

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 22, 2009

Ross Johnson
AT&T California
525 Market Street
19th Floor, #33
San Francisco, CA 94015-2727

SUBJECT: Audit of AT&T's Sacramento and Yolo Counties

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Ivan Garcia and I conducted an audit of AT&T's facilities in Sacramento and Yolo Counties on November 16-18, 2009. The audit included a review of AT&T's maintenance programs for compliance with General Orders (GOs) 95 and 128.

During our audit, we found that AT&T does not frequently and thoroughly inspect its facilities and document all General Order (GO) 95 and 128 violations. We found GO 95 violations in areas your company had recently performed work. The violations were not documented or addressed during your inspections. See attached List of Field Violations.

Also, when reviewing an AT&T project at the intersection of Kiefer Boulevard and Tallyho Drive, we observed an incorrect pole loading calculation and installation. AT&T stated to us during the audit that the down guys on two poles will be increased in size to correct the incorrect pole loading calculations. Please provide us corrective measure that will be taken by AT&T to ensure this mistake does not happen again.

The frequency of inspections must be determined by AT&T at a level adequate enough to ensure that your facilities are in good condition and in compliance with GOs 95 and 128. A thorough inspection of your facilities involves a careful visual examination or routine diagnostic tests, to address and record unsafe conditions, and GO 95 and 128 violations.

While you have programs in place they provide the opportunity to identify GO violations, they cannot be considered as an inspection program that meets the requirements of GO 95, Rule 31.2, and GO 128, Rules 12.2 and 17.2. Specifically, GO rules mandate that all lines be inspected thoroughly and frequently. Our audit found that AT&T does not perform inspections that encompass all of the overhead and underground lines.

AT&T did not have an auditable maintenance program in place required by GO 95, Rule 18 that followed the listed principles in that rule.

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) 700-6774.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan T. Yamamoto", with a large, sweeping flourish extending to the right.

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

List of Field Violations

Location	General Order	Finding	Last Recorded Date AT&T Visited	Date of CPUC Audit Visit
7342 21 st Street	GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 8	AT&T and cable television lines in contact with each other	11/16/09	11/17/09
1834 Alabama Avenue	GO 95, Rule 34, Foreign Attachments	Unauthorized attachment	10/26/09	11/17/09
Alabama Avenue	GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 3	Low span guy over street measured at 14'9".	10/26/09	11/17/09
1208 39 th Street	GO 95, Rule 35, Vegetation Management	Service drop strained by tree branch on pole that was worked	10/27/09	11/17/09
Florin Road/Bradshaw Road	GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19	AT&T line and down guy clearance issue	3/31/09	11/18/09
Florin Road/Bradshaw Road	GO 95, Rule 31.1, Design, Construction, and Maintenance	Ground exposed at ground level	3/31/09	11/18/09
Madison Avenue/Garfield Avenue	GO 95, Rule 31.1, Design, Construction and Maintenance	Broken lashing wire over driveway	06/19/09	11/18/09
Madison Avenue/Garfield Avenue	GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19	AT&T line and down guy clearance issue	06/16/09	11/18/09
Marconi Avenue/Eastern Avenue	GO 128, Rule 32.7, Covers	General practice issue. Lid to facilities were missing two bolts.	08/08	11/18/09
9 th Avenue/Stockton Boulevard	GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 8	AT&T and cable television lines in contact with each other	10/20/09	11/18/09