

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 21, 2012

CA2012-005

Ross Johnson
Area Manager Regulatory Relations
AT&T California
525 Market Street, 19th Floor, # 33
San Francisco, CA 95105

SUBJECT: Audit of AT&T California's Bay Region

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Paul Penney and Ryan Yamamoto conducted an audit of AT&T California's (AT&T) Bay Region in Alameda County on April 3-5, 2012. The audit included a review of AT&T's maintenance records and inspections of AT&T's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than June 22, 2012, by electronic or hard copy, of all corrective measures taken by AT&T California to remedy and prevent such violations.

If you have any questions concerning this audit you can contact, Ryan Yamamoto of my staff at (415) 703-2192 or ryan.yamamoto@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stepanian", with a long horizontal line extending to the right.

Raffy Stepanian, P.E.
Program Manager
Electric Safety and Reliability Branch
Consumer Protection and Safety Division
California Public Utilities Commission

Enclosures: CPUC Audit Summary

CC: Raymond Fugere, Program and Project Supervisor, CPUC
Alok Kumar, Senior Utilities Engineer (Supervisor), CPUC
Paul Penney, Utilities Engineer, CPUC
Ryan Yamamoto, Utilities Engineer, CPUC

Audit Summary

Company: AT&T California – Bay Region
Communication Infrastructure Provider Audit
Date: April 3-5, 2012

Programmatic Violations

GO 95, Rule 18-A1b, states:

(b) *Upon completion of the corrective action, the company's records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years and shall be made available to Commission staff upon 30 days notice.*

...

(ii) *Level 2:*

- *Variable (non-immediate high to low) safety and/or reliability risk.*
- *Take action to correct within specified time period (fully repair, or by temporarily repairing and reclassifying the condition to a lower priority).*

Time period for correction to be determined at the time of identification by a qualified company representative, but not to exceed: (1) 12 months for nonconformances that compromise worker safety, (2) 12 months for nonconformances that create a fire risk and are located in an Extreme or Very High Fire Threat Zone in Southern California, and (3) 59 months for all other Level 2 nonconformances.

AT&T's maintenance plan does not address Level 2 correction items that must be corrected within 12 months.

GO 95, Rule 80.1-A2, Statewide Inspection Requirements, states:

"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."

AT&T did not have procedures for conducting patrols or details inspections for all its overhead communication lines throughout the state.

GO 128 Rule 17.2, Inspection of Lines, 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.”

AT&T had an inspection program focused primarily on facilities that it considered problematic. AT&T’s focus on inspecting problem areas does not constitute a “thorough” inspection program per GO 128.

Field Violations

1.	Location:	744 Airway Blvd, Livermore, CA
	Previous AT&T Visit Details:	08/10/11
	Date of CPUC Inspection:	04/04/12
	Explanation of Violation(s):	
	<p><u>Inadequate Pole Loading Calculations</u> GO 95, Rule 44.2, Additional Construction, States:</p> <p align="center"><i>“Any entity planning the addition of facilities that materially increase vertical, transverse or longitudinal loading on a structure shall perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors below the values specified by Rule 44.3. Such entity shall maintain these pole loading calculations for ten years and shall provide such information to authorized joint use pole occupants and the Commission upon request.”</i></p> <p>AT&T’s pole load calculation did not contain accurate information; specifically, the data used in the calculation did not accurately reflect the facilities in the field. Pole loading calculations need to use accurate information.</p>	

2.	Location:	2700 Robertson Park, Livermore, CA
	Previous AT&T Visit Details:	05/06/2011
	Date of CPUC Inspection:	04/04/2012
Explanation of Violation(s):		
<p><u>Inadequate Pole Loading Calculations</u> GO 95, Rule 44.2, Additional Construction, States:</p> <p><i>“Any entity planning the addition of facilities that materially increase vertical, transverse or longitudinal loading on a structure shall perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors below the values specified by Rule 44.3. Such entity shall maintain these pole loading calculations for ten years and shall provide such information to authorized joint use pole occupants and the Commission upon request.”</i></p> <p>AT&T’s pole load calculation did not contain accurate information; specifically, the data used in the calculation did not accurately reflect the facilities in the field. Pole loading calculations need to use accurate information.</p>		

3.	Location:	611 McLeod Street, Livermore, CA
	Previous AT&T Visit Details:	03/06/2012
	Date of CPUC Inspection:	04/04/2012
Explanation of Violation(s):		
<p><u>Strain on Service Drops</u> GO 95 Rule 35, Vegetation Management, states in part:</p> <p><i>“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). ... 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.”</i></p> <p>At this location, a tree branch was causing strain on AT&T’s telephone drops. This violation was not documented when AT&T last visited the pole.</p> <p><u>Unsecured Vertical Service</u> GO 95 Rule 84.6-F, Protective Covering, states in part:</p> <p><i>“Protective covering shall be attached to poles, crossarms and structures by means of corrosion-resistant straps, lags or staples which are adequate to maintain such covering in a fixed position.”</i></p> <p>At this location, a pole on this span where services running vertically up was not securely attached. This violation was not documented when AT&T last visited the pole.</p>		

