STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

November 15, 2022 CA2022-1017

John Gutierrez
Senior Director- Government Affairs
Comcast

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Comcast's South Valley Region

Dear Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Stephen Lee and Monica Hoskins of ESRB staff conducted a CIP audit of Comcast's South Valley Region from September 26, 2022, through September 30, 2022. During the audit, ESRB staff conducted field inspections of Comcast's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations is enclosed.

Please provide a response no later than December 13, 2022, via electronic copy of all corrective actions and preventive measures taken by Comcast to correct the identified violations and prevent the recurrence of such violations and observations. The response should indicate the date of each remedial action and preventive measure taken for the violations and observations. For any outstanding items not addressed, please provide the projected completion dates of Comcast's corrective actions.

If you have any questions concerning this audit, please contact Stephen Lee at (916) 661-2353 or stephen.lee@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 of Comcast South Valley Region

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
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CPUC AUDIT FINDINGS OF

COMCAST SOUTH VALLEY REGION

SEPTEMBER 26 – 30, 2022

I. Records Review

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

- The U-Safe Program, General Order (GO) 95/128 Repair and Reporting Documentation, version March 2, 2010.
- GO 95 Training Procedures as of September 2022 for Visual Inspections of Overhead Lines.
- GO 128 Training Procedures as of September 2022 for Visual Inspections of Underground Vaults, Handholes, and Pedestals.
- South Valley Region Facility Statistics as of September 2022, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- South Valley Region Facility and Fire Tier Maps as of September 2022.
- South Valley Region Work Order List containing data of facility locations, overhead or underground facility types, identified deficiencies, repair priority levels, corrective action due dates, and work completion dates from June 2017 through June 2022.
- South Valley Region Inspection Data containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings from June 2017 through June 2022.
- Safety Hazards Notifications Comcast Received from Third Party Utilities from June 2017 through June 2022.
- Safety Hazard Notifications Comcast Sent to Third Party Utilities from June 2017 through June 2022.
- South Valley Region Pole Loading Analysis Projects List from June 2021 through June 2022.
- South Valley Region Pole Loading Analysis and Safety Factor Calculation Samples from June 2021 through June 2022.
- Comcast's South Valley Region Employee Training Statistics, Training Schedules, and Training Materials from January 2021 through August 2022. This data consisted of lists of Comcast inspectors, technicians, pole loading engineers, spreadsheets of scheduled and completed training records, and copies of employee training materials used to train inspectors how to perform inspections and identify facility deficiencies.

II. Records Violations

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

1. **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."*

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."*

Comcast only conducts detailed inspections of all its Communication Lines in High Fire Threat Districts (HFTD). For Communication Lines outside of HFTD, Comcast's inspection process is limited to times when a Comcast technician visits a customer's home for installation, repair, or other service. However, the facilities inspected during this process are limited to facilities one span in each direction from the location of the work. Therefore, ESRB determined that Comcast's inspection procedure fails to ensure that all its overhead and underground communication facilities located outside of the HFTD are inspected frequently and thoroughly per GO 95, Rules 31.2 and 80.1-A(2), and GO 128, Rule 17.2.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure Type	Address	City
1	Pole	2398 E Santa Fe Ave	Merced
2	Pole	One pole north of location 1	Merced
3	Pole	Two poles north of location 1	Merced
4	Pole	2404 6th Ave	Merced
5	Pole	599 E Santa Fe Ave	Merced
6	Pole	Across from 2404 6th Ave	Merced
7	Pole	644 Moomjean Ave	Merced
8	Pole	Across from 644 Moomjean Ave	Merced
9	Pole	4696 E Turner Ave	Fresno
10	Pole	724 N Sierra Vista Ave	Fresno
11	Pole	725 N Sierra Vista Ave	Fresno
12	Pole	739 N Sierra Vista Ave	Fresno
13	Pole	4704 E Thomas Ave	Fresno
14	Pole	4710 E Thomas Ave	Fresno
15	Pole	4718 E Thomas Ave	Fresno
16	Pole	4728 E Thomas Ave	Fresno
17	Pole	4740 E Thomas Ave	Fresno
18	Pole	737 N Recreation Ave	Fresno
19	Pole	Adjacent to 737 N Recreation Ave	Fresno
20	Pole	4852 E Brown Ave	Fresno
21	Pole	4866 E Brown Ave	Fresno
22	Pole	4874 E Brown Ave	Fresno
23	Pole	4886 E Brown Ave	Fresno
24	Pole	4892 E Brown Ave	Fresno
25	Vault (or handhole)	1625 E Bundy Ave	Clovis
26	Pedestal	1712 E Bundy Ave	Clovis
27	Pole	1126 Hoblitt Ave	Clovis
28	Pole	1209 Hoblitt Ave	Clovis
29	Pole	1239 Hoblitt Ave	Clovis
30	Pole	1255 Hoblitt Ave	Clovis
31	Pole	304 Sunnyside Ave	Clovis
32	Pole	1395 4th Street	Clovis
33	Pole	Second pole up the hill from 8180 Table Mountain Rd	Friant
34	Pole	First pole up the hill from 8180 Table Mountain Rd	Friant

