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

September 19, 2023 CA2023-1161

John Gutierrez
Senior Director- Government Affairs
Comcast

**SUBJECT**: Communications Infrastructure Provider (CIP) Audit of Comcast's North Bay Region

Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Monica Hoskins of ESRB staff conducted a CIP audit of Comcast North Bay Region from July 10 through July 14, 2023. 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 October 17, 2023 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.

If you have any questions concerning this audit, please contact Monica Hoskins at monica.hoskins@cpuc.ca.gov or (415) 652-1847.

Sincerely,

Rickey Tse, 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 North Bay Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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**COMCAST NORTH BAY REGION**
**COMMUNICATIONS AUDIT FINDINGS**
**JULY 10 – 14, 2023**

## I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Comcast's North Bay Region:

- The U-Safe Program, General Order (GO) 95/128 Repair and Reporting Documentation, version March 2, 2010.
- Facility statistics as of June 2023, including miles of overhead lines, miles of underground lines, number of poles, number of vaults, and number of pedestals.
- Overhead and Underground facility maps as of June 2023.
- Inspection and patrol records containing data for the inspected facility type, facility location, fire threat district location, inspection date, and resulting inspection findings and repairs from June 2018 through June 2023.
- Safety Hazards Notifications received from third-party utilities from June 2018 through June 2023.
- Safety Hazards Notifications sent to third-party utilities from June 2018 through June 2023.
- Pole loading calculations, including intrusive testing for Tier 2 and Tier 3 High Fire Threat Districts from June 2022 through June 2023.
- Employee statistics and employee training records from January 2021 through June 2023.
- Employee training materials, including the Comcast Outside Plant Handbook for Clearances and Regulations in California, contractor training PowerPoint on GO 95, and the Patrol Inspection Training Form.
- New construction projects from June 2022 through June 2023.

## II. Records Violations

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

1. **General Order (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 complete detailed inspections of their communication lines and assets in High Fire Threat Districts. In all other areas, inspections only take place during other scheduled work. When sending a technician into the field to investigate an issue, the technician inspects the assigned pole and the associated assets, along with one span in each direction. Comcast has no set schedule for detailed inspections and patrols that ensures all poles and assets are inspected thoroughly and completely as required by GO 95 and GO 128.

2. **GO 95, Rule 18-B, Maintenance Programs** states in part:

> *"Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.*
>
> *The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of*

*a potential violation of GO 95 or a Safety Hazard on the company's facilities."*

*(1) "Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.*

*a. 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."*

Comcast's *U-Safe Program: GO 95/128 Repair & Reporting Documentation* outlines the process for compliance reporting, documenting repairs, and reporting violations for technicians or contractors in the field. Upon arrival at the repair location, the technician will inspect the pole and one span to the left and right of the identified pole and report any violations. The technical uses the following to categorize the pole:

- P = Pass meaning there were no GO95/128 infractions at the assigned job.
- R = Repair meaning there were GO95/128 infractions that were corrected while on the job.
- F = Fail meaning that there were GO95/128 infractions that they could not fix in the time allotted for the job.

If a job is marked as Repair (R), the technician must document it with the appropriate completion code. If a job is marked as Fail (F), the technician must create an ER ticket, and if the work cannot be completed onsite, it will be assigned to the appropriate department.

However, Comcast's U-Safe program for maintenance and field repairs does not include the timelines required for completing infractions. The work orders and inspections provided to

ESRB include priority codes, but Comcast does not include the timelines associated with each priority code and how to assign the appropriate priority code to any nonconformances identified as required by GO 95.

Additionally, ESRB's review of Comcast's North Bay Division work orders from June 2018 through June 2023 found that Comcast completed a total of 1,716 work orders late. The North Bay Division covers five counties, including Marin, Mendocino, Napa, Solano, and Sonoma. Table 1 breaks down the total late work orders for the North Bay Division by county and priority level.

