#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



November 16, 2010

Lorraine A. Kocen Regulatory Policy and Planning Verizon Communications 112 S. Lakeview Canyon Road, CA501LS Thousand Oaks, CA 91362

**SUBJECT:** Audit of Verizon – City of Manteca

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Ivan Garcia and I conducted an audit of Verizon's facilities in Manteca on 11/2-4/10. The audit included a review of Verizon maintenance programs for compliance with General Orders (GOs) 95 and 128.

During records review, we noticed a quality inspection worksheet indicating that "trees hanging or pulling drop down" at 6846 E. Division Road, Manteca, however, we discovered that the violation was still present during the CPUC field visit. In addition, a "Complete a Plant Condition Report" for defects which cannot be repaired, was not issued by your field technicians as required by your T-Zone Bulletin.

### 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."

## GO 128, Rule 12.2 Maintenance, states:

"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, 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 "

We found that Verizon is in violation of GO 95, Rule 31.2, and GO 128, Rules 12.2 and 17.2 for not inspecting its facilities frequently and thoroughly, and documenting all GOs 95 and 128 violations. The frequency of inspections must be determined by Verizon 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. In addition, Verizon does not perform inspections that encompass all of the overhead and underground lines, and does not have an auditable maintenance program that meets the requirement of GO 95, Rule 18A.

Attached is a list of GO 95 and GO 128 violations we discovered in area your company had recently performed work. During the audit, your company could not provide me with GO violation generated tickets, please provide all current GO violation generated tickets and all past due GO generated tickets for the last two years.

Please advise me within 30 days of corrective measures taken by Verizon to ensure compliance with GOs 95 and 128. If you have any questions, you can contact me at (916) 928-2109.

Sincerely,

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 Verizon Visited	Date of CPUC Audit Visit
6846 E. Division Road, Manteca	GO 95, Rule 84.6D	Unsupported vertical run	9/15/10	11/3/10
6846 E. Division Road, Manteca	GO 95, Rule 35	Tree pulling on service drop	9/15/10	11/3/10
Union Rd/Woodward Ave., Manteca	GO 95, Rule 31.1	Broken lashing wire	6/26/09	11/3/10-
6796 E. Woodward, Manteca	GO 95, Rule 31.1	Lose vertical run/wood guard	10/27/10	11/3/10
6796 E. Woodward, Manteca	GO 95, Rule 38, Table 2, Case 16C	Verizon wire touching CATV wire	10/27/10	11/3/10
Airport Way, Manteca	GO 95, Rule 38, Table 2, Case 8C	Verizon wire touching CATV wire at midspan	7/31/09	11/3/10
411 Eva Drive, Manteca	GO 95, Rule 38, Table 2, Case 16C	Verizon wire touching CATV service drop	10/28/10	11/3/10
329 Frances St, Manteca	GO 95, Rule 37, Table 1, Case 5B	Low service drop	10/15/10	11/3/10