

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



October 29, 2008

Ross D. Johnson  
AT&T California  
525 Market Street  
19<sup>th</sup> Fl., #33  
San Francisco, CA 94015-2727

**CPUC File No.: CIP2008-01**

**SUBJECT:** Audit of AT&T's Northern Los Angeles Region

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Cynthia Lee and I conducted an audit of AT&T's Northern Los Angeles Region on August 25-28, 2008. The audit included a review of AT&T's maintenance programs for compliance with General Orders (GOs) 95 and 128.

GO 95, Rule 31.2 Inspection of Lines states:

*"Lines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard."*

We found that AT&T does not frequently and thoroughly inspect its overhead system for the purpose of ensuring that it is in good condition so as to conform with GO 95.

GO 128, Rule 17.2 Inspection states:

*"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 these rules."*

GO 128, Rule 22.4 states:

*"A Maintenance Program means a written policy that shall include the following key elements:*

- 1) Inspection intervals*
- 2) Rejection criteria*
- 3) Corrective actions"*

We found that AT&T does not frequently and thoroughly inspect its underground system for the purpose of ensuring that it is in good condition, and does not have a written policy that includes inspection intervals and corrective actions.

Also, AT&T did not document all GOs 95 and 128 violations when it inspected its facilities.

Please advise me within 30 days of corrective measures taken by AT&T to ensure compliance with GOs 95 and 128. If you have any questions, please contact me at (213) 576-7099.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan T. Yamamoto". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ryan T. Yamamoto  
Utilities Engineer  
Utilities Safety and Reliability Branch  
Consumer Protection and Safety Division