35	Pole	8180 Table Mountain Rd (36.985990, -119.638429)	Friant
36	Pole	8188 Table Mountain Rd	Friant
37	Pole	8188A Table Mountain Rd	Friant
38	Pole	3910 Marcus Ave	Friant
39	Pole	3950 Marcus Ave	Friant
40	Pole	Across from 3959 Marcus Ave	Friant
41	Pole	3980 Marcus Ave	Friant
42	Pole	Alley of 3085 E Weldon Ave	Fresno
43	Pole	Alley of 3075 E Weldon Ave	Fresno
44	Vault Pole	370 W Beacon Ave	Tulare
45	Vault	306 1/2 W Beacon Ave	Tulare
46	Pedestal	306 2/2 W Beacon Ave	Tulare
47	Pole	380 W Beacon Ave	Tulare
48	Pole	398 W Beacon Ave	Tulare
49	Pole	401 Spruce St	Tulare
50	Pole	1396 E Kern Ave	Tulare
51	Pole	Rear of 1396 E Kern Ave	Tulare
52	Pole	Rear of 1370 E Kern Ave	Tulare
53	Pole	Rear of 1336 E Kern Ave	Tulare
54	Pole	Rear of 1300 E Kern Ave	Tulare
55	Pole	1301 E Kern Ave	Tulare
56	Pole	1353 E Kern Ave	Tulare
57	Vault	401 Spruce St	Tulare
58	Vault	3501 W Fairview Ave	Visalia
59	Vault	3435 W Fairview Ave	Visalia
60	Vault	Between 3405 and 3415 W Fairview Ave	Visalia
61	Pedestal	3345 W Fairview Ave	Visalia
62	Vault	Across from 1007 Wellsley St	Visalia
63	Pole	Across from 108 E Hanford Armona Rd	Hanford
64	Pole	Across from 100 E Hanford Armona Rd	Hanford
65	Pole	10435W Hanford Armona Rd	Hanford
66	Pole	10443 W Hanford Armona Rd	Hanford
67	Pole	102 W Lang St	Hanford
68	Pole	576A S Douty St	Hanford
69	Pole	Behind 600 S Douty St	Hanford
70	Pedestal	906 E Palm Dr	Hanford
71	Pedestal	912 E Palm Dr	Hanford
72	Vault	28167 Possy Ave	Madera
73	Vault	28139 Possy Ave	Madera

74	Vault	28177 Possy Ave	Madera
75	Vault	28195 Possy Ave	Madera
76	Pole	1403 Sunrise Ave	Madera
77	Pole	1316 Sunrise Ave	Madera
78	Pole	1412 Sunrise Ave	Madera
79	Vault	1412 Sunrise Ave	Madera
80	Pedestal	915 Lilly St	Madera
81	Pedestal	855 Lilly St	Madera
82	Pedestal	861 Lilly St	Madera
83	Pole	Alley of 1634 7th St	Firebaugh
84	Pole	Alley of 1635 8th St	Firebaugh
85	Pole	1641 8th St	Firebaugh
86	Pole	1635 8th St	Firebaugh
87	Pole	807 P St	Firebaugh
88	Pad Mounted Power Supply	811 N Clyde Fannon Rd	Firebaugh
89	Pole	1972N St, Pole 4 on Pole Loading Job JB645605	Firebaugh
90	Pole	1972N St, Pole 5 on Pole Loading Job JB645605	Firebaugh
91	Pole	Rear of 690 Oller St	Mendota
92	Pole	One pole northwest of Location 91	Mendota
93	Pole	Two poles northwest of Location 91	Mendota
94	Pole	Rear of 642 Oller St	Mendota
95	Pole	Rear of 650 Oller St	Mendota
96	Pole	1599 5th St (36.755790, -120.381833)	Mendota
97	Pedestal	166 S Madera Ave, Rear of Unit 98	Kerman
98	Pedestal	166 S Madera Ave, Rear of Unit 29	Kerman
99	Pole	NW corner of the intersection of S Kline St and Alley of 170 S Madera Ave	Kerman
100	Pole	SW corner of the intersection of S Kline St and Alley of 170 S Madera Ave	Kerman
101	Pole	166 S Madera Ave, W of Unit 1	Kerman
102	Pole	17024 S Mercey Springs St	Los Banos
103	Pole	Across from 17024 S Mercey Springs St	Los Banos
104	Pole	One pole north of Location 103	Los Banos
105	Pole	Intersection of Pioneer Rd and Mercey Springs Rd	Los Banos
106	Pedestal	1832 Brooks Dr	Los Banos
107	Vault	1822 Brooks Ct	Los Banos
108	Vault	1818 Brooks Ct	Los Banos

