

3.1. An AT&T service line is contacting PG&E and cable tv service lines at 3686 Norris Canyon Rd in San Ramon (Location 6).
3.2. An AT&T service line is less than 12 inches from a PG&E service line at 110 El Toyonal in Orinda (Location 16).
3.3. An AT&T line is contacting a cable tv line at 2 Vallecito Ln in Orinda (Location 21).
3.4. An AT&T line is contacting a cable tv line at Herman Dr and Moraga Rd in Lafayette (Location 30).

4. 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."

4.1. The lashing wire at GPS coordinates 37.8223, -122.004 in Danville (Location 9) is broken causing the line to sag.
4.2. A small section of tree branch on an AT&T line at 181 La Sonoma Way in Alamo (Location 12) could fall and hit pedestrians.
4.3. AT&T's facilities need to be transferred to the new pole at 28 Vallecito Ln in Orinda (Location 18).
4.4. The lashing wire at Herman Dr and Moraga Rd in Lafayette (Location 30) is broken.
4.5. An AT&T splice box at 1569 Rancho View Dr in Lafayette (Location 36) is open.
4.6. AT&T's facilities need to be transferred to the new pole located 1 pole south of Alhambra Valley Rd and Pyrmont Ct in Martinez (Location 39).
4.7. AT&T's facilities need to be transferred to the new pole at 1894 Enclave Pl in Concord (Location 44).
4.8. AT&T's facilities need to be transferred to the new pole at Willow Terrace Townhomes in Concord (Location 45).
4.9. AT&T's facilities need to be transferred to the new pole at GPS coordinates 37.9953, -122.148 in Martinez (Location 50).
4.10. An AT&T splice box at GPS coordinates 37.9979, -122.159 in Martinez (Location 53) is covered with a bag.
4.11. An AT&T splice box at 5451 Sobrante Ave in El Sobrante (Location 60) is covered with a bag.
4.12. AT&T's facilities need to be transferred to the new pole at 294 Curry St in Richmond (Location 63).
4.13. AT&T's facilities need to be transferred to the new pole at Avila Rd in Concord (Location 68).
4.14. AT&T's facilities need to be transferred to the new pole at 72 Pacifica Ave in Bay Point (Location 71).

4.15. The lashing wire at GPS coordinates 38.0017, -121.947 in Pittsburg (Location 72) is broken.
4.16. The lashing wire at GPS coordinates 38.00319, -121.9461 in Pittsburg (Location 73) is broken.
4.17. AT&T's facilities need to be transferred to the new pole at Chesnut St and Third St in Brentwood (Location 84).
4.18. The lashing wire at GPS coordinates 37.8794, -121.724 in Brentwood (Location 85) is broken.
4.19. The lashing wire located 1 pole south of Location 85 in Brentwood (Location 86) is broken.
4.20. The anchor guy on the pole at GPS coordinates 37.8732, -121.699 in Brentwood (Location 87) has an exposed anchor.
4.21. The anchor guy on the pole located 1 pole south of Location 87 in Brentwood (Location 88) has an exposed anchor.
4.22. AT&T's facilities need to be transferred to the new pole located 1 pole south of Location 92 in Byron (Location 91).
4.23. AT&T's facilities need to be transferred to the new pole at GPS coordinates 37.8638, -121.671 in Byron (Location 92).
4.24. The lashing wire at GPS coordinates 37.8638, -121.671 in Byron (Location 92) is broken.
4.25. AT&T's facilities need to be transferred to the new pole located 1 pole northeast of Location 92 in Byron (Location 93).
4.26. The lashing wire at 15189 Byron Hwy in Byron (Location 94) is broken.
4.27. The lashing wire located 1 pole south of Location 94 in Byron (Location 95) is broken.
4.28. AT&T's facilities need to be transferred to the new pole at 3745 Camino Diablo in Byron (Location 97).

5. 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)."

5.1. The ground wire on the pole at 176 La Sonoma Way in Alamo (Location 11) is exposed.
5.2. The ground wire on the pole located 1 pole north of Location 97 in Byron (Location 98) is exposed.

5.3. The ground wire on the pole located 2 poles north of Location 97 in Byron (Location 99) is exposed.

6. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1 Case 5 Column B states in part:

"The basic minimum allowable vertical clearance of a communication conductor and supply service drop in an above ground area accessible to pedestrians only is 10 feet."

