

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 11, 2014

CA2014-002

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

**SUBJECT:** Audit of Comcast, South Bay Division

Dear Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Jamie Lau, and Yusef Collins of my staff conducted a Communication Infrastructure Provider (CIP) audit of Comcast's South Bay Division from March 3 to 7, 2014. 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 findings itemizing the violations is enclosed. Please advise me no later than September 12, 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 Jamie Lau at (415) 703-2233 or [jamie.lau@cpuc.ca.gov](mailto:jamie.lau@cpuc.ca.gov)

Sincerely,

A handwritten signature in dark ink, appearing to read "Fadi Daye".

Fadi Daye, P.E.  
Acting Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC  
Alok Kumar, P.E., Senior Utilities Engineer Supervisor, CPUC  
Jamie Lau, P.E., Utilities Engineer, Electric Safety and Reliability Branch, CPUC  
Yusef Collins, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

## Audit Findings

**Company: Comcast – South Bay Division**

**CIP Audit**

**Date: March 3-7, 2014**

### Violations

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

<b>A.</b>	<b>Location:</b>	13 Boronda Way, Monterey
	<b>Facility:</b>	Overhead Service Drop
	<b>Previous Visit by Comcast:</b>	12/6/2013
	<b>Date Visited by CPUC:</b>	3/4/2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Service Drop Contacting a Guy Wire</u></b>	
	GO 95, Rule 84.4 G, requires 3 inches of minimum separation between guy wires and communication service drops supported on the same poles.	
	A Comcast service drop was in contact with a guy wire.	

B.	<b>Location:</b>	130 Virgin Street, Monterey
	<b>Facility:</b>	Joint Pole
	<b>Previous Visit by Comcast:</b>	11/18/2013
	<b>Date Visited by CPUC:</b>	3/4/2014
<b>Explanation of Violation(s):</b>		
<b><u>Exposed Ground Wire</u></b>		
<p>GO 95, Rule 84.6 B, Ground Wires, states in part:</p> <p style="padding-left: 40px;"><i>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 <a href="#">Rule 22.8-A</a>, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.</i></p> <p>A Comcast ground wire installed on the surface of the pole was partially exposed. The exposed ground wire was less than 7 feet above the ground.</p>		

C.	<b>Location:</b>	311 Casa Verde Way, Monterey
	<b>Facility:</b>	Joint Pole
	<b>Previous Visit by Comcast:</b>	3/1/2013
	<b>Date Visited by CPUC:</b>	3/4/2014
<b>Explanation of Violation(s):</b>		
<b><u>Conductor Contacting a Guy Wire</u></b>		
<p>GO 95, Rule 84.4 G, requires 3 inches of minimum separation between guy wires and communication service drops supported on the same poles.</p> <p>A Comcast communication conductor was in contact with a guy wire.</p>		

D.	<b>Location:</b>	15 Del Monte Avenue, Monterey
	<b>Facility:</b>	Joint Pole
	<b>Previous Visit by Comcast:</b>	6/2/2011
	<b>Date Visited by CPUC:</b>	3/4/2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Facility Not Considered For Pole Loading Calculation</u></b></p> <p>GO 95, Rule 44.1, Installation and Reconstruction, states in part:</p> <p><i>Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in <a href="#">Table 4</a>. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.</i></p> <p>Comcast did not consider a transformer installed on Pole #4 when it performed pole loading calculation.</p>		

<b>E.</b>	<b>Location:</b>	1018 Wainwright Street, Monterey
	<b>Facility:</b>	Overhead Service Drop
	<b>Previous Visit by Comcast:</b>	2/19/2014
	<b>Date Visited by CPUC:</b>	3/4/2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Low Service Drop Clearance</u></b></p> <p>GO 95, Rule 84.8 C1, requires 18 foot above ground clearance for service drops. This clearance could be gradually reduced to 16 feet at the curb line.</p> <p>The above ground clearance of a Comcast service drop at the curb line was 12 feet.</p>		

F.	<b>Location:</b>	1300 Sylvan Road, Monterey
	<b>Facility:</b>	Joint Pole
	<b>Previous Visit by Comcast:</b>	7/25/2011
	<b>Date Visited by CPUC:</b>	3/4/2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Facilities Not Considered For Pole Loading Calculation</u></b></p> <p>GO 95, Rule 44.1, Installation and Reconstruction, states in part:</p> <p><i>Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in <u>Table 4</u>. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.</i></p> <p>Comcast did not consider two guy wires when it performed pole loading calculation for "Pole #11".</p>	

G.	<b>Location:</b>	825 Carmel Avenue, Pacific Grove
	<b>Facility:</b>	Joint Pole
	<b>Previous Visit by Comcast:</b>	1/12/2014
	<b>Date Visited by CPUC:</b>	3/5/2014
<b>Explanation of Violation(s):</b>		
<b><u>Conductor Contacting a Guy Wire</u></b>		
GO 95, Rule 86.4 C3 requires a minimum radial clearance of 3 inches between a communication conductor and a guy wire.		
A Comcast communication conductor was in contact with a guy wire.		

