

PUBLIC UTILITIES COMMISSION

VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 4, 2011

Ross Johnson
Associate Directory – Regulatory
AT&T California
525 Market Street, 19th Floor, #33
San Francisco, CA 94105

SUBJECT: Communication Audit of AT&T's South Region – San Diego County

Dear Mr. Johnson:

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission, Cynthia Lee and I conducted an audit of AT&T's South Region – San Diego County on December 6 – 10, 2010. The audit included a review of AT&T's records and field inspections of AT&T's facilities that had been recently inspected by AT&T staff.

During the audit, I identified violations of General Orders (GO) 95 and 128, and Commission Decision 09-08-029. A copy of the inspection summary itemizing the violations is enclosed. Please advise me no later than February 7, 2011, by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

If you have any questions, you can contact me at (213) 576-6850.

Sincerely,

A handwritten signature in black ink, appearing to read "Derek Fong".

Derek Fong
Utilities Engineer
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

AUDIT SUMMARY

Company: AT&T South Region – San Diego County

Date: December 6 – 10, 2010

The following violations were observed:

1. **GO 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.”

GO 128, Rule 12.2: Maintenance

“Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.”

GO 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, we found that AT&T does not frequently and thoroughly inspect its facilities and document all GOs 95 and 128 violations, and does not perform inspections that encompass all of the overhead and underground lines. 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 should include a detailed inspection to address and record unsafe conditions, and GOs 95 and 128 violations. Your current inspection program does not meet the requirements of GOs 95, Rule 31.2, and GO 128, Rules 12.2 and 17.2.

2. **Public Utilities Commission Decision 09-08-029 Ordering Paragraph**

“Communication Infrastructure Providers shall begin performing patrol inspections of their facilities in designated Extreme and Very High Fire Threat Zones... ‘Patrol inspection’ shall be defined as a simple visual inspection of applicable communications infrastructure equipment and structures that is designed to identify obvious structural problems and hazards.”

In its patrols, AT&T did not document these obvious problems and hazards:

- Five down guy wires were not taut.
- An overhead guy wire was not taut.
- An anchor road was coming out of the ground.
- Two ground wires were not suitably covered.
- A ground wire was damaged and not suitably covered.

During the field portion of our audit, we observed the following violations:

1. **GO 95, Rule 84.6B: Ground Wires**

“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.”

- 1) Pole 412762 – an AT&T ground wire was not suitably covered. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 2) Pole 412081 – an AT&T ground wire was not suitably covered. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 3) Pole 312952 – an AT&T ground wire was damaged. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 4) Pole 415554 – an AT&T ground wire had damaged ground covering. This was not documented by AT&T when it inspected the pole on 6/15/10.

2. **GO 95, Rule 86.9: Guy Marker (Guy Guard)**

“A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.”

- 1) Pole 317738 – an AT&T down guy wire did not have a guy guard. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 2) Pole 514791 – an AT&T guy guard was detached from its down guy wire. This was not documented by AT&T when it inspected the pole on 6/15/10.
- 3) Pole 718097 – an AT&T down guy wire did not have a guy guard. This was not documented by AT&T when it inspected the pole on 6/15/10.
- 4) Pole 1034428H – an AT&T down guy wire did not have a guy guard. This was not documented by AT&T when it inspected the pole on 6/29/10.
- 5) Pole 210018 – three AT&T down guy wires did not have a guy guard. This was not documented by AT&T when it inspected the pole on 6/29/10.

3. **GO 95, Rule 86.2: Overhead Guys, Anchor Guys and Span Wires**

“They [guys] shall be maintained taut and of such strength as to meet the safety factors of Rule 44.”

- 1) Pole 318895 – two AT&T down guy wires were not taut. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 2) Pole 133238 – an AT&T down guy wire was not taut. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 3) Pole 312946 – an AT&T down guy wire was not taut. This was not documented by AT&T when it inspected the pole on 5/26/10.