Exception (Rule 84.4-A(3)) Accessible to Pedestrians Only: *Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet."*

The AT&T service line at 106 El Toyonal in Orinda (Location 17) is low.

7. 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."

7.1. There is an abandoned AT&T service line hanging on the pole at 3616 Walnut St in Lafayette (Location 29).
7.2. There is an abandoned AT&T service line hanging on tree at 2290 Franklin Canyon Rd in Martinez (Location 51).

8. GO 95, Rule 86.2, Guys, 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."

8.1. The anchor guy on the pole at GPS coordinates 37.8966, -122.112 in Lafayette (Location 32) is slacked.
8.2. The anchor guy on the pole at 5346 Alhambra Valley Rd in Martinez (Location 41) is slacked.
8.3. Tree causing significant strain to anchor guy on the pole at 2290 Franklin Canyon Rd in Martinez (Location 51).
8.4. The anchor guy on the pole at 2410 Colina Ct in Pinole (Location 55) is slacked.
8.5. The anchor guy on the pole at Nortonville Rd and Kirker Pass Rd in Pittsburg (Location 77) is broken.

8.6. The anchor guy on the pole at GPS coordinates 37.8732, -121.699 in Brentwood (Location 87) is slacked.
8.7. The anchor guy on the pole located across from 130 Walnut Blvd in Brentwood (Location 90) is slacked.
8.8. The anchor guy on the pole at 3845 Camino Diablo in Byron (Location 96) is slacked.

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

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

AT&T's anchor guy is contacting an AT&T service line at GPS coordinates 37.8966, -122.112 in Lafayette (Location 32).

10. GO 128, Rule 17.1, 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.*
>
> *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 [the] communication or supply lines and equipment."*

The AT&T equipment box at Laurel Knoll Dr and Muir Station Rd in Martinez (Location 48) is damaged.

11. GO 128, Rule 42.7, 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)."*

11.1. The handhole lid and neck at 3710 Alhambra Way in Martinez (Location 49) are damaged.
11.2. The handhole lid at 2731 Doidge Ave in Pinole (Location 54) is damaged.
11.3. There is a temporary wooden handhole lid at 71 Leeward Way in Pittsburg (Location 74).

12. GO 95, Rule 91.3-B, Location of Steps states in part:

> *"The lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step."*

The pole step at 5590 Sobrante Ave in El Sobrante (Location 59) is low.

13. GO 128, Rule 43.3-C(1), Depths states:

> *"Buried communication cables shall be installed at a minimum depth of 12 inches below sidewalks, parkways, and private property."*

A section of an AT&T underground cable is above ground near the pole at GPS coordinates 38.0113, -121.997 in Concord (Location 66).

14. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1 Case 3 Column B states:

> *"The minimum allowable vertical clearance of communication conductors crossing thoroughfares in rural districts is 18 feet."*

AT&T's line at GPS coordinates 37.998016, -121.85969 in Pittsburg (Location 79) is low.

15. 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."*

The anchor guy on the pole located 1 pole south of Location 87 in Brentwood (Location 88) is missing a guy marker.

V. Observations

1. ESRB observed a significant number of buddy poles from Vasco Rd and Camino Diablo to Walnut Blvd and Camino Diablo in Byron.

2. ESRB observed the following third-party potential safety concerns during the field inspection:

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."*

2.1. Vegetation is causing strain/abrasion on a PG&E service line and cable tv line at 3705 Norris Canyon Rd in San Ramon (Location 4).
2.2. The cable tv riser on the pole at GPS coordinates 37.7634, -121.983 in San Ramon (Location 7) is missing a cover.
2.3. Vegetation is causing strain/abrasion on a cable tv line at 102 Alice Ct in Danville (Location 10).
2.4. Vegetation is causing strain/abrasion on a cable tv line at 173 La Sonoma Way in Alamo (Location 13).
2.5. The PG&E primary anchor guy on the pole at GPS coordinates 37.8443, -122.028 in Alamo (Location 15) is broken and missing a guy marker.

