

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



August 7, 2012

Lorraine A. Kocen
State Government Affairs
Verizon California, Inc.
2535 W. Hillcrest Drive
Newbury Park, California 91320

CA2012-006

SUBJECT: Audit of Verizon's Los Angeles County Region

Dear Ms. Kocen:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong and Koko Tomassian of my staff conducted an audit of Verizon's Los Angeles County Region from April 23, 2012 to April 27, 2012. The audit included a review of Verizon's records and field inspections of Verizon's facilities.

During the audit, my staff 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 September 11, 2012, by electronic or hard copy, of all corrective measures taken by Verizon to remedy and prevent such violations.

If you have any questions, you can contact Derek Fong at (213) 576-6850 or Derek.Fong@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

Enclosure: Audit Summary

CC: Raymond Fugere, Program and Project Supervisor, CPUC

AUDIT SUMMARY

1.	Location:	Verizon – Los Angeles County
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<p><u>Inspections not Frequent and Thorough</u></p> <p>GO 95, Rule 80.1-A2, Statewide Inspection Requirements, states in part :</p> <p style="padding-left: 40px;"><i>“Each company shall prepare, follow ... procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based...”</i></p> <p>GO 128, Rule 12.2, Maintenance, states in part :</p> <p style="padding-left: 40px;"><i>“Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.”</i></p> <p>GO 128, Rule 17.2, Inspection, states in part :</p> <p style="padding-left: 40px;"><i>“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.”</i></p> <p>Verizon does not frequently and thoroughly inspect its facilities and document all GOs 95 and 128 violations, and does not perform inspections that encompass all of the overhead and underground lines. The frequency of inspections must be determined by Verizon at a level adequate enough to ensure that your facilities are in good condition and in compliance with GOs 95 and 128. Verizon’s current inspection program does not meet the requirements of GO 95, Rule 80.1-A2 and GO 128, Rules 12.2 and 17.2.</p>		

2.	Location:	Pole No. XPI36-037
	Previous Verizon Visit Details:	Previous inspection date not found
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<u>Ground Wire in the Climbing Space</u>		
GO 95, Rule 84.7, Climbing and Working Space, states in part:		
<i>“Climbing space shall be provided on one side or quadrant on all poles or structures supporting communication conductors ...”</i>		
A Verizon ground wire was wrapped across the climbing space. This violation was not documented when Verizon last visited the pole.		

3.	Location:	Pole No. 1308887E
	Previous Verizon Visit Details:	11/28/2011
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<u>Third Party CIP – Broken Lashing Wire</u>		
GO 95, Rule 18-B, Notification of Safety Hazards, states in part:		
<i>“If a company ... 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.”</i>		
The pole supported a broken third-party lashing wire. Verizon did not notify the third party of this safety hazard when it last visited the pole.		

4.	Location:	Pole No. 1750572E
	Previous Verizon Visit Details:	04/12/2011
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<u>Abandoned Verizon Service Drop</u>		
<p>GO 95, Rule 31.6, Abandoned Lines, states in part :</p> <p style="text-align: center;"><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.”</i></p> <p>The pole supported a Verizon service drop that was abandoned. This violation was not documented when Verizon last visited the pole.</p>		

5.	Location:	Pole No. 403384M
	Previous Verizon Visit Details:	08/26/2011
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<u>Third-party Power Amplifier in the Climbing Space</u>		
<p>GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, states in part:</p> <p style="text-align: center;"><i>“Where a communications company’s or an electric utility’ actions result in GO nonconformances for another entity, that entity’s remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.”</i></p> <p>A third-party CIP power amplifier was obstructing in the climbing space. Verizon did not notify the third party of this GO nonconformance when it last visited the pole.</p>		

6.	Location:	Pole No. 85061M
	Previous Verizon Visit Details:	12/23/2011
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<u>Abandoned Verizon Service Drop</u>		
GO 95, Rule 31.6, Abandoned Lines, states in part :		
<p style="text-align: center;"><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.”</i></p>		
The pole supported an abandoned Verizon service drop. This violation was not documented when Verizon last visited the pole.		

7.	Location:	Pole No. 24325Y
	Previous Verizon Visit Details:	04/14/2011
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<u>Low Pole Step</u>		
GO 95, Rule 81.6, Stepping, states in part :		
<p style="text-align: center;"><i>“The lowest step on any stepped pole shall be not less than 7 feet 6 inches from the ground line where supply conductors are supported on the same pole with communication conductors.”</i></p>		
A pole step was 6 feet 6 inches from the ground line. This violation was not documented when Verizon last visited the pole.		

8.	Location:	Pole No. 28845Y
	Previous Verizon Visit Details:	04/14/2011
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<u>Verizon Service Drops Attached to a Third-Party Cable</u>		
<p>GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p style="text-align: center;"><i>“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. ...</i></p> <p style="text-align: center;"><i>“The clearances in Table 2 shall in no case be reduced more than 10 percent because of temperature and loading as specified in Rule 43 ...”</i></p> <p>Table 2, Case 8, Column C, requires a 12 inch separation between different communications conductors. Four Verizon service drops were attached to a third-party cable span. This violation was not documented when Verizon last visited the pole.</p>		

9.	Location:	Pole No. 27663Y
	Previous Verizon Visit Details:	04/14/2011
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<u>Damaged Conduit Cover</u>		
<p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p style="text-align: center;"><i>“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.”</i></p> <p>A Verizon conduit cover was damaged. This violation was not documented when Verizon last visited the pole.</p>		

10.	Location:	MH164
	Previous Verizon Visit Details:	Previous inspection date not found
	Date of CPUC Inspection:	04/23/2012
Explanation of Violation(s):		
<p data-bbox="204 575 719 611"><u>Verizon Cable Bundle Not Racked</u></p> <p data-bbox="204 648 1248 684">GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="339 722 1482 867"><i>“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.”</i></p> <p data-bbox="204 905 1398 940">A Verizon cable bundle inside a manhole was not supported on top of existing racks.</p>		