

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 27, 2009

Ross D. Johnson
Area Manager Regulatory Relations
AT&T Executive Office
525 Market Street
San Francisco, CA 94105-2726

SUBJECT: Audit of AT&T – Castro Valley Yard

On behalf of the Utilities Safety and Reliability Branch (USRB) of the California Public Utilities Commission, Alok Kumar and I conducted an audit of AT&T's Bay Region from November 17-19, 2008. The audit included a review of AT&T's maintenance programs for compliance with General Orders (GOs) 95 and 128.

During the inspection, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Within 30 days, please advise me by electronic or hard copy of all the corrective measures taken, or planned to be taken by the Utility regarding the violation(s) and the date on which they were or will be corrected.

If you have any questions, please contact me at (415) 703-2214.

Sincerely,

A handwritten signature in cursive script that reads "Dennis Lee".

Dennis Lee, P.E.
Utilities Engineer
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

CC: Alok Kumar, Senior Utilities Engineer, CPSD

Audit Summary

Violations

(1) **General Order 95, Rule 31.2 Inspection of Lines**

"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."

General Order 128, Rule 17.2 Inspection

"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."

During our audit, AT&T representatives outlined the variety of methods used by technicians and management to identify GO violations including, but not limited to the "611" Calls, PUC Complaints, Executive Office Calls, Customer Calls, AT&T P3028, Construction & Engineering (C&E), Installation & Maintenance (I&E), and C&E and I&E Quality Inspections. While these methods provide the opportunity to identify GO violations, they cannot be considered as an acceptable inspection program that meets the requirements of GO 95 Rule 31.2 and GO 128 Rules 17.2. Specifically, these GO rules mandate that all lines be inspected by the utility thoroughly and frequently. Our audit found that AT&T does not perform inspections that encompass all of the Utility's overhead and underground lines. AT&T's current programs evaluate only a small portion of their lines, and do not meet the intent of the rules.

AT&T must create an inspection/maintenance program that meets the requirements of GO 95 Rule 31.2 and GO 128 Rules 17.2.

(2) **11/18/08 – Meekland Avenue & B Street, Hayward
Project Number: 5405368; AT&T Completed on 6/2008**

While verifying the work completed at the above address, we discovered the two following violations.

I. General Order 95, Rule 31.1 Design, Construction and Maintenance

"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. (emphasis added)

The pole mounted terminal box was not attached to the pole.

II. General Order 95, Rule 84.8 Service Drops

C. Clearances above Ground and Buildings

"The vertical clearances shall not be less than the minimum clearances specified in Rule 37, Table 1, Column B, with the following modifications:

(1) Above Public Thoroughfares: Vertical clearance shall not be less than 18 feet.

Exception: *Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line."*

The service drop to 134 B Street had a vertical clearance of 15 feet at the curb.

Project #5405368 was completed by AT&T on 6/2008 and therefore, these violations should have been found and completed. AT&T response dated 12/23/2008 noted that the pole mounted terminal box violation is scheduled to be completed on 2/2009 and the low service drop to 134 B Street has been completed.

- (3) **11/18/08 – 769 Delano Street, San Leandro**
Project Number: 6006964, AT&T Completed on 4/2008

While verifying the work completed at the above address we discovered the following violation.

General Order 95, Rule 84.8 Service Drops

C. Clearances above Ground and Buildings

"The vertical clearances shall not be less than the minimum clearances specified in Rule 37, Table 1, Column B, with the following modifications:

(1) Above Public Thoroughfares: Vertical clearance shall not be less than 18 feet.

Exception: *Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line."*

The service drops to 772, 776, & 780 Delano Street had vertical clearances of 14 feet at the curb.

The violation is located on an adjacent pole that was worked on. AT&T response dated 12/23/2008 noted that the low service drops to 772, 776, & 780 Delano Street have been completed.

- (4) **11/18/08 – 20065 Lake Chabot Road, Castro Valley**
Project Number: 5121662, AT&T Completed on 11/2007

While verifying the work completed at the above address we discovered the following violations.

I. General Order 95, Rule 84.4 Clearances

A. Above Ground

"(6) Across or along Public Thoroughfares:

Communication conductors over or across public thoroughfares shall have a clearance of 18 feet above ground (Table 1, Case 3, Column B). A reduced clearance to 16 feet is permitted for the portions of communication conductors where no part of the line overhangs any part of the thoroughfare which is ordinarily traveled, or where the line is behind an established curb, ditch or berm that serves to protect such communication conductors from encroachment by vehicular traffic."

Two low spans at the mid-span near 20065 Lake Chabot Road had vertical clearances of 15 feet 11 inches and 17 feet and 2 inches at the street (not behind a curb).

II. General Order 95, Rule 91.3 Stepping

A. Use Of Steps

"(1) Poles with Vertical Runs or Risers: All jointly used poles which support supply conductors shall be provided with pole steps if vertical runs or risers are attached to the surface of such poles."

No pole steps on an adjacent jointly used pole from Project #5121661 pole.

III. General Order 95, Rule 84.6 Vertical and Lateral Conductors

D. Vertical Runs

"Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches."

The vertical run is not attached to the pole every 24 inches.

The violations are located on the adjacent poles and at the mid-span. Project #5121661 was completed by AT&T on 11/2007 and therefore, the low span violations should have been found and completed. AT&T response dated 12/23/2008 noted that the low span, step pole, and riser strap violations are scheduled to be completed on 2/2009.

- (5) 11/19/08 – 1622 Thrush Avenue, San Leandro
Quality Work Order Number: PE17P599, Completed 11/18/08

While verifying a completed quality inspection at the above address we discovered the following violations.

General Order 95, Rule 84.8 Service Drops

C. Clearances above Ground and Buildings

"The vertical clearances shall not be less than the minimum clearances specified in Rule 37, Table 1, Column B, with the following modifications:

(1) Above Public Thoroughfares: Vertical clearance shall not be less than 18 feet.

Exception: *Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line."*

The service drops to 1640 and 1660 Thrush Avenue had vertical clearances of 15 feet 5 inches at the curb.

Quality #PE17P599 was completed by AT&T on 11/18/2008 and therefore, the low service drop violations should have been found and completed. AT&T response dated 12/23/2008 noted that the low service drops have been completed.

Concerns and Recommendations

Identifying GO Violations During the Course of Normal Business Work

AT&T management explained that the Utility already identifies and remediates GO violations through its normal course of business work. AT&T cited the "611" Calls, PUC Complaints, Executive Office Calls, Customer Calls, AT&T P3028, C&E, I&E, and C&E and I&E Quality Inspections. However, our field verifications found this not to be the case. As evidenced by the GO violations listed in this audit letter, it is clear that there are many violations that are not being caught by AT&T Technicians. This evidence supports the need for AT&T to both reinforce its own procedures to identify GO violations during the course of normal business work, as well as to create a compliant GO inspection program.