**Table 1: North Bay Division Late Work Orders**

| Priority Levels | Marin | Mendocino | Napa | Solano | Sonoma | Total |
|---|---|---|---|---|---|---|
| 1 | – | 6 | 10 | 5 | 142 | 163 |
| 2 | 444 | 156 | 450 | 25 | 467 | 1,542 |
| 3 | 3 | 4 | – | – | 4 | 11 |
| **Total** | 447 | 166 | 460 | 30 | 613 | **1,716** |

Table 1 includes both late completed work orders and the late pending work orders for each county. Late completed work orders are any work orders completed after their assigned due dates. Pending work orders are any work orders open with a due date prior to June 30, 2023, the date Comcast submitted the data to ESRB.

## III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

| Location | Structure Type | Address | City |
|---|---|---|---|
| **1** | Underground Pedestal | 12 Circulo Lujo | Rohnert Park |
| **2** | Underground Pedestal | 2 Circulo Lujo | Rohnert Park |
| **3** | Amplifier | 137 Parque Playa | Rohnert Park |
| **4** | Underground Pedestal | 4448 Hillview Way | Rohnert Park |
| **5** | Underground Pedestal | 4436 Hillview Way | Rohnert Park |
| **6** | Underground Pedestal | 4623 Heath Circle | Rohnert Park |
| **7** | Underground Node Box | 948 Hudis Street | Rohnert Park |
| **8** | Underground Pedestal | 949 Hudis Street | Rohnert Park |
| **9** | Underground Pedestal | 940 Hudis Street | Rohnert Park |
| **10** | Pole | 6233 Montecito Boulevard | Santa Rosa |
| **11** | Pole | 6221 Montecito Boulevard | Santa Rosa |
| **12** | Pole | 6221 Montecito Boulevard | Santa Rosa |
| **13** | Pole | 6263 Montecito Boulevard | Santa Rosa |
| **14** | Pole | 6263 Montecito Boulevard | Santa Rosa |
| **15** | Pole | 2650 Mill Creek Road | Ukiah |
| **16** | Pole | 2260 Peterson Lane | Ukiah |
| **17** | Pole | 2221 Peterson Lane | Ukiah |
| **18** | Pole | 3001 Mill Creek Road | Ukiah |
| **19** | Pole | Across from 3001 Mill Creek Road | Ukiah |
| **20** | Pole | 1141 West Standley Street | Ukiah |
| **21** | Pole | 1139 West Standley Street | Ukiah |
| **22** | Pole | 1150 West Standley Street | Ukiah |
| **23** | Pole | 1147 West Standley Street | Ukiah |
| **24** | Pole | Across from 1160 West Standley Street | Ukiah |
| **25** | Pole | 1164 West Standley Street | Ukiah |
| **26** | Pole | 616 Joseph Street | Ukiah |
| **27** | Pole | 620 Joseph Street | Ukiah |
| **28** | Pole | 626 Joseph Street | Ukiah |
| **29** | Pole | 1381 Park Terrace Court | Ukiah |
| **30** | Pole | 1401 Deerwood Drive | Ukiah |
| **31** | Pole | 6696 Central Avenue | Redwood Valley |
| **32** | Pole | One pole downstream from 6696 Central Avenue | Redwood Valley |
| **33** | Pole | Two poles downstream from 6696 Central Avenue | Redwood Valley |

