

PUBLIC UTILITIES COMMISSION

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February 24, 2009

Esther Northup, Director
State Regulatory Affairs
Cox Communications
350 10th Avenue, Suite 600
San Diego, CA 92101

CPUC File No.: CIP2008-03

SUBJECT: Audit of Cox's Orange County and Palos Verdes Regions Communication Systems

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Cynthia Lee and I conducted an audit of Cox Communications' Orange County and Palos Verdes Regions communication systems on October 27 – 30, 2008. The audit included a review of Cox Communications' design, construction, inspection and maintenance programs, and field inspections of your overhead and underground facilities 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."

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 of these rules."

GO 128, Rule 22.4, states:

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

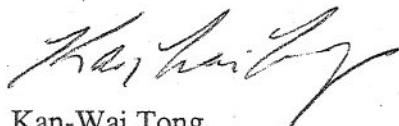
- 1) Inspection intervals*
- 2) Rejection criteria*
- 3) Corrective actions"*

We found that Cox Communications does not thoroughly inspect its overhead and underground systems and does not document all GOs 95 and 128 violations during its inspections. In addition, Cox does not have a written policy that includes inspection intervals and corrective actions for its underground

systems. Attached is a list of GOs 95 and 128 violations that we identified during the field inspections and were not included in your inspection records.

Please advise me within 30 days of corrective measures taken by Cox to ensure compliance with GOs 95 and 128. If you have any questions, please contact me at (213) 576-5700 or Cynthia Lee at (213) 620-2780.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kan-Wai Tong', written in a cursive style.

Kan-Wai Tong
Utilities Engineer
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Inspection Report

Inspection Report

List of GOs 95 and 128 violations that were observed during the audit and were not documented in your records.

GO 95, Rule 31.1, Design, Construction and Maintenance

Rule 31.1 states:

“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.”

- Pole located at 1601 S.E. Skyline Dr., in Santa Ana had a loose “snowshoe” on the span.
- Poles located at 12132 and 12011 Browning Ave., in Santa Ana had terminal lead wires that were not orderly arranged.

GO 95, Rule 31.6, Abandoned Lines

Rule 31.6 states:

“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.”

- Pole located at 12052 Skyline Dr., in Santa Ana had an abandoned service cable.
- Pole located at 12051 Skyline Dr., in Santa Ana had an abandoned guy anchor.

GO 95, Rule 35, Tree Trimming

Rule 35 states:

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of limbs and foliage, in new construction and when circuits are reconstructed or repaired, whenever practicable. When a utility has actual knowledge, obtained either through normal operating practices or notifications to the utility, that any circuit energized at 750 volts or less shows strain or evidences abrasion from tree contact, the condition shall be corrected by slacking or rearranging the line, trimming the tree or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the tree and conductor. Scuffing or polishing of the insulating covering is not considered abrasion. Strain on a conductor is present when there is additional tension causing a deflection of the conductor beyond the slack of the span. Contact between limbs and these conductors, in and of itself, does not constitute a violation of the rule.”

The following poles had communication lines showing signs of abrasion or strain from tree contact:

- Pole located at the corner of S.E. Skyline Dr. and Skyway Dr., in Santa Ana.
- Pole located at 12121 Skyline Dr., in Santa Ana

GO 95, Rule 38, Minimum Clearances of Wires from Other Wires

Table 2, Case 8, Column C, indicates that the minimum allowable clearance between communication conductors from other communication conductors at crossings, in midspans, and at supports shall be 12 inches.

The following poles had cable wires touching the telephone wires:

- Pole located at 12141 Skyline Dr., in Santa Ana
- Pole located at 1215 Aldine Ct., in San Pedro
- Pole located at 4 Toprail Ln., in Rancho Palos Verdes

GO 95, Rule 44.1, Installation and Reconstruction:

“Lines and elements of lines upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4 for vertical loads and loads transverse to lines and for loads longitudinal to lines”

GO 95, Rule 44.2, Replacement:

“Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to deterioration) in Grades “A” and “B” construction to less than two-thirds of the construction safety factors specified in Rule 44.1...”

Your records indicated that your company added facilities on poles numbered P120592, P120591 and P220175. However, your wind loading calculations showed that the safety factors of the poles after the installations ranged from 1.11 to 1.98, which is less than two-thirds (2.67) of the construction safety factors (4) specified in Rules 44.1.

GO 95, Rule 84.8C(3)(b), Residential Premises

Rule 84.8C(3)(b) states:

“Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet.

Exception: If the building served does not permit an attachment which will provide this 10 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches.”

- Pole located at 12061 Browning Ave., in Santa Ana had a low service drop.

GO 95, Rule 84.6B, Ground Wires

Rule 84.6B states:

“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.”

- Pole located at the corner of S.E. Skyline Dr. and Skyline Dr., in Santa Ana had a broken ground molding.

GO 95, Rule 86.2, Use of Guys

Rule 86.2 states:

“Where mechanical loads imposed on poles, towers or structures are greater than can be supported with the safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction. Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire stress, the pole below the point of guy attachment acting merely as a strut. Guys shall be attached to structures as nearly as practicable at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.”

- Pole located at 12051 Skyline Dr., in Santa Ana was missing a down guy.

GO 128, Rule 41.6, Sealing Service Laterals

Rule 41.6 states:

“Service conduits, by which water may enter buildings, shall be suitably plugged or sealed at the source of supply such as utilities’ transformer or secondary handhole, and at the supply end of the conduit that enters the bottom of customer’s terminating enclosure.”

The following surfaced mounted facilities contained unsealed conduits:

- 2235 25th St., in Rancho Palos Verdes
- 6333 Via Colinita, in Rancho Palos Verdes

GO 128, Rule 42.7, Covers

Rule 42.7 states:

“Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal (Also See Rule 17.8 and Appendix B, Figure 9).”

Handholes at the following locations had bolts missing:

- 29029 Covecrest Dr., in Rancho Palos Verdes
- 7100 Camino Pequeno, in Rancho Palos Verdes
- 2964 Via Alvarado, in Palos Verdes Peninsula
- 1404 Via Andres, in Palos Verdes Estates
- 952 Via Del Monte, in Palos Verdes Estates