H.	<b>Location:</b>	140 Market Street, Santa Cruz
	<b>Facility:</b>	Joint Pole
	<b>Previous Visit by Comcast:</b>	5/25/2013
	<b>Date Visited by CPUC:</b>	3/6/2014
<b>Explanation of Violation(s):</b>		
<b><u>Exposed Riser</u></b>		
GO 95, Rule 87.7 D1, Risers, states in part:		
<i>Risers shall be protected from the ground level to a level not less than 8 feet above the ground</i>		
A Comcast riser was exposed less than 8 feet above the ground.		

I.	<b>Location:</b>	234 Market Street, Santa Cruz
	<b>Facility:</b>	Joint Pole
	<b>Previous Visit by Utility:</b>	12/14/2013
	<b>Date Visited by CPUC:</b>	3/6/2014
	<b>Explanation of Violation(s):</b>	
	<p data-bbox="248 632 472 663"><b><u>Exposed Riser</u></b></p> <p data-bbox="248 705 862 737">GO 95, Rule 87.7 D1, Risers, states in part:</p> <p data-bbox="342 779 1328 848"><i>Risers shall be protected from the ground level to a level not less than 8 feet above the ground</i></p> <p data-bbox="248 890 1159 921">A Comcast riser was exposed less than 8 feet above the ground.</p>	



J.	<b>Location:</b>	244 Market Street, Santa Cruz
<b>Facility:</b>		Joint Pole
<b>Previous Visit by Comcast:</b>		7/19/2013
<b>Date Visited by CPUC:</b>		3/6/2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Exposed Riser</u></b></p> <p>GO 95, Rule 87.7 D1, Risers, states in part:</p> <p style="padding-left: 40px;"><i>Risers shall be protected from the ground level to a level not less than 8 feet above the ground</i></p> <p>A Comcast riser was exposed less than 8 feet above the ground.</p> <p><b><u>Communication Conductors Contact</u></b></p> <p>GO 95, Rule 38, Table 2, Case 8C, requires 12 inches minimum clearance between two communication conductors supported on the same pole.</p> <p>A Comcast cable was in contact with a telephone cable.</p>		

<b>K.</b>	<b>Location:</b>	306 Market Street, Santa Cruz
	<b>Facility:</b>	Joint Pole
	<b>Previous Visit by Comcast:</b>	2/21/2014
	<b>Date Visited by CPUC:</b>	3/6/2014
<b>Explanation of Violation(s):</b>		
<b><u>Exposed Riser</u></b>		
GO 95, Rule 87.7-D1, Risers, states in part:		
<i>Risers shall be protected from the ground level to a level not less than 8 feet above the ground</i>		
A Comcast riser was exposed less than 8 feet above the ground.		

<b>L.</b>	<b>Location:</b>	110 Village Circle, Santa Cruz
	<b>Facility:</b>	Pedestal
	<b>Previous Visit by Comcast:</b>	11/3/2013
	<b>Date Visited by CPUC:</b>	3/6/2014
<b>Explanation of Violation(s):</b>		
<b><u>Unlocked Pedestal</u></b>		
GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:		
<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>		
A Comcast pedestal at this location was not locked, or otherwise secured from ingress as intended.		

<b>M.</b>	<b>Location:</b>	106 Village Circle, Santa Cruz
	<b>Facility:</b>	Pedestal
	<b>Previous Visit by Comcast:</b>	11/3/2013
	<b>Date Visited by CPUC:</b>	3/6/2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Unlocked Pedestal</u></b></p> <p>GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p><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 Comcast pedestal at this location was not locked, or otherwise secured from ingress as intended.</p>		

<b>N.</b>	<b>Location:</b>	305 Village Circle, Santa Cruz
	<b>Facility:</b>	Pedestal
	<b>Previous Visit by Comcast:</b>	1/31/2014
	<b>Date Visited by CPUC:</b>	3/6/2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Unlocked Pedestal</u></b></p> <p>GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p><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 Comcast pedestal at this location was not locked, or otherwise secured from ingress as intended.</p>		

O.	<b>Location:</b>	315 Village Circle, Santa Cruz
	<b>Facility:</b>	Pedestal
	<b>Previous Visit by Comcast:</b>	1/10/2014
	<b>Date Visited by CPUC:</b>	3/6/2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Unlocked Pedestal</u></b></p> <p>GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p><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 Comcast pedestal at this location was not locked, or otherwise secured from ingress as intended.</p>		