| | | | |
|---|---|---|---|
| **34** | Pole | 6688 Central Avenue | Redwood Valley |
| **35** | Pole | 2601 Road E | Redwood Valley |
| **36** | Pole | 2651 Road E | Redwood Valley |
| **37** | Pole | 2671 Road E | Redwood Valley |
| **38** | Pole | Along the drive way at 2671 Road E | Redwood Valley |
| **39** | Pole | 20800 Locust Street | Willits |
| **40** | Pole | 20750 Locust Street | Willits |
| **41** | Pole | 20741 Locust Street | Willits |
| **42** | Pole | 25251 Sherwood Road | Willits |
| **43** | Pole | 25222 Sherwood Road | Willits |
| **44** | Pole | Corner of Sherwood Road and Primrose Drive | Willits |
| **45** | Pole | 1631 Primrose Drive | Willits |
| **46** | Pole | 32801 Albion Ridge Road | Albion |
| **47** | Pole | 32851 Albion Ridge Road | Albion |
| **48** | Pole | 32800 Albion Ridge Road | Albion |
| **49** | Pole | 33400 Frog Pond Road | Little River |
| **50** | Pole | Across from 33281 Frog Pond Creek | Little River |
| **51** | Pole | 33001 Dog Pond Road | Little River |
| **52** | Pole | 43020 Little Lake Road | Mendocino |
| **53** | Pole | 43020 Little Lake Road | Mendocino |
| **54** | Pole | One pole downstream from 43020 Little Lake Road | Mendocino |
| **55** | Pole | Across from 12700 Road 500D | Mendocino |
| **56** | Pole | 11501 Road 500D | Mendocino |
| **57** | Underground Pedestal | 14101 Hilma Circle | Mendocino |
| **58** | Pole | 4415 Johnson Park Road | Casper |
| **59** | Pole | 44200 Johnson Park Road | Casper |
| **60** | Pole | 44281 Johnson Park Road | Casper |
| **61** | Pole | 44311 Johnson Park Road | Casper |
| **62** | Pole | 16321 Old Casper Rail Road | Fort Bragg |
| **63** | Pole | 16331 Old Casper Rail Road | Fort Bragg |
| **64** | Pole | 16321 Old Casper Rail Road | Fort Bragg |
| **65** | Pole | 200 South Mcphearson Street | Fort Bragg |
| **66** | Pole | 207 South Harrison Street | Fort Bragg |
| **67** | Pole | 227 South Harrison Street | Fort Bragg |
| **68** | Pole | 204 Sutter Street | Petaluma |
| **69** | Pole | 1700 Pine Avenue | Petaluma |

| | | | |
|---|---|---|---|
| **70** | Pole | 1713 Pine Avenue | Petaluma |
| **71** | Pole | 1720 Pine Avenue | Petaluma |
| **72** | Pole | 1729 Pine Avenue | Petaluma |
| **73** | Pole | Intersection of Pepper Lane and Pepper Lane, one pole downstream from 97 Pepper Lane | Petaluma |
| **74** | Pole | 97 Pepper Lane | Petaluma |
| **75** | Pole | 105 Pepper Lane | Petaluma |
| **76** | Pole | 6115 Peterson Lane | Sebastopol |
| **77** | Pole | Across from 6115 Peterson Lane | Sebastopol |
| **78** | Pole | Between 6110 and 6105 Peterson Road | Sebastopol |
| **79** | Pole | Across the street from 3880 Graverstein Highway South | Sebastopol |
| **80** | Pole | 3906 Hessel Road | Sebastopol |
| **81** | Pole | 3932 Hessel Road | Sebastopol |
| **82** | Pole | 3944 Hessel Road | Sebastopol |
| **83** | Pole | 13878 Guerne Way at corner of Drake Road and Guerne Way | Guerneville |
| **84** | Pole | 13763 Guerne Way | Guerneville |
| **85** | Underground Vault | 202 Pool Creek Lane | Windsor |
| **86** | Underground Pull Box | 1000 Del Roble Lane | Windsor |
| **87** | Underground Vault | 1006 Del Roble Lane | Windsor |
| **88** | Underground Vault | 1024 Del Roble Lane | Windsor |
| **89** | Underground Pull Box | 1138 Portello Street | Windsor |
| **90** | Pole | 1622 Myrtle Street | Calistoga |
| **91** | Pole | 1610 Myrtle Street | Calistoga |
| **92** | Pole | 1207 Silver Street | Calistoga |
| **93** | Pole | 1207 Silver Street | Calistoga |
| **94** | Pole | 1387 Tucker Road | Calistoga |
| **95** | Pole | 1323 Tucker Road | Calistoga |
| **96** | Pole | 1320 Tucker Road | Calistoga |
| **97** | Pole | 390 Ridge Road | Novato |
| **98** | Pole | 402 Ridge Road | Novato |
| **99** | Pole | 406 Ridge Road | Novato |
| **100** | Pole | 406 Ridge Road | Novato |
| **101** | Pole | 410 Ridge Road | Novato |
| **102** | Underground Vault | 25 Hamilton Drive | Novato |
| **103** | Underground Vault | 15 Hamilton Drive | Novato |