109	Vault	1808 Brooks Ct	Los Banos
110	Pole	837 Miller Ln	Los Banos
111	Pole	825 Miller Ln	Los Banos
112	Pole	805 Miller Ln	Los Banos
113	Pole	1645 Canal Farm Ln	Los Banos
114	Pole	1639 Canal Farm Ln	Los Banos
115	Pole	1629 Canal Farm Ln	Los Banos
116	Pole	1548 Canal Farm Ln	Los Banos
117	Pole	1521 Canal Farm Ln	Los Banos
118	Pole	1548 Canal Farm Ln, near the west apartment gate	Los Banos
119	Pole	1527 Canal Farm Ln	Los Banos
120	Pole	1525 Canal Farm Ln	Los Banos
121	Pole	1509 Canal Farm Ln	Los Banos

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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."*

ESRB's findings are listed in Table 1:

Table 1: GO 95, Rule 31.1 Findings

Location #	Findings
13	The inner conductor on the Comcast coaxial cable service drop is exposed and coming out of its insulation.
33	The old wooden pole that supports only Comcast facilities is filled with woodpecker holes and needs to be transferred to the new Pacific Gas and Electric (PG&E) joint pole.
63	The lashing wire on the Comcast cable span is damaged.
121	The lashing wire on the Comcast cable span is damaged.

2. **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."*

ESRB's findings are listed in Table 2:

Table 2: GO 95, Rule 31.6 Findings

Location #	Findings	Notes
8	There is an abandoned Comcast service drop hanging on the pole.	N/A
44	There is an abandoned Comcast service drop hanging on the pole's crossarm.	N/A

Location #	Findings	Notes
48	There is an abandoned Comcast service drop hanging near the pole's top pole step.	N/A
52	There are two abandoned Comcast service drops. One at the pole and one midspan between Location 52 and 53.	Comcast removed both abandoned service drops during the audit.
95	There is an abandoned Comcast service drop hanging midspan between Locations 95 and 96.	N/A
110	There is an abandoned Comcast bonding wire that is cut and not bonded to any equipment or grounding wires.	N/A

3. 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."

ESRB's finding is listed in Table 3:

Table 3: GO 95, Rule 35 Findings

Location #	Findings
9	Vegetation is causing strain on the Comcast cable span.

4. **GO 95, Rule 38, Table 2, Case 16.C** requires the following:

   Radial separation of conductors on same crossarm, pole or structure between conductors, taps or lead wires of different circuits requires at least three inches of separation from communication conductors.

   ESRB's finding is listed in Table 4:

Table 4: GO 95, Rule 38 Findings

Location #	Findings
65	The Comcast communication conductors are contacting different companies' communication circuits.

5. **GO 95, Rule 38, Table 2, Case 18.C** requires the following:

   Radial separation between guys and span wires passing conductors supported on the same poles requires at least three inches of separation from communication conductors.

   ESRB's finding is listed in Table 5:

Table 5: GO 95, Rule 38 Findings

Location #	Findings
87	The three span guys that are supported on the same poles are contacting each other and Comcast communication lines.

6. **GO 95, Rule 83.4, Bonding** states:

   "When separate communication messengers, or guys, or both, of the same or different ownership, are attached to the same pole, and they are in proximity to electric supply circuits (see Rule 21.5- D), railway signal circuits or Class T electric railway or trolley circuits, such messengers, or guys, or both, shall be bonded together at frequent intervals (see Rule 83.4-A). For purposes of this rule, communication messengers and guys are those which support Class C Circuits (see Rule 20.6) and those Class C Circuits which are used for television transmission."

   ESRB's finding is listed in Table 6:

Table 6: GO 95, Rule 83.4 Findings

Location #	Findings
85	The bonding wire between the Comcast and American Telephone and Telegraph (AT&T) communication messengers is severed.

