PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



September 19, 2011

FILE NO. CA2011-001

Susan Lipper T-Mobile USA Senior Manager, Government Affairs 1755 Creekside Oaks Drive, Suite 190 Sacramento, CA 95833

SUBJECT: Communication Infrastructure Provider (CIP) Audit of T-Mobile USA in Ventura, Los Angeles, and San Bernardino Counties

Dear Ms Lipper:

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission, I conducted a CIP audit of T-Mobile USA in Ventura, Los Angeles, and San Bernardino Counties on May 16 through May 19, 2011.

I found that T-Mobile USA's personnel did not document all General Orders (GO) 95 violations at the time of inspections. Attached to this letter is a list of the violations I observed during the audit.

Within 30 days from the date of this letter, provide us with a written response indicating the corrective measures taken by T-Mobile USA regarding the violations noted, and the dates they were, or will be, corrected.

If you have any questions, you may contact me at (213) 576-7016.

Sincerely,

Mahmoud (Steve) Intably, P.E.

Utilities Engineer

Utilities Safety and Reliability Branch

Consumer Protection and Safety Division

Enclosure: Violations List

Violations List

List of General Orders (GO) 95 violations that were observed during the audit and were not documented in T-Mobile USA's inspection records.

GO 95, Rule 31.1 Design, Construction and Maintenance

Rule 31.1 states:

"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..."

- Cell sites IE04818 and IE04813 had damaged riser's casings.
- Cell site SV00808A had a loose box cover.
- Cell site SV00808A had an open disconnect box.
- T-Mobile USA facilities on cell site SV00755A should be transferred to the new pole.
- Cell site SV00812 had an open Remote Electrical Tilt (RET).
- Cell site IE04812 had a damaged breaker box.
- Each of cell sites SV00934 and SV00936 had an open microcell terminal's cover.
- Cell site IE04816 had a support bracket that posed a safety hazard to pedestrian.
- Cell site SV00761 had a RET that posed a safety hazard to pedestrian.

Each of the following cell sites had a damaged ground molding:

SV00777

IE04819

IE04816

IE04817

• IE04812

GO 95, Rule 31.6 Abandoned Lines

Rule 31.6 states:

"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..."

Each of the following cell sites had an abandoned fiber optic cable:

- SV00810A
- SV00936

SV00804A

GO 95, Rule 84.6D, Vertical Runs

Rule 84.6D stats:

"...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..."

Each of the following cell sites had a vertical run that was not supported every 24 inches:

- IE04822
- IE04816
- IE04813

- SV00755A
- Cell site located at 8349 W Mulholland Dr.

GO 95, Rule 87.7D(1)(a) requires a steel riser's casing to be securely and effectively grounded.

Each of the following cell sites had a steel riser's casing that was insecurely and ineffectively grounded:

- SV00804A
- SV00808

• Cell site located at pole number 2171604E

GO 95, Rule 92.1F(2), Cable Terminals or Metal Boxes

Rule 92.1F(2) states:

"On jointly used poles metal communication cable terminals, metal boxes or similar equipment which are less than 8 inches from center line of pole or are attached to surface of pole shall be placed not less than 6 feet vertically below or 3 feet above the level of the nearest unprotected supply conductor. All parts of such metal terminals, boxes or similar equipment which are 8 inches or more from center line of pole shall have vertical clearances from conductors not less than the clearance specified in Table 2, Col. C, Cases 8 to 13 inclusive."

Each of the following cell sites had a cable terminal or metal box passing a communication cable with less than 12 inches of vertical separation:

- SV00810A
- SV00739-01
- SV00743

- SV00745-01
- SV00812
- IE04821
- SV00761

• located at 13300 ½ Mulholland Dr.

GO 95, Rule 93, Climbing Space

Rule 93 states:

"Climbing space shall be provided on all jointly used poles which support conductors and the provisions of Rules 54.7 and 84.7 are directly applicable to such poles. Climbing space on jointly used poles shall be so correlated between conductor levels that its position in relation to the pole is not changed by more than 90 degrees in a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level."

Cell site SV00761-01 had a facility installed in climbing space.

GO 95, Rule 94.5, Marking

Rule 94.5 states:

- "A. No antenna owner or operator shall install an antenna on a joint use pole unless such installation is subject to an agreement with the pole owner(s) that includes marking requirements that are substantially similar to and achieve at least the same safety standards as those set forth in Appendix H to GO 95.
- **B.** Joint use poles shall be marked with a sign for each antenna installation as follows:
- (1) Identification of the antenna operator
- (2) A 24-hour contact number of antenna operator for Emergency or Information
- (3) Unique identifier of the antenna installation."

Each of the following cell sites was not marked with a sign:

- SV00813A
- SV00804A
- SV00808A
- SV00810A
- SV00936
- SV11027C
- SV00817B
- SV11087
- DV11007
- SV00779
- SV00777
- SV00755A
- SV00921-C1
- SV 00739-01
- SV00743

- SV00745-01
- SV00738-01
- SV00744-01
- SV00780A
- 16311C-1
- TEO 4000
- IE04822
- IE04821
- IE04820
- IE04819
- IE04818
- IE04817
- IE04811
- IE04812
- SV00768

- SV00769
- SV00761
- Cell site located at 13300 ½ Mulholland Dr.
- Cell site located at 8349 W Mulholland Dr.