

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 12, 2013

CA2013-007

Ross Johnson  
Associate Director – Regulatory  
AT&T California  
525 Market Street, 19<sup>th</sup> Floor, #33  
San Francisco, CA 94105

**SUBJECT:** Audit of AT&T – Imperial County

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Koko Tomassian of my staff conducted an electric audit of AT&T– Imperial County from June 10, 2013 to June 13, 2013. The audit included a review of AT&T's records and field 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, a list area of concerns and additional question is enclosed. Please advise me no later than December 2, 2013 by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

If you have any questions concerning this audit please contact, Koko Tomassian at (213) 576-7099 or [koko.tomassian@cpuc.ca.gov](mailto:koko.tomassian@cpuc.ca.gov).

Sincerely,

Raymond Fugere, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Audit Summary

CC: Koko Tomassian, Utilities Engineer, CPUC  
Fadi Daye, Senior Utilities Engineer Supervisor, CPUC  
Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division

## AUDIT SUMMARY

<b>1.</b>	<b>Structure No.:</b>	1189235
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<p><b><u>Missing Guy Marker – 3<sup>rd</sup> Party</u></b>            GO 95, Rule 56.9, Guy Marker (Guy Guard), states in part:</p> <p style="text-align: center;"><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.</i></p> <p>GO 95, Rule 18-B, Notification of Safety Hazards, States:</p> <p style="text-align: center;"><i>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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.</i></p> <p>The anchor belonging to the electric utility did not have a marker. AT&amp;T did not notify the electric utility of this safety hazard when it last inspected the pole.</p>		

2.	<b>Structure No.:</b>	1053883H
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<b><u>Broken Lashing Wire</u></b>		
<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>The pole had a broken and unsecured lashing wire. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p>		

3.	<b>Structure No.:</b>	1189230
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<b><u>Abandoned Lashing Wire</u></b>		
<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 had a broken lashing wire that was hanging down from the pole. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p>		

4.	<b>Structure No.:</b>	1053898H
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<p><b><u>Abandoned Lashing Wire</u></b>  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 had a broken lashing wire that was hanging down from the pole. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p>		

5.	<b>Structure No.:</b>	827903H
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<p data-bbox="186 562 633 594"><b><u>Missing Guy Marker – 3<sup>rd</sup> Party</u></b></p> <p data-bbox="186 600 941 632">GO 95, Rule 56.9, Guy Marker (Guy Guard), states in part:</p> <p data-bbox="321 678 1328 783"><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.</i></p> <p data-bbox="186 829 925 861">GO 95, Rule 18-B, Notification of Safety Hazards, States:</p> <p data-bbox="321 907 1351 1085"><i>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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.</i></p> <p data-bbox="186 1131 1453 1192">The anchor belonging to the electric utility did not have a marker. AT&amp;T did not notify the electric utility of this safety hazard when it last inspected the pole.</p>		

6.	<b>Structure No.:</b>	7106
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<p><b><u>Abandoned Lashing Wire</u></b>  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 had a broken lashing wire that was hanging down from the pole. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p>		

<b>7.</b>	<b>Structure No.:</b>	7103
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<b><u>Communication Cables not Marked</u></b>		
<p>GO 95, Rule 91.5, Marking, states in part:</p> <p style="text-align: center;"><i>Each communication cable and conductor as defined by Rules 20.4, 20.6(A), 20.9, 84.1, 87.4(C), and 89.1 that is attached to a joint-use pole shall be marked as to ownership... This marking requirement applies only to (A) new construction, (B) reconstruction of facilities, and (C) existing aerial communication cables and conductors that a technician works on when the technician ascends the joint-use pole for regular maintenance.</i></p> <p>The AT&amp;T cables attached to this pole were not marked, although AT&amp;T crews had recently performed work on this pole.</p>		

<b>8.</b>	<b>Structure No.:</b>	730790H
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
<p>GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p style="text-align: center;"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p>The vertical clearance between an AT&amp;T cable and other communication cables of different ownership was less than 12 inches at midspan. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p>		

9.	<b>Structure No.:</b>	730793H
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<p data-bbox="204 562 1284 594"><b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b></p> <p data-bbox="204 636 824 667">GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p data-bbox="337 709 1354 814"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p data-bbox="204 863 1414 968">The vertical clearance between an AT&amp;T cable and other communication cables of different ownership was less than 12 inches at midspan. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p> <p data-bbox="204 1010 695 1041"><b><u>Communication Cables not Marked</u></b></p> <p data-bbox="204 1087 743 1119">GO 95, Rule 91.5, Marking, states in part:</p> <p data-bbox="337 1161 1365 1381"><i>Each communication cable and conductor as defined by Rules 20.4, 20.6(A), 20.9, 84.1, 87.4(C), and 89.1 that is attached to a joint-use pole shall be marked as to ownership... This marking requirement applies only to (A) new construction, (B) reconstruction of facilities, and (C) existing aerial communication cables and conductors that a technician works on when the technician ascends the joint-use pole for regular maintenance.</i></p> <p data-bbox="204 1423 1390 1493">The AT&amp;T cables attached to this pole were not marked, although AT&amp;T crews had recently performed work on this pole.</p>		