| | | | |
|---|---|---|---|
| **104** | Underground Pedestal | 300 Bel Marin Keys Boulevard | Novato |
| **105** | Pole | 88 Happy Lane | San Rafael |
| **106** | Pole | Across from 45 Happy Lane | San Rafael |
| **107** | Pole | 31 Sirard Lane | San Rafael |
| **108** | Pole | 31 Sirard Lane | San Rafael |
| **109** | Pole | 19 Sirard Lane | San Rafael |
| **110** | Pole | 13 Sirard Lane | San Rafael |
| **111** | Pole | 122 Longfellow Road | Mill Valley |
| **112** | Pole | 101 Longfellow Road | Mill Valley |
| **113** | Pole | 160 Shelly Drive | Mill Valley |

## 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 related to the above rule are listed in Table 2:

**Table 2: GO 95, Rule 31.1 Findings**

| Location | Findings |
|---|---|
| **10** | The messenger feeding 6233 Montecito Boulevard is unattached to the pole and needs to be replaced. |
| **43** | The lashing wire is loose and has detached from the bug nut. |
| **49** | The vertical riser service drop is unattached to the pole and needs to be secured. |
| **84** | The pole transfer is incomplete, and the facilities are dangling unattached to the pole. |
| **91** | The pole transfer is incomplete, and the facilities are held up on the pole with a rope. |
| **94** | The vertical riser service drop feeding 1385 Tucker Road is loose and needs to be secured to the pole. |
| **97** | The vertical riser service drop is unattached to the pole and needs to be secured. |

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 related to the above rule are listed in Table 3:

**Table 3: GO 95, Rule 31.6 Findings**

| Location | Findings |
|---|---|
| **50** | The vertical ground wire is abandoned and needs to be removed. |
| **78** | The vertical ground wire is abandoned and needs to be removed. |
| **97** | The messenger between Location 97 and Location 98 is abandoned and needs to be removed. |
| **110** | The drop between Location 109 and Location 110 is abandoned and needs to be removed. |
| **113** | The drops hanging into the trees are abandoned and need to be removed. |

3. **GO 95, Rule 35, Vegetation Management s**tates 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 findings related to the above rule are listed in Table 4:

**Table 4: GO 95, Rule 35 Findings**

| Location | Findings |
|---|---|
| **11** | Vegetation is causing strain and abrasion on the conductors between Location 11 and Location 12. |
| **21** | Vegetation is causing strain and abrasion on the conductors and drops. |