7. **GO 95, 84.6.B, 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)."*

ESRB's findings are listed in Table 7:

Table 7: GO 95, Rule 84.6 Findings

Location #	Findings
16	The vertical ground molding is separated from the pole and exposes the ground wire.
18	The vertical ground molding is damaged and exposed the ground wire.
40	The top half of the vertical ground molding is damaged and exposes the ground wire.
41	The vertical ground molding is separated from the pole and exposes the ground wire.
51	The bottom section of the vertical ground molding is damaged and exposes the ground wire.
54	The top section of the vertical ground molding is damaged and exposes the ground wire.
55	The bottom section of the vertical ground molding does not cover the ground wire.
67	The vertical ground molding is missing securing bolts and does not cover at least seven feet from the ground surface.
83	The middle section of the vertical ground molding is damaged and exposes the ground wire.

Location #	Findings
85	The bottom section of the vertical ground molding exposes the ground wire.
88	The bottom section of the vertical ground molding exposes the ground wire.
91	The bottom section of the vertical ground molding exposes the ground wire. The ground wire also partially wraps around the bottom of the pole and is not buried in the ground.
95	The bottom section of the vertical ground molding is cracked.
96	The vertical ground molding is damaged and exposes the ground wire.
99	The vertical ground molding is damaged near eye level and exposes the ground wire.
103	The bottom section of the vertical ground molding exposes the ground wire.
115	The bottom section of the vertical ground molding is damaged and exposes the ground wire.
120	The vertical ground molding is damaged and requires repair.

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."*

ESRB's findings are listed in Table 8:

Table 8: GO 95, Rule 86.2 Findings

Location #	Findings
15	The anchor guy is cut and spooled on the top pole step of the pole.
18	The anchor guy is slacked.
37	The anchor guy is slacked.
54	The anchor guy is not attached to an anchor.
68	The anchor guy is slacked.
92	The anchor guy is slacked.
105	The anchor guy is slacked.
118	The anchor guy is severed and needs to be replaced.

9. GO 95, Rule 86.7.B, Location of Sectionalizing Insulators, Anchor Guys states in part:

> *"An insulator shall be installed in each anchor guy which is required to be sectionalized by Rule 86.6–B2, so that such insulator is located not less than 8 feet above the ground and either 8 feet below the level of the lowest supply conductor or not less than 6 feet from surface of pole and not less than one foot below the level of the lowest supply conductor."*

ESRB's findings are listed in Table 9:

Table 9: GO 95, Rule 86.7 Findings

Location #	Findings
18	The anchor guy is missing a sectionalizing insulator.
41	The anchor guy is missing a sectionalizing insulator.
44	The anchor guy is missing a sectionalizing insulator.
92	The anchor guy is missing a sectionalizing insulator.
95	The anchor guy is missing a sectionalizing insulator.
96	The anchor guy is missing a sectionalizing insulator.
101	The anchor guy is missing a sectionalizing insulator.
103	The anchor guy is missing a sectionalizing insulator.
105	The anchor guy is missing a sectionalizing insulator.
112	The anchor guy is missing a sectionalizing insulator.
116	The anchor guy is missing a sectionalizing insulator.

10. GO 95, Rule 86.9, Guy Marker (Guy Guard) states in part:

> *"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."*

ESRB's finding is listed in Table 10:

Table 10: GO 95, Rule 86.9 Findings

Location #	Findings
18	The Comcast anchor guy is missing a guy marker.

11. 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"*

ESRB's findings are listed in Table 11:

Table 11: GO 95, Rule 87.7 Findings

Location #	Findings
37	The vertical metallic riser is not properly secured to the pole and exposes the Comcast riser cable.
49	The bottom half of the vertical riser cover is damaged and exposes the Comcast riser cable.
100	The vertical riser cover is not properly secured to the pole and exposes the Comcast riser cable.

12. GO 95, Rule 92.4.B, Grounding, Applicability states in part:

> *"The grounding of exposed communication cable systems includes cables with metallic shields, sheaths, or messenger(s). The isolating of exposed guys includes both overhead and anchor guys. Exposed communication cable systems are those that are subject to power contacts, power induction, or lightning."*

ESRB's findings are listed in Table 12:

Table 12: GO 95, Rule 92.4 Findings

Location #	Findings
9	The vertical ground wire is cut and missing from ground level to about six feet up the pole.
12	The vertical ground wire is cut and missing from ground level to about three feet up the pole.
27	The ground wire for the overhead amplifier is cut.

13. GO 95, Rule 92.4.C,(2), Ground Rods (Ground Electrodes) states in part:

> *"c) Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground."*

ESRB's finding is listed in Table 13:

Table 13: GO 95, Rule 92.4 Findings

Location #	Findings
51	The ground rod is exposed above ground.

