STATE OF CALIFORNIA Gavin Newsom, *Governor*
PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 16, 2022 CA2022-946

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

SUBJECT: Audit of T-Mobile Los Angeles County Region

Mr. Kukta:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Stacey Ocampo and Mily Vaidya of my staff conducted a Communication Infrastructure Provider (CIP) audit of T-Mobile's Los Angeles County Region from July 18, 2022 to July 22, 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 October 17, 2022 by electronic or hard copy, of all corrective measures taken by T-Mobile to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Stacey Ocampo at (213) 266-4712 or Stacey.Ocampo@cpuc.ca.gov.

Sincerely,

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
Majed Ibrahim, Senior Utilities Engineer, Electric Safety and Reliability Branch, CPUC
Stacey Ocampo, Utilities Engineer, Electric Safety and Reliability Branch, 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
- T-Mobile's documented inspection program

II. Field Inspection

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

No.	Structure Number	Type of Structure	City
1	149016M	Pole	Los Angeles
2	367372M	Pole	Los Angeles
3	19323G	Pole	Los Angeles
4	710844H	Pole	Los Angeles
5	400125M	Pole	Los Angeles
6	542894H	Pole	Los Angeles
7	18894G	Pole	Los Angeles
8	18895G	Pole	Los Angeles
9	18896G	Pole	Los Angeles
10	372896M	Pole	Los Angeles
11	230933M	Pole	Los Angeles
12	230937M	Pole	Los Angeles
13	10179PPM	Pole	Los Angeles
14	SV11569J	Vault	Los Angeles
15	SV11569J	Pedestal	Los Angeles
16	10129PBM	Pole	Los Angeles
17	10132PBM	Pole	Los Angeles
18	10059PBM	Pole	Los Angeles
19	IE05095B	Vault	Pasadena
20	IE05095B	Handhole	Pasadena
21	LA13129E	Vault	Carson
22	92269M	Pole	Carson
23	LA13129E	Pedestal	Carson
24	10149PBM	Pole	Los Angeles
25	LA03318F	Pedestal	Los Angeles
26	LA03318F	Vault	Los Angeles
27	10141PBM	Pole	Los Angeles
28	SV11374E	Pedestal	Los Angeles
29	SV11374E	Vault	Los Angeles
30	SV00587C	Pedestal	Los Angeles
31	SV00587C	Vault	Los Angeles
32	10094PBM	Pole	Los Angeles
33	413880M	Pole	Windsor Hills
34	LA03328F	Pedestal	Windsor Hills
35	LA03328F	Vault	Windsor Hills

No.	Structure Number	Type of Structure	City
36	LA33376C	Pedestal	Los Angeles
37	10184PBM	Pole	Los Angeles
38	LA33376C	Vault	Los Angeles
39	292307M	Pole	Silverlake
40	292308M	Pole	Silverlake
41	00280ATC	Pole	Silverlake
42	292310M	Pole	Silverlake
43	292311M	Pole	Silverlake
44	292312M	Pole	Silverlake
45	300414M	Pole	Silverlake
46	300415M	Pole	Silverlake
47	300416M	Pole	Silverlake
48	418881M	Pole	Silverlake
49	300418M	Pole	Silverlake
50	300419M	Pole	Silverlake
51	417318M	Pole	Silverlake
52	427558M	Pole	Silverlake
53	427557M	Pole	Silverlake
54	427556M	Pole	Silverlake
55	427555M	Pole	Silverlake
56	274936M	Pole	Silverlake
57	467211M	Pole	Silverlake
58	388478M	Pole	Silverlake
59	374583M	Pole	Silverlake
60	372078M	Pole	Silverlake
61	372077M	Pole	Silverlake
62	372076M	Pole	Silverlake
63	261899M	Pole	Silverlake
64	404193M	Pole	Silverlake
65	367951M	Pole	Silverlake
66	263001M	Pole	Silverlake
67	263002M	Pole	Silverlake
68	343898M	Pole	Silverlake
69	425308M	Pole	Silverlake
70	263004M	Pole	Silverlake
71	1027145H	Pole	Silverlake
72	1025354H	Pole	Silverlake
73	1025337H	Pole	Silverlake
74	411648M	Pole	Silverlake

No.	Structure Number	Type of Structure	City
75	90026 Sunset Blvd	Pole	Silverlake
76	678042H	Pole	Silverlake
77	632868H	Pole	Silverlake
78	429123M	Pole	Silverlake
79	Across 3200 Sunset Blvd	Pole	Silverlake
80	Front of 3225 Sunset Blvd	Pole	Silverlake
81	7048M	Pole	Silverlake
82	7047M	Pole	Silverlake
83	428257M	Pole	Silverlake
84	7046M	Pole	Silverlake
85	341314M	Pole	Silverlake
86	36531H	Pole	Silverlake
87	459943H	Pole	Silverlake
88	735255H	Pole	Silverlake
89	435727H	Pole	Silverlake
90	85217M	Pole	Silverlake
91	801279H	Pole	Silverlake
92	706171H	Pole	Silverlake
93	801280H	Pole	Silverlake
94	706172H	Pole	Silverlake
95	312156M	Pole	Silverlake
96	525452M	Pole	Silverlake
97	Serrano Ave & Fountain Ave	Pole	Silverlake
98	330653M	Pole	Silverlake
99	525453H	Pole	Silverlake
100	525454H	Pole	Silverlake
101	769124H	Pole	Silverlake
102	525455H	Pole	Silverlake

III. Field Inspection – Violations List

My staff observed the following violations during the field inspections portion of the audit:

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.*

T-Mobile's facilities on each of the following poles required maintenance:

- 7047M – Incomplete pole transfer
- 372896M – A T-Mobile lashing wire was broken.
- 341314M - A T-Mobile lashing wire was broken.

GO 95, Rule 56.2, Uses (Guy Wires), 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.*

The T-Mobile down guy wire attached to each of the following poles was not taut:

- 10141PBM
- 341314M

General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19, Column C, requires *a minimum of 3 inches radial separation between communication cables and guy wires.*

The radial separation between T-Mobile guy wire and a third-party communications conductor on pole 372896M was less than 3 inches.

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

> *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).*

T-Mobile communications conductors attached to the following poles 1027145H was strained by vegetation:

- 1027145H
- 429123M

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, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.*

The ground moulding attached to pole 10132PBM was damaged.

GO 95, Rule 38, Table 2, Case 8, Column C requires *the minimum vertical separation between communications conductors on separate crossarms or other supports at different levels on the same pole and in adjoining midspans to be 12 inches.*

The separation between T-Mobile communications conductors and a third-party communications conductor on pole 292308M had less than 12 inches of vertical separation.

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.*

- Site ID LA03328F - The lock securing the vault lid for was inoperable.
- Site ID LA03318F - The AC unit alarm was not functioning.
- Site ID SV11374E - The AC unit alarm was not functioning.

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