| Location | Findings |
|---|---|
| **22** | Vegetation is starting to cause strain and abrasion on the conductors between Location 20 and Location 22. |
| **23** | Vegetation is causing strain and abrasion on the conductors between Location 22 and Location 23. |
| **25** | Vegetation is causing strain and abrasion on the drops and the vegetation is causing the drops to contact phones facilities. |
| **39** | Vegetation is causing strain and abrasion on the conductors. |
| **41** | Vegetation is causing strain and abrasion on the drops and a tree is deflecting the drops. |
| **56** | Vegetation is causing strain and abrasion on the drops and vegetation is wrapped around the pole. |
| **79** | Vegetation is causing strain and abrasion on the conductors between Location 79 and Location 80. |
| **81** | The service drop feeding 3932 Hessel Road is attached to a tree. |
| **84** | The service drop feeing 13763 Guerne Way is being deflected by a tree.<br>The conductor leading to the next pole from Location 84 is attached to a tree. |
| **90** | The service drop feeding 1622 Myrtle Street is attached to a tree. |
| **91** | Vegetation is causing strain and abrasion on the conductors between Location 91 and Location 92 and a tree is deflecting the service drop feeding 1613 Myrtle Street. |
| **92** | Vegetation is causing strain and abrasion on the conductors between Location 92 and Location 93. |
| **95** | Vegetation is causing strain and abrasion on the conductors between Location 94 and Location 95 and a tree is deflecting the conductors. |
| **96** | Vegetation is causing strain and abrasion on the conductors between Location 95 and Location 96. |
| **98** | A tree branch is deflecting the conductors between Location 97 and Location 98. |
| **99** | Vegetation is causing strain and abrasion on the conductors between Location 98 and Location 99. |
| **106** | Vegetation is causing strain and abrasion on the conductors between Location 105 and Location 106. |
| **108** | Vegetation is causing strain and abrasion on the conductors between Location 108 and Location 109.<br>A tree is deflecting the service drop feeding 29 Sirard Lane. |

4. **GO 95, Rule 38, Minimum Clearance of Wires from Other Wires** states in part:

*"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.*

*Table 2, Case 3C: The clearance between wires, cables and conductors not supported on the same poles, vertically at crossings in spans and radially where colinear or approaching crossings for communication conductors (including open wire, cables and service drops) must be at least 24 inches.*

*Table 2, Case 8C: Vertical separation between conductors and/or cables, on separate crossarms or other supports at different levels (excepting on related line and buck arms) on the same pole and in adjoining midspans for communication conductors (including open wire, cables and service drops) must be at least 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."*

ESRB's findings related to the above rule are listed in Table 5:

**Table 5: GO 95, Rule 38 Findings**

| Location | Findings |
|---|---|
| **17** | The service drop between Location 17 and Location 18 is hanging low and contacting the phone conductors. |
| **82** | The communication conductors between Location 81 and Location 82 are hanging low and do not have the required separation from the phone conductors. |
| **84** | The service drop feeding 13763 Guerne Way is hanging low in vegetation and is in contact with the phone conductors. |
| **92** | The communication conductors between Location 92 and Location 93 are hanging low and the attached amplifier is in contact with the phone conductors. |
| **96** | The communication conductors between Location 95 and Location 96 are hanging low and do not have the required separation from the phone conductors. |

5. **GO 95, Rule 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 related to the above rule are listed in Table 6:

**Table 6: GO 95, Rule 84.6-B Findings**

| Location | Findings |
|---|---|
| **20** | The vertical ground wire is exposed, and the protective moulding cover is damaged. |
| **22** | The vertical ground wire moulding cover is coming loose and needs to be reattached. |
| **53** | The vertical ground wire is exposed, and the protective moulding cover is missing. |
| **63** | The vertical ground wire is exposed, and the protective moulding cover is missing. |
| **67** | The vertical ground wire is exposed, and the protective moulding cover is missing. |
| **93** | The vertical ground wire is exposed, and the protective moulding cover needs to be replaced. |
| **97** | The vertical ground moulding does not reach the base of the pole and needs to be fully secured to the pole. |

6. **GO 95, Rule 84.8-C, Service Drops, Clearances above Ground and Buildings** states:

*"(1) Above Public Thoroughfares: Vertical clearance shall not be less than 18 feet.*

*EXCEPTION: Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line. In no case shall the clearance at the center*

*line be less than 18 feet. Where there are no curbs, the foregoing provisions shall apply using the outer limits of normal longitudinal vehicular movement in lieu of a curb line.*