2.6. A PG&E service line is less than 12 inches from cable tv service line at 110 El Toyonal in Orinda (Location 16).
2.7. The cable tv service line at 106 El Toyonal in Orinda (Location 17) is low.
2.8. The cable tv service line at 8 Vallecito Ln in Orinda (Location 20) is low.
2.9. A large limb is growing into the PG&E pole at Oak Knoll Rd & El Nido Ranch Rd in Lafayette (Location 28).
2.10. The PG&E pole at 3616 Walnut St in Lafayette (Location 29) is deteriorated and cracked at the top.
2.11. The cable tv ground wire is exposed and lashing wire is broken at 3616 Walnut St in Lafayette (Location 29).
2.12. The PG&E anchor guy on the pole at Herman Dr and Moraga Rd in Lafayette (Location 30) is missing a guy marker and has a tree growing into it.
2.13. The cable tv anchor guy on the pole at GPS coordinates 37.8966, -122.112 in Lafayette (Location 32) is slacked.
2.14. The cable tv ground wire on the pole at Perales St and Acalanes Ave in Lafayette (Location 35) is exposed.
2.15. A slacked secondary PG&E span guy is contacting an AT&T line and cable tv line at 1569 Rancho View Dr in Lafayette (Location 36).
2.16. A slacked cable tv line is contacting an AT&T line at 1569 Rancho View Dr in Lafayette (Location 36).
2.17. The PG&E and cable tv anchor guys on the pole at 5346 Alhambra Valley Rd in Martinez (Location 41) are slacked.
2.18. The PG&E pole at Alhambra Valley Rd and Pine Tree Trail in Martinez (Location 42) is leaning more than 10%.
2.19. Vegetation is causing strain/abrasion on a cable tv line at Alhambra Valley Rd and Pine Tree Trail in Martinez (Location 42).
2.20. Cable tv's facilities need to be transferred to the new pole at 1894 Enclave Pl in Concord (Location 44).
2.21. Cable tv's facilities need to be transferred to the new pole at Willow Terrace Townhomes in Concord (Location 45).
2.22. Cable tv's facilities need to be transferred to the new pole at GPS coordinates 37.9953, -122.148 in Martinez (Location 50).
2.23. The cable tv ground wire is exposed and ground molding is damaged on the pole at GPS coordinates 37.9979, -122.159 in Martinez (Location 53).
2.24. The PG&E anchor guy on the pole at 2410 Colina Ct in Pinole (Location 55) is slacked, missing a guy marker, and has vegetation contact above the guy insulator.
2.25. The cable tv anchor guy on the pole at 2410 Colina Ct in Pinole (Location 55) is slacked.
2.26. The PG&E pole at 3150 11th St in San Pablo (Location 61) is overloaded per AT&T pole loading calculations.
2.27. The PG&E pole at 1111 Stonington Ave in San Pablo (Location 62) is deteriorated and has a pole top extension.
2.28. Cable tv's facilities need to be transferred to the new pole at 294 Curry St in Richmond (Location 63).
2.29. The PG&E secondary crossarm on the pole at 99 Anchor Dr in Bay Point (Location 70) is deteriorated, cracked, and bending.
2.30. There is a temporary wooden lid on a cable tv handhole at 71 Leeward Way in Pittsburg (Location 74).

2.31. The PG&E pole on Nortonville Rd in Pittsburg (Location 75) is leaning more than 10%.
2.32. A cable tv underground line is on the ground and anchor guy is slacked on Nortonville Rd in Pittsburg (Location 76).
2.33. A cable tv underground line is on the ground at Nortonville Rd and Kirker Pass Rd in Pittsburg (Location 77).
2.34. The PG&E secondary line and cable tv line at GPS coordinates 37.998016, -121.85969 in Pittsburg (Location 79) are low.
2.35. There is an abandoned cable tv service line hanging off the pole at 553 3rd St in Brentwood (Location 83).
2.36. Cable tv's facilities need to be transferred to the new pole at Chesnut St and Third St in Brentwood (Location 84).
2.37. There is an abandoned cable tv service line at 3845 Camino Diablo in Byron (Location 96).
2.38. Cable tv's facilities need to be transferred to the new pole at 3745 Camino Diablo in Byron (Location 97).
2.39. A slacked cable tv line is contacting an AT&T line located 2 poles north of Location 97 in Byron (Location 99).
2.40. The cable tv riser located 3 poles north of Location 97 in Byron (Location 100) is not attached to the pole and is missing a riser cover.