4.	Location:	623 Maple Street, Livermore, CA
	Previous AT&T Visit Details:	03/05/2012
	Date of CPUC Inspection:	04/04/2012
Explanation of Violation(s):		
<u>Missing Guy Markers</u>		
GO 95 Rule 86.9, Guy Marker (Guy Guard), states:		
<p><i>“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.”</i></p>		
At this location, AT&T’s anchor guy was missing a guy guard. This violation was not documented when AT&T last visited the pole.		

5.	Location:	645 S. Livermore Avenue, Livermore, CA
	Previous AT&T Visit Details:	03/30/2012
	Date of CPUC Inspection:	04/04/2012
Explanation of Violation(s):		
<u>Low Service Drop</u>		
GO 95 Rule 84.8-C1, Clearances Above Public Thoroughfares, states:		
<p><i>“Vertical clearance shall not be less than 18 feet.</i></p>		
<p><i>“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.”</i></p>		
At this location, the service drop vertical clearance was measure at 14 feet and 2 inches at the curb. This violation was not documented when AT&T last visited the pole.		

6.	Location:	3792 Oregon Way, Livermore, CA
	Previous AT&T Visit Details:	03/10/2012
	Date of CPUC Inspection:	04/04/2012
Explanation of Violation(s):		
<p><u>AT&T and CATV Service Drops Touching</u> GO 95 Rule 38, Table 2:</p> <p><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2.</i></p> <p>At this location, AT&T and CATV service drops were touching. This violation was not documented when AT&T last visited the pole.</p>		

7.	Location:	3960 Stanford Way, Livermore, CA
	Previous AT&T Visit Details:	03/05/2012
	Date of CPUC Inspection:	04/04/2012
Explanation of Violation(s):		
<p><u>Low Service Drop</u> GO 95 Rule 84.8-C1, Clearances Above Public Thoroughfares, states:</p> <p><i>“Vertical clearance shall not be less than 18 feet.</i></p> <p><i>“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.”</i></p> <p>At this location, the service drop vertical clearance was measure at 13 feet and 7 inches at the curb. This violation was not documented when AT&T last visited the pole.</p>		

8.	Location:	7294 Brighton Drive, Dublin, CA
	Previous AT&T Visit Details:	N/A (3 rd Party Notice from PG&E)
	Date of CPUC Inspection:	04/05/2012
	Explanation of Violation(s):	
	<p><u>Missing Guy Markers</u> GO 95 Rule 86.9, Guy Marker (Guy Guard), states:</p> <p><i>“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.”</i></p> <p>At this location, two (2) AT&T anchor guys were missing guy guards. These violations were brought to AT&T’s attention by PG&E and have not been remediated.</p>	

9.	Location:	8079 Aldea Street, Dublin, CA
	Previous AT&T Visit Details:	N/A (3 rd Party Notice from PG&E)
	Date of CPUC Inspection:	04/05/2012
Explanation of Violation(s):		
<p><u>Low Service Drop</u> GO 95 Rule 84.8 C3b, Above Ground in Areas Accessible to Pedestrians Only - Residential Premises, states:</p> <p><i>“Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet.</i></p> <p><i>“EXCEPTION: If the building served does not permit an attachment which will provide this 10 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 8 feet 6 inches.”</i></p> <p>At this location, the service drop vertical clearance was measure at 7 feet and 11 inches on the residential premises. This violation was brought to AT&T’s attention by PG&E and had not been remediated.</p> <p><u>Abandon Service Drops</u> GO 95, Rule 31.6, Abandoned Lines, states</p> <p><i>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.</i></p> <p>At this location, the services drops seemed to be abandoned. This violation was brought to AT&T’s attention by PG&E and had not been remediated.</p>		

10.	Location:	7563 Landale Avenue, Dublin, CA
	Previous AT&T Visit Details:	N/A (3 rd Party Notice from PG&E)
	Date of CPUC Inspection:	04/05/2012
	Explanation of Violation(s):	
	<p><u>Strain on Service Drops</u> GO 95 Rule 35, Vegetation Management, states in part:</p> <p><i>“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 ... 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).”</i></p> <p>At this location, a tree branch was causing strain on AT&T’s telephone drops. This violation was brought to AT&T’s attention by PG&E and had not been remediated.</p>	

