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

November 15, 2023 CA2023-1028

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

SUBJECT: Audit of T-Mobile North 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 Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of T-Mobile's North Los Angeles County Region from September 18, 2023 to September 22, 2023. 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 December 15, 2023 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
Norvik Ohanian, 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	436865M	Pole	Shadow Hills
2	436866M	Pole	Shadow Hills
3	436867M	Pole	Shadow Hills
4	436868M	Pole	Shadow Hills
5	436869M	Pole	Shadow Hills
6	436870M	Pole	Shadow Hills
7	436871M	Pole	Shadow Hills
8	436872M	Pole	Shadow Hills
9	525392M	Pole	Shadow Hills
10	525391M	Pole	Shadow Hills
11	1413S	Pole	Shadow Hills
12	72932M	Pole	Shadow Hills
13	72931M	Pole	Shadow Hills
14	9065M	Pole	Shadow Hills
15	444754M	Pole	Shadow Hills
16	444755M	Pole	Shadow Hills
17	GT69835	Pole	Shadow Hills
18	444756M	Pole	Shadow Hills
19	257143	Pole	Shadow Hills
20	444757M	Pole	Shadow Hills
21	GT257145	Pole	Shadow Hills
22	444758M	Pole	Shadow Hills
23	445314M	Pole	Shadow Hills
24	445315M	Pole	Shadow Hills
25	445316M	Pole	Shadow Hills
26	445317M	Pole	Shadow Hills
27	445318M	Cellular Site	Shadow Hills
28	SV12157B	Pole	Arleta
29	SV12157B	Pedestal	Arleta
30	SV00587C	Vault	Arleta
31	GT136827	Cellular Site	North Hills
32	SV13618A	Pedestal	North Hills
33	SV12009B	Cellular Site	North Hills
34	SV12009B	Pedestal	North Hills
35	SV12009B	Vault	North Hills

No.	Structure Number	Type of Structure	City
36	SV01978	Vault	North Hills
37	SV01978C	Pedestal	North Hills
38	412820M	Cellular Site	North Hills
39	107089M	Cellular Site	Northridge
40	10055PBM	Pole	Northridge
41	SV12178A	Pedestal	Granada Hills
42	SV12178A	Cellular Site	Granada Hills
43	SV12178A	Vault	Granada Hills
44	SV01594D	Pedestal	Granada Hills
45	SV01594D	Cellular Site	Granada Hills
46	39PBM	Pole	Los Angeles
47	38PBM	Pole	Los Angeles
48	10005PBM	Pole	Los Angeles
49	00036PBM	Pole	Los Angeles
50	00035PBM	Pole	Los Angeles
51	00034PBM	Pole	Los Angeles
52	00033PBM	Cellular Site	Los Angeles
53	00032PBM	Pole	Los Angeles
54	382199M	Pole	Los Angeles
55	382198M	Pole	Los Angeles
56	One Pole East of 382198M	Pole	Los Angeles
57	382200M	Pole	Los Angeles
58	8401-1/2 Mulholland Dr	Pole	Los Angeles
59	382202M	Pole	Los Angeles
60	10063PBM	Pole	Los Angeles
61	372273M	Pole	Los Angeles
62	107572M	Cellular Site	Beverly Hills
63	305185M	Pole	Tarzana
64	100247NG	Pole	Calabasas
65	350357M	Pole	Woodland Hills
66	10062PBM	Pole	Woodland Hills
67	SV-00868C	Vault	Porter Ranch
68	SV-00868C	Pedestal	Porter Ranch
69	SV-00868C	Pole	Porter Ranch
70	10020PBM	Cellular Site	Northridge
71	10128PBM	Cellular Site	Northridge
72	SV11580B	Vault	Northridge
73	SV11580	Pedestal	Northridge
74	SV11899A	Radio Base Station (RBS) Cabinet	Chatsworth

No.	Structure Number	Type of Structure	City
75	SV11899A	Pedestal	Chatsworth
76	10178PBM	Pole	Chatsworth
77	SV00840	Cellular Site	West Hills
78	SV00840C	Pedestal	West Hills
79	SV00840	Vault	West Hills
80	SV11440D	Cellular Site	Winnetka
81	SV11440D	Pedestal	Winnetka
82	10279PBM	Cellular Site	Tarzana
83	SV01510	Pedestal	Tarzana

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:

- 107089M –A bird's nest was found inside the bottom shroud located under the radio equipment.
- 38PBM – A T-Mobile lashing wire was broken.
- 350357M – The lock for the disconnect switch box was missing.
- 10020PBM – The cover for the RET (remote electrical tilt) box was missing.
- 10128PBM – The "Notice" sign for radio frequency was not properly attached to the 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.*

T-Mobile ground wire attached to pole SV12157B was cut and permanently abandoned, but not removed.

GO 95, Rule 34, Foreign Attachments, states in part:

> *Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

An unauthorized "Brush Area" sign was attached on pole 382200M.

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 pole 372273M was not taut.

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 each of the following poles had less than 12 inches of vertical separation:

- Pole 436868M – T-Mobile's conductor was in contact with another communication conductor.
- Pole 436872M – T-Mobile's conductor was in contact with another communication conductor.
- Pole East of 382198M – T-Mobile's conductor was in contact with another communication conductor.
- Pole 10063PBM – T-Mobile's conductor was in contact with another communication conductor at mid-span.

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 each of the following poles was damaged:

- 39PBM
- 10062PBM
- SV11440D

The ground wire of pole 10279PBM lacked a suitable covering at ground level.

GO 95, Rule 84.7-A, Climbing Space, states in part:

> *Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1* and *87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.*

The climbing space on pole 107572M was obstructed by another communication service drop.

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.*

The outer most down guy wire attached to pole 372273M did not have a guy marker.

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.*

T-Mobile facilities at the following sites required maintenance:

- Site ID SV00868C – The AC unit located inside the vault was emitting white dust (residue) onto the transport device equipment.
- Site ID SV11440D – The lock securing the pedestal door was missing and the latch was broken.