- 4) Pole 510116 – an AT&T anchor rod was coming out of the ground. This was not documented by AT&T when it inspected the pole on 6/29/10.
- 5) Pole 210018 – an AT&T down guy wire was not taut. This was not documented by AT&T when it inspected the pole on 6/29/10.
- 6) Pole 113908 – an AT&T overhead guy was not taut. This was not documented by AT&T when it inspected the pole on 6/29/10.

4. GO 95, Rule 84.7E: Allowable Climbing Space Obstructions

“... Unnecessary impairment of the climbing space is not permitted by the application of this Rule 84.7-E.”

- 1) Pole 133238 – an uncovered AT&T ground wire was installed across the climbing space. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 2) Pole 610986 – an uncovered AT&T communications cable was in the climbing space. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 3) Pole 233512 – an uncovered AT&T communications cable was in the climbing space. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 4) Pole 410173 – an uncovered AT&T communications cable was in the climbing space. This was not documented by AT&T when it inspected the pole on 6/29/10.

5. GO 95, Rule 38: Minimum Clearances of Wires from other Wires

Table 2, Case 8, Column D requires that the separation of communication conductors and 0 – 750V supply conductors be at least 48 inches. [Exception: May be reduced to 36 inches at midspan only when the supply conductors consist of abrasion resistant cable with a grounded metallic sheath or neutral-supported cable.]

Pole 616346 – Between Pole 616346 and Pole 718138, an AT&T communications cable had less than a 36 inch separation, at midspan, from an electric service conductor. This was not documented by AT&T when it inspected the pole on 5/26/10.

6. GO 95, Rule 35: Tree Trimming

“Where overhead wires pass through trees, safety and reliability of service demand that tree trimming be done in order that the wires may clear branches and foliage by a reasonable distance... Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of limbs and foliage...”

- 1) Pole 718138 – Between Pole 718138 and Pole 718139, an AT&T communications cable was strained by a tree. This was not documented by AT&T when it inspected the pole on 5/26/10.

- 2) Pole 510111 – an AT&T communications cable was strained by a tree. This was not documented by AT&T when it inspected the pole on 6/29/10.
- 3) Pole 115147 – an AT&T communications cable was strained by a tree. This was not documented by AT&T when it inspected the pole on 6/29/10.
- 4) Pole 311540 – two AT&T communications cables were strained by a tree. This was not documented by AT&T when it inspected the pole on 6/29/10.

7. GO 95, Rule 31.6: Abandoned Lines

“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 that are determined by their owner to have no foreseeable future use”.

- 1) Pole 718139 – an AT&T communications cable was abandoned. This was not documented by AT&T when it inspected the pole on 5/26/10.
- 2) Pole 611790 – two AT&T communications cables were abandoned. This was not documented by AT&T when it inspected the pole on 6/29/10.
- 3) Pole 212821 – two AT&T communications cables were abandoned. This was not documented by AT&T when it inspected the pole on 6/29/10.
- 4) Pole 712779 – an AT&T communications cable was abandoned. This was not documented by AT&T when it inspected the pole on 6/29/10.

8. GO 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”.

Pole 718257 – an AT&T ground wire was not secured to the pole. This was not documented by AT&T when it inspected the pole on 5/26/10.

9. GO 95, Rule 38: Minimum Clearances of Wires from other Wires

Table 2, Case 8, Column C requires that the separation of communication conductors from each other be at least 12 inches.

Pole 138652 – an AT&T communications cable had less than a 12 inch vertical separation, at midspan, from a cable-TV line. This was not documented by AT&T when it inspected the pole on 6/29/10.

10. GO 95, Rule 84.8D(4): Above or below Supply Service Drops

"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".

Pole 312658 – an AT&T communications service drop had less than a 24 inch separation from an electric service drop 15 feet from the point of attachment. This was not documented by AT&T when it inspected the pole on 6/29/10.

11. GO 95, Rule 38: Minimum Clearances of Wires from other Wires

Table 2, Case 16, Column C requires that the separation of conductors, taps or lead wires of different circuits (v, y, s) and communication conductors be at least 3 inches.

Pole 818461 – an AT&T communications service drop was touching a cable-TV service drop. This was not documented by AT&T when it inspected the pole on 6/29/10.