*(2) Above Private Thoroughfares or Private property:*

*(a) Industrial and Commercial Premises: Over private driveways, lanes or property accessible to vehicles, service drops shall not be less than 16 feet.*

*(b) Residential Premises: Over residential driveways, lanes or over property accessible to vehicles, service drops shall not be less than 12 feet.*

*EXCEPTION: If the building served does not permit an attachment which will provide this 12 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible, but in no case less than 10 feet."*

ESRB's findings related to the above rule are listed in Table 7:

**Table 7: GO 95, Rule 84.8-C Findings**

| Location | Findings |
|---|---|
| **21** | The service drop feeding 1139 Standley Street is hanging low over a public street and needs to be reattached to the building. |
| **96** | The service drop feeding 1326 Tucker Road is hanging low over a private driveway and is currently held up by a wooden stake. |

7. **GO 95, Rule 86.2, Guys, Use** states in part:

*"Where mechanical loads imposed on poles, towers or structures are greater than can be supported with the safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.*

*Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire stress, the pole below the point of guy attachment acting merely as a strut.*

*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 related to the above rule are listed in Table 8:

**Table 8: GO 95, Rule 86.2 Findings**

| Location | Findings |
|---|---|
| **46** | The anchor down guy is slack. |
| **52?** | The communications down guy married to the phone down guy is attached to the power anchor and needs to be moved to attach to the phone anchor. |
| **62** | The down guy is disconnected from the anchor and needs to be reattached to the anchor. |
| **101** | The two anchor down guys are slack. |

8. **GO 95, Rule 86.4-C(4), Guys, Clearances, From Conductors, Passing on Same Poles** states:

   *"Where mechanical loads imposed on poles, towers or structures are greater than can be supported with the safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.*

   *The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall be not less than as specified in Table 2, Case 19 except that the clearance between guys and communication messenger and/or able attached directly to surface of pole may be less than the 3 inches specified in Table 2, Case 19, Column C provided: the guy is not a guy in proximity, or all parts of the guy are not less than 6 feet below 0 - 750 volt supply conductors supported on same pole, and a wood guard or equivalent is placed on the messenger and/or cable; also, a guy attached to a pole which supports supply conductors at a distance of not less than 6 feet above communication messenger and/or cable shall (1) have an insulator placed in the guy above the communication messenger and/or cable, at a distance of not less than 6 feet horizontally from the pole, or (2) have an insulator placed in the guy not less than 3 inches nor more than 6 inches above the messenger and/or cable, and a wood guard or equivalent placed on the messenger and/or cable."*

   ESRB's findings related to the above rule are listed in Table 9:

**Table 9: GO 95, Rule 86.4-C(4) Findings**

| Location | Findings |
|---|---|
| **83** | The down guy is contacting the phone conductor and does not have the required 3 inches of clearance. |

| Location | Findings |
|---|---|
| **92** | The service drop feeding 1601 Myrtle Street is connected to the down guy and does not have the required 3 inches of clearance. |

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

   *"In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule 86.7–B."*

   ESRB's findings related to the above rule are listed in Table 10:

**Table 10: GO 95, Rule 86.7-B Findings**

| Location | Findings |
|---|---|
| **21** | Vegetation above the down guy insulator is contacting and grounding the anchor guy. |
| **99** | Vegetation above the down guy insulator is contacting and grounding the anchor guy. |

10. **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 related to the above rule are listed in Table 11:

**Table 11: GO 95, Rule 87.7-D(1) Findings**

| Location | Findings |
|---|---|
| **26** | The riser guard is missing and exposing the communication drops. |
| **36** | The riser guard is missing and exposing the communication drops. |
| **37** | The riser guard is missing and exposing the communication drops. |
| **38** | The riser guard is missing and exposing the communication drops. |

**11. GO 95, Rule 92.4-C(2)(c), Ground Rods (Ground Electrodes)** states in part:

> *"Ground rods on the communication messenger system(s) shall conform to each of the following requirements.*
>
> *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 related to the above rule is listed in Table 12:

