

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 18, 2010

John Gutierrez
Director – Government Affairs
Comcast
3055 Comcast Plaza
Livermore, CA 94551

SUBJECT: Audit of Comcast – City of Roseville

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Ivan Garcia and I conducted an audit of Comcast's facilities in Roseville on 9/13-15/10. The audit included a review of Comcast maintenance programs 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. 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 “

During our audit, we found that Comcast 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 Comcast 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 GO 95, Rule 31.2, and GO 128, Rules 12.2 and 17.2.

In addition, Comcast did not have an auditable maintenance program that meets the requirement of GO 95, Rule 18A.

When reviewing the data sheet of completed work, we found that it was not accurate at the time of the audit. The technicians used incorrect codes and information related to SRO job class was missing from the data sheet.

We also found GO 95 and GO 128 violations in area your company had recently performed work. See attached table.

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

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 Comcast Visited	Date of CPUC Audit Visit
212 Grape Street, Roseville	GO 95, Rule 84.6F	Lose riser straps	9/1/10	9/14/10
325 El Dorado Avenue, Roseville	GO 95, Rule 84.4A3 (Table 1, Case 5B)	Low service drop	9/6/10	9/14/10
325 El Dorado Avenue, Roseville	GO 95, Rule 34	Un-authorized attachment	9/6/10	9/14/10
325 El Dorado Avenue, Roseville	GO 95, Rule 38, Table 2, Case 16C	Comcast cable touching telephone wire	9/6/10	9/14/10
1100 Roseville Pkwy, Roseville	GO 128, Rule 17.1	Pedestal cover off	2/19/10 (Records) 9/4/10 (Audit)	9/14/10
2004 S Cirby Way, Roseville	GO 95, Rule 38, Table 2, Case 19C	Comcast cable touching down guy	8/30/10	9/14/10
2004 S Cirby Way, Roseville	GO 95 Rule 38, Table 2, Case 16C	Comcast cable sagging low into telephone wire	8/30/10	9/14/10
1135 Conroy Lane, Roseville	GO 95, Rule 84.6D	Missing riser guard	9/6/10	9/14/10
1135 Conroy Lane, Roseville	GO 95 Rule 38, Table 2, Case 16C	Comcast cable sagging low into telephone wire	9/6/10	9/14/10
230 Cedar Street, Roseville	GO 95 Rule 38, Table 2, Case 16C	Comcast cable sagging low into telephone wire	4/1/10	9/15/10