14. 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."*

ESRB's finding is listed in Table 14:

Table 14: GO 128, Rule 17.1 Findings

Location #	Findings
46	The dirt around the lip of the pedestal prevents proper securement of the pedestal lid.

15. GO 128, Rule 42.4, Manholes and Handholes, Size and Shape states in part:

> *"Manholes shall be constructed to provide sufficient working space so that the cables and equipment therein can be properly and safely installed, supported, operated and maintained."*

ESRB's findings are listed in Table 15:

Table 15: GO 95, Rule 42.4 Findings

Location #	Findings	Notes
44	The vault is completely filled with dirt, which prevents sufficient working space to operate and maintain the equipment.	The vault at this location may be abandoned.
57	The vault is completely filled with dirt, which prevents sufficient working space to operate and maintain the equipment.	N/A

16. 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)."*

ESRB's findings are listed in Table 16:

Table 16: GO 128, Rule 42.7 Findings

Location #	Findings
60	The vault lid is unable to securely close.
62	The vault lid is unable to open, and the vault enclosure is not level with the walking surface.
74	The vault lid is damaged.
75	The vault and vault lid are damaged.

V. Observations

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

   (2) "Where a communications company's or an electric utility's (Company A's) actions result in potential violations of GO 95 for another entity (Company B), that entity's (Company B's) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

   (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.

Table 17 includes all non-Comcast (third party) findings that ESRB observed during the audit. ESRB witnessed Comcast created and sent third party notifications to the respective utilities for each observed finding. No follow-up from Comcast is required for the items below:

Table 17: Observations

Location #	Findings
6	The AT&T anchor guy is missing a sectionalizing insulator and the anchor guy marker is damaged.
7	The PG&E secondary insulators are tilted at a severe angle, indicating a possible rotten crossarm or damaged insulator pins. There is an abandoned AT&T service drop.
8	There is an abandoned AT&T service drop.

Location #	Findings
10	The AT&T anchor guy is missing a guy marker.
13	The AT&T service drop is in contact with the anchor guy and is also contacting Comcast's facilities.
14	There is an abandoned AT&T service drop.
16	There is a low AT&T phone cable.
20	The PG&E pole step is bent.
22	The PG&E secondary insulators are tilted at a severe angle.
24	The AT&T ground molding is damaged.
31	The PG&E riser cover is damaged and exposes the insulated conductor.
38	The PG&E ground molding is damaged.
39	The AT&T anchor guy is missing a guy marker. There is also an unauthorized attachment (a loose chain) hanging on the anchor guy. The pole step is also less than eight feet from the ground line.
40	The PG&E pole is deforming in the direction of the overhead transformer, indicating a potential pole overload. There is also a cut tree branch stuck in the PG&E span guy wire.
42	The PG&E pole is burned and possibly overloaded. The AT&T down guy is not attached to any anchor.
43	The PG&E ground molding is damaged.
46	The Southern California Edison (SCE) secondary crossarm has a bird's nest.
47	There is an abandoned AT&T service drop.
48	There is an abandoned AT&T service drop.
49	The AT&T ground molding is damaged.
50	The AT&T ground molding is damaged.
53	There is an abandoned AT&T service drop.
54	The AT&T splice box is damaged. The SCE anchor guy is rusted.
56	The AT&T riser cover is missing, and the riser cable is not completely buried in the ground.
63	The AT&T riser cover is damaged. The AT&T telephone span has a damaged lashing wire.
64	The AT&T facilities require a pole transfer to the new joint pole.

Location #	Findings
66	The AT&T riser cover is damaged.
68	The SCE anchor guy is slacked.
71	The AT&T pedestal is damaged.
78	The AT&T riser cover is damaged
83	The AT&T anchor guy is slacked. The PG&E pole is bending greater than 10%.
84	The PG&E vertical riser is not secured to the pole.
85	The AT&T ground molding is damaged.
90	The PG&E ground molding is damaged.
92	The AT&T phone riser is not properly secured to the pole.
94	The AT&T ground molding is damaged.
103	The PG&E anchor guy marker is loose.
104	There are unauthorized attachments (various advertisement signs) on the PG&E pole.
105	The AT&T anchor guy is loose and missing a sectionalizing insulator.
111	The AT&T pole step is too low to the ground surface and one of the pole steps is damaged.
112	The AT&T anchor guy is missing a sectionalizing insulator.
113	The AT&T ground molding is damaged. The AT&T anchor guy is missing a sectionalizing insulator.
116	The PG&E down guy is contacting a metal fence.