**Table 12: GO 95, Rule 92.4-C(2)(c) Finding**

| Location | Findings |
|---|---|
| **78** | The ground rod and vertical ground are exposed above ground. |

**12. 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 findings related to the above rule are listed in Table 13:

**Table 13: GO 128, Rule 17.1 Findings**

| Location | Findings |
|---|---|
| **3** | The amplifier is not within an enclosure and is exposed to the public. |
| **8** | The pedestal has a broken lock and is easily accessible by the public. |
| **9** | The pedestal is missing a lock and is easily accessible by the public. |
| **103** | The vault has Sonic mule tape within Comcast's equipment that implies future Sonic service within the Comcast box. |

## V. Observations

1. **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 18-A, 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 GO 95."*

   During the field inspection, ESRB noted the third-party safety concerns listed in Table 14. While in the field, Comcast created and sent third-party notifications to the respective utilities for the items below:

**Table 14: Third-Party Observations**

| Location | Observations |
|---|---|
| **11** | Phone has a loose lashing wire. |
| **15** | Phone has a loose guy wire. |
| **16** | Phone has a cracked pole. |
| **17** | Phone has an abandoned drop. |
| **21** | Power has a low drop and excessive vegetation that requires trimming. |
| **22** | Phone has excessive vegetation that requires trimming. |

| Location | Observations |
|---|---|
| **23** | Phone has abandoned drops. |
| **24** | Phone has a tree causing strain and abrasion on a drop that requires trimming.<br>Power has vegetation above the down guy insulator bob. |
| **25** | Power has vegetation strain and abrasion on the drops that requires trimming. |
| **27** | Power has a drop wrapped around a tree. |
| **37** | Phone has a low hanging drop. |
| **38** | Phone has an exposed drop with a missing a riser guard. |
| **40** | Phone has an abandoned drop. |
| **44** | Phone has a loose down guy with attached vegetation and a missing guy insulator bob. |
| **45** | Phone has a loose down guy with a missing guy insulator bob.<br>Power has a loose down guy. |
| **46** | Power has a loose down guy. |
| **48** | Phone has an exposed drop with a missing riser guard. |
| **49** | Phone has an abandoned drop and line hanging down. |
| **54** | Phone has an exposed grounding wire with missing riser guard and an unsecured vertical drop. |
| **58** | Phone has three loose down guys. |
| **61** | Phone has a broken lashing wire and excessive vegetation that requires trimming. |
| **67** | Phone has an abandoned drop. |
| **70** | Phone has an incomplete pole transfer. |
| **80** | Phone has two abandoned drops. |
| **82** | Phone has an exposed ground wire with missing riser guard.<br>Power has a broken span guy. |
| **91** | Power has excessive vegetation contacting the primary lines. |
| **94** | Phone has an exposed ground wire with missing riser guard.<br>Power has an abandoned pole that needs to be removed. |
| **95** | Phone has vegetation above the down guy insulator bob.<br>Power has an abandoned pole that needs to be removed. |
| **96** | Power has an abandoned pole that needs to be removed. |

| Location | Observations |
|---|---|
| **97** | Power has vegetation above the down guy insulator bob. |
| **98** | Phone has a drop contacting the down guy. |
| **99** | Power has vegetation above the down guy insulator bob. |
| **101** | Phone has a missing down guy. |
| **105** | Power has excessive vegetation contacting the primary lines. |
| **106** | Phone has a drop tied up in a tree with excessive vegetation.<br>Power has excessive vegetation contacting the primary lines. |
| **109** | Phone has an abandoned cut down guy. |
| **110** | Phone has an abandoned drop. |
| **111** | Phone has low hanging drops attached to Comcast's drops.<br>Power has vegetation above the down guy insulator bob. |
| **113** | Phone has vegetation above the down guy insulator bob.<br>Power has vegetation above the down guy insulator bob. |