

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 20, 2016

CA2016-002

Gail Long
Manager, State Government Affairs
TDS Telecom
PO Box 1004
Redmond, OR 97756

Subject: Audit of TDS Telecom's Hornitos Exchange

Dear Ms. Long:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Raymond Cho of my staff conducted a Communication Infrastructure Provider (CIP) audit of TDS Telecom's Hornitos Exchange from April 4, 2016 to April 6, 2016. The audit included a review of TDS Telecom's maintenance records and field inspection of the Hornitos Exchange facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than July 21, 2016, by electronic or hard copy, of all corrective measures taken by TDS to remedy and prevent such violations.

If you have any questions concerning this audit please contact Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Electronic Work Order Database
- 4984 Old Toll Rd. Pole Replacement Project

II. Records Review – Violations

GO 95, Rule 18-A2a, states in part:

All companies shall establish an auditable maintenance program for their facilities and lines. All companies must include a timeline for corrective actions to be taken following the identification of a Safety Hazard or nonconformances with General Order 95 on the company's facilities. The auditable maintenance program shall prioritize corrective actions consistent with the priority levels set forth below and based on the following factors, as appropriate...

TDS Telecom's maintenance program did not include due dates for work orders and did not have any provision to prioritize corrective actions.

GO 95, Rule 80.1-A1, Inspection Requirements for Joint-Use Poles in High Fire-Threat Areas, states in part:

In high fire-threat areas, the inspection intervals for (i) Communication Lines located on Joint Use Poles (See Rule 21.8) that contain Supply Circuits (See Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table...

Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.

The area covered by Hornitos Exchange includes high fire-threat areas; however, TDS Telecom does not have an inspection program for high fire-threat areas.

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. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following

factors:

- *Fire threat*
- *Proximity to overhead power line facilities*
- *Terrain*
- *Accessibility*
- *Location*

Each company that discovers a safety hazard on or near a communications facility or electric facility involving another company while performing inspections of its own facilities pursuant to this rule shall notify the other company and/or facility owner of such safety hazard in accordance with Rule 18(B).

Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.

TDS Telecom does not have a Statewide inspection program.

GO 95, Rule 80.1-B, Intrusive Inspections, states in part:

Wood poles in high fire-threat areas that support only Communication Lines or equipment shall be intrusively inspected in accordance with the schedule established in General Order 165 if they are:

- *Interset between joint-use poles supporting supply lines in the high fire threat areas of Southern California.*
- *Within three spans of a joint-use pole supporting supply lines in the high fire-threat areas of Southern California.*
- *Within one span of a joint-use pole supporting supply lines in the high fire-threat areas of Northern California.*

TDS Telecom does not schedule intrusive inspections of solely owned poles.

GO 95, Rule 80.1-A4, Record Keeping, states:

Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a).

Neither of TDS Telecom's patrol or inspection programs include auditable records that identify the date of inspections, results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and personnel who performed each corrective action.

III. Field Inspection

The following are the facilities we inspected during the field inspection:

Structure Number	Type of Structure	Location
5212 Hornitos Rd.	Service Drop	Catheys Valley
5141 Hornitos Rd.	Pedestal	Catheys Valley
Dunn Ranch Rd. and Hornitos Rd.	Pedestal	Catheys Valley
2639 Pine Tree Ct.	Pedestal	Catheys Valley
5012 Indian Gulch Rd.	Pedestal	Catheys Valley
Hornitos Rd. and Blue Oak Dr.	Mobile Digital Shelf Assembly and Pedestal	Catheys Valley
5556 Hornitos Rd.	Pedestal	Catheys Valley
2697 Highway 140	Pedestal	Merced
2907A Trower Rd./B2A-2	Pole and Pedestal	Catheys Valley
Cotton Creek Rd./B7A-1	Pedestal	Hornitos
Exchequer Dam Entrance Gate	Pole	La Grange
Exchequer River Crossing	2x Poles	La Grange
Merced Irrigation District (MID) Pole #11	Pole and Pedestal	La Grange
MID/ 9188 Village Dr.	Pole	La Grange
MID Pole #9	Pole and 2x Pedestals	La Grange
9135 Village Dr.	Service Drop	La Grange
MID Pole #2	2x Poles	La Grange
Boat Club Dr./Near Exchequer	Pedestal and Pole	La Grange
9558 Boat Club Dr.	3x Poles	La Grange
Hunters Valley Rd./B10A-2	2x Pedestals	Mariposa
8111 Hunters Valley Rd.	Pedestal	Mariposa
8016 Hunters Valley Rd.	Pedestal	Mariposa
Pendola Gardens Rd. and Old Toll Rd.	5x Poles and Pedestal	Catheys Valley
6117 School Ln.	2x Poles	Mariposa
4988 Old Toll Rd.	Pedestal	Mariposa
4981 Old Toll Rd.	2x Pedestals and Pole	Mariposa

IV. Field Inspection – Undocumented Violations List

We observed the following violations during the field inspection. None of the violations were documented and/or addressed by TDS Telecom during its last inspections:

GO 95, Rule 84.6-B, Ground Wires, states in part:

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 Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium-hard-drawn copper.

Portions of ground wires which are on the surface of wood poles and within 6 feet of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8).

The TDS ground wire on a pole located at 2907A Trower Rd. was exposed.

GO 95, Rule 31.6, Abandoned Lines, states in part:

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.

The TDS cables on poles at the following locations were abandoned in place:

- 2907A Trower Rd.
- 9558 Boat Club Dr.
- 4981 Old Toll Rd.

GO 95, Rule 84.6-D, Vertical Runs, states in part:

Vertical runs shall be treated as risers (see Rule 87.7-D) where within a distance of 8 feet from ground line.

A pole at the Exchequer Dam entrance gate had a vertical run that was not protected by a riser guard from the ground level to 8 feet above ground:

GO 95, Rule 38, case 8-D, requires that communication conductors maintain a minimum of 48 inches from secondary supply conductors on the same pole.

TDS's conductors on poles at the following locations did not maintain the minimum 48 inch clearance from secondary supply conductors:

- 9188 Village Dr.
- MID Pole #9
- MID Pole #2

GO 95, Rule 84.8-D4, Above or below Supply Service Drops, states:

The radial clearance between communication service drop conductors and supply service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.

TDS's service drop at 9135 Village Dr., was wrapped around and in contact with a supply service drop.

GO 128, Rule 17.1, Design, Construction, and Maintenance, states in part:

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.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.

The following structures were damaged or inaccessible:

- The distribution pedestal at 2697 CA-140 was damaged.
- The wooden pedestal support in front of MID Pole #9 was damaged.
- The distribution pedestal across from pedestal B10A2 was damaged. (Hunters Valley Rd.)
- The distribution pedestal at 4988 Old Toll Rd. was damaged.

GO 128, Rule 34.3-C, Locking, states:

Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.

The following TDS enclosures were not locked:

- The distribution pedestal #B7A1 on Cotton Creek Rd.
- The distribution pedestal near MID Pole #11. (Exchequer)
- The distribution pedestal in front of MID Pole #9. (Exchequer)
- The distribution pedestal at 8111 Hunters Valley Rd.