

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 21, 2014

CA2013-013

John A. Gutierrez
Director, Government Affairs
Comcast
3055 Comcast Place
Livermore, CA 94551

SUBJECT: Audit of Comcast, San Joaquin County

Dear Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ivan Garcia, and Jamie Lau of my staff conducted a Communication Infrastructure Provider (CIP) audit of Comcast, San Joaquin County from November 18 to 20, 2013. The audit included a review of Comcast's records and field inspections of Comcast'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 April 30, 2014 by electronic or hard copy, of all corrective measures taken by Comcast to remedy and prevent such violations.

If you have any questions concerning this audit please contact, Ivan Garcia at (916) 928-5875 or ivan.garcia@cpuc.ca.gov

Sincerely,

A handwritten signature in dark ink, appearing to read "Raymond Fugere".

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

Enclosure: Audit Summary

CC: Alok Kumar, Senior Utilities Engineer, Supervisor, CPUC
Ivan Garcia, Utilities Engineer, CPUC
Jamie Lau, Utilities Engineer, CPUC
Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division

AUDIT SUMMARY

Company: Comcast – San Joaquin County

CIP Audit

Date: November 18 to November 20, 2013

Violations

The following are violations that ESRB engineers discovered during the field audit and were not documented and addressed by Comcast during its last site visit.

A.	Location:	4212 N. Pershing Ave, Suite A6, Stockton
	Facility:	Overhead Service Drop
	Previous Visit by Utility:	Job #529207 9/26/13
	Date Visited by CPUC:	11/11/13
Explanation of Violation(s):		
<p><u>Service Drop Blocking Public Access and Contact With Metallic Object</u></p> <p>GO 95, Rule 84.8-C4(d), Clearances From Buildings and Structures, states in part:</p> <p style="text-align: center;"><i>“Service drops are not required to clear buildings any specified horizontal distance but shall be so installed that they do not interfere with the free use of fire escapes, windows, doors and other points at which entrance or exit might be expected.”</i></p> <p>Comcast identified and corrected a broken lashing wire at this location on September 26, 2013 as stated in Job #529207.</p> <p>However, on November 11, 2013, we found two overhead service drops hindering access to a building roof ladder. This condition was not documented during the completion of Job #52907. According to Comcast’s <i>G.O. 95/128 & System Maintenance Day to Day Business Plan</i>, the violation should have been captured for repair on September 26, 2013.</p>		

B.	Location:	114 and 110 S. Los Angeles Street, Stockton
	Facility:	Overhead Service Drop
	Previous Visit by Utility:	8/2013
	Date Visited by CPUC:	11/19/2013
Explanation of Violation(s):		
<p><u>Insufficient Vertical Clearance</u></p> <p>GO 95, Rule 84.8-C3(b), Clearance Above Ground in Areas Accessible to Pedestrians Only, states in part:</p> <p><i>“Residential Premises: Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet.”</i></p> <p>Comcast identified and repaired a service drop clearance issue at 110 S. Los Angeles Street in August 2013.</p> <p>However, during our field inspection of this location, we found that the service drop connecting to the back unit (114 S. Los Angeles Street) had an approximate vertical clearance of 6 feet. G.O. 95 requires a minimum of 10 feet of vertical clearance for communication drop over areas accessible to pedestrians only. This condition was not documented during the service order completed on August 2013.</p> <p>According to Comcast’s <i>G.O. 95/128 & System Maintenance Day to Day Business Plan</i>, the violation at 114 S. Los Angeles Street should have been captured for repair on August 2013.</p>		