10.	<b>Structure No.:</b>	730794H
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<p data-bbox="204 562 1284 596"><b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b></p> <p data-bbox="204 636 824 669">GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p data-bbox="337 711 1354 821"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p data-bbox="204 863 1414 966">The vertical clearance between an AT&amp;T cable and other communication cables of different ownership was less than 12 inches at midspan. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p>		

11.	<b>Structure No.:</b>	730795H
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<p data-bbox="204 562 1284 596"><b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b></p> <p data-bbox="204 636 824 669">GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p data-bbox="337 711 1354 819"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p data-bbox="204 863 1414 970">The vertical clearance between an AT&amp;T cable and other communication cables of different ownership was less than 12 inches at midspan. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p> <p data-bbox="204 1014 695 1047"><b><u>Communication Cables not Marked</u></b></p> <p data-bbox="204 1089 743 1123">GO 95, Rule 91.5, Marking, states in part:</p> <p data-bbox="337 1165 1365 1381"><i>Each communication cable and conductor as defined by Rules 20.4, 20.6(A), 20.9, 84.1, 87.4(C), and 89.1 that is attached to a joint-use pole shall be marked as to ownership... This marking requirement applies only to (A) new construction, (B) reconstruction of facilities, and (C) existing aerial communication cables and conductors that a technician works on when the technician ascends the joint-use pole for regular maintenance.</i></p> <p data-bbox="204 1425 1390 1495">The AT&amp;T cables attached to this pole were not marked, although AT&amp;T crews had recently performed work on this pole.</p>		

<b>12.</b>	<b>Structure No.:</b>	1201212
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b>		
<p>GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p style="text-align: center;"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p>The vertical clearance between an AT&amp;T cable and other communication cables of different ownership was less than 12 inches at midspan. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p>		

<b>13.</b>	<b>Structure No.:</b>	8631591
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<b><u>Communication Cables not Marked</u></b>		
<p>GO 95, Rule 91.5, Marking, states in part:</p> <p style="text-align: center;"><i>Each communication cable and conductor as defined by Rules 20.4, 20.6(A), 20.9, 84.1, 87.4(C), and 89.1 that is attached to a joint-use pole shall be marked as to ownership... This marking requirement applies only to (A) new construction, (B) reconstruction of facilities, and (C) existing aerial communication cables and conductors that a technician works on when the technician ascends the joint-use pole for regular maintenance.</i></p> <p>The AT&amp;T cables attached to this pole were not marked, although AT&amp;T crews had recently performed work on this pole.</p>		

14.	<b>Structure No.:</b>	P6386T
	<b>Previous AT&amp;T Visit Details:</b>	Patrol Inspection, December 2012
	<b>Date of CPUC Inspection:</b>	June 12, 2013
<b>Explanation of Violation(s):</b>		
<p data-bbox="204 562 1284 594"><b><u>Insufficient Clearance Between Communication Cables of Different Ownership</u></b></p> <p data-bbox="204 636 824 667">GO 95, Rule 38, Table 2, Case 8C, requires that:</p> <p data-bbox="337 709 1354 814"><i>Conductors and/or cables, on separate crossarms or other supports at different levels on the same pole must maintain a 12 inch vertical separation from communication conductors.</i></p> <p data-bbox="204 863 1414 968">The vertical clearance between an AT&amp;T cable and other communication cables of different ownership was less than 12 inches at midspan. This violation was not noted or addressed when AT&amp;T last inspected the pole.</p> <p data-bbox="204 1010 695 1041"><b><u>Communication Cables not Marked</u></b></p> <p data-bbox="204 1087 743 1119">GO 95, Rule 91.5, Marking, states in part:</p> <p data-bbox="337 1161 1365 1381"><i>Each communication cable and conductor as defined by Rules 20.4, 20.6(A), 20.9, 84.1, 87.4(C), and 89.1 that is attached to a joint-use pole shall be marked as to ownership... This marking requirement applies only to (A) new construction, (B) reconstruction of facilities, and (C) existing aerial communication cables and conductors that a technician works on when the technician ascends the joint-use pole for regular maintenance.</i></p> <p data-bbox="204 1423 1390 1495">The AT&amp;T cables attached to this pole were not marked, although AT&amp;T crews had recently performed work on this pole.</p>		