

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 27, 2023

CA2022-940

Stephen Kukta
Director Regulatory Affairs
T-Mobile
45750 Cielito Drive
Indian Wells, CA 92210

SUBJECT: Audit of T-Mobile Orange County Region

Mr. Kukta:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Eric Ujjiye and Kyle King of my staff conducted a Communication Infrastructure Provider (CIP) audit of T-Mobile's Orange County Region from September 26, 2022, to September 30, 2022. The audit included a review of T-Mobile's records and field inspections of T-Mobile's 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 advise me no later than February 27, 2022, by electronic or hard copy, of all the corrective measures taken by T-Mobile to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Eric Ujjiye at (213) 620-2598 or eric.ujjiye@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
Eric Ujjiye, Utilities Engineer, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

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

II. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Site Id	Type of Structure	Location
1	LA33845C	Cellular Site	Santa Ana
2	LA33514C	Cellular Site	Santa Ana
3	LA33810G	Cellular Site	Santa Ana
4	LA33268B	Cellular Site	Santa Ana
5	LA33825A	Cellular Site	Santa Ana
6	LA33827A	Cellular Site	Santa Ana
7	LA23645A	Cellular Site	Santa Ana
8	LA33319B	Cellular Site	Westminster
9	LA02947A	Cellular Site	Westminster
10	LA33493C	Cellular Site	Costa Mesa
11	LA02538A	Cellular Site	Aliso Viejo
12	LA02847C	Cellular Site	Laguna Niguel
13	LA02971F	Cellular Site	Laguna Niguel
14	LA33451B	Cellular Site	Laguna Niguel
15	LA33446C	Cellular Site	Laguna Niguel
16	LA33445A	Cellular Site	Laguna Niguel
17	LA33444A	Cellular Site	Laguna Niguel
18	LA23192C	Cellular Site	Laguna Niguel
19	LA33441E	Cellular Site	Laguna Niguel
20	LA02877C	Cellular Site	Laguna Niguel
21	LA33867B	Cellular Site	Laguna Niguel
22	LA02841C	Cellular Site	Laguna Niguel
23	LA02973D	Cellular Site	Laguna Niguel
24	LA33483B	Cellular Site	Laguna Niguel
25	2146071E	Pole	Irvine
26	1247633E	Pole	Irvine
27	1115215E	Pole	Irvine
28	1115216E	Pole	Irvine
29	1247634E	Pole	Irvine
30	1115218E	Pole	Irvine
31	1115219E	Pole	Irvine
32	4255799E	Pole	Irvine
33	4232496E	Pole	Irvine
34	1419456E	Pole	Irvine
35	1419457E	Pole	Irvine
36	4537118E	Pole	Irvine

37	4877756E	Pole	Irvine
38	4741311E	Pole	Irvine
39	1419548E	Pole	Irvine
40	1106938E	Pole	Irvine
41	4622162E	Pole	Irvine
42	4622161E	Pole	Irvine
43	4622159E	Pole	Irvine
44	4622158E	Pole	Irvine
45	4622157E	Pole	Irvine
46	4622156E	Pole	Irvine
47	1625998E	Pole	Irvine
48	4617604E	Pole	Irvine
49	4909793E	Pole	Irvine
50	PTC00024	Pole	Irvine
51	4327755E	Pole	Irvine
52	0636XC501	Pole	Irvine

III. Field Inspection Violations List

We observed the following violations during the field inspections:

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.

T-Mobile failed to report the following safety hazards during its previous inspection:

- Site ID LA025338A: on Pole 4190031E, there was a damaged third-party ground moulding, exposing the ground wire.
- Pole 487756E: there was an exposed third-party ground wire supported on the pole.

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.

A T-Mobile antenna attached to Pole 4877756E was not transferred from a “buddy pole”.

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.

The following T-Mobile facilities were permanently abandoned but not removed:

- Pole 1419547E: a down guy anchor was abandoned near the pole.
- Pole 4741311E: a detached antenna was abandoned on a “buddy pole” adjacent to this pole.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8 requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

The T-Mobile conductor span attached to Pole 4232496E at midspan was contacting the underbuilt communication company conductor.

GO 95, Rule 84.6-B, Ground Wires, states in part:

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.

The ground moulding attached to Pole 10242PBM (Site LA33514C) was damaged, exposing the ground wire.

GO 95, Rule 92.4-C2e: Grounding, states in part:

*Ground Rods (Ground Electrodes): Ground rods on the communication messenger system(s) shall conform to each of the following requirements.
e) The driven ground rod(s), pipe(s), or equivalent shall be located 24 inches or more from the surface of the pole.*

A ground rod was installed closer than the minimum 24 inches to the surface of Pole 4877756E.

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.

The following T-Mobile facilities needed maintenance:

- Site LA33441E: an electrical panel within the site’s vault had water damage.
- Site LA33845C: a cabinet containing an electrical supply meter had a loose, damaged panel.
- Site LA02841C: one of the two ventilation fans located within the site’s vault was not functioning.
- Site LA02973D: a grounding bus bar within the site’s vault was corroded.
- Site LA02973D: water was seeping into the electrical panel within the site’s vault, causing water damage to the electrical panel.