

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 14, 2012

Horizon Cable TV Inc.

Kevin Daniel
P.O. Box 1240
Point Reyes Station, CA 94956

SUBJECT: Audit of Horizon's Communications Facilities

On behalf of the Utilities Safety and Reliability Branch (USRB) of the California Public Utilities Commission, Alok Kumar, Ken How and I conducted an audit of Horizon's communications facilities in the cities of Dillion Beach, Inverness, Point Reyes Station and Stinson Beach on March 5-6, 2012. The audit included a discussion of the new GO95 rules related to communication companies. We also did field inspections for compliance with General Order (GOs) 95 rules.

During the inspection, we identified violations of General Order 95. A copy of the audit summary itemizing the violations is enclosed. Within 30 days, please advise me by electronic or hard copy of all the corrective measures taken, or planned to be taken by the Utility regarding the violation(s) and the date on which they were or will be corrected.

If you have any questions, please contact me at (415) 703-1817.

Sincerely,

A handwritten signature in cursive script that reads "Paul Penney".

Paul Penney, P.E.
Utilities Engineer
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

cc: Ken How

Audit Summary

Violations

General Order 95, Rule 31.2 Inspection of Lines

"Lines shall be inspected frequently and thoroughly for the purpose of ensuring 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.

A. *Communication Lines (See Rule 80.1)*

B. *Supply Lines shall be inspected in compliance with the requirements of General Order 165."*

Horizon currently does not have procedures describing its inspection program that is mandated by GO95, Rules 31.2, 18 and 80.1. Please provide us with a plan for completing these inspection procedures, and an estimated completion date.

Field Audit

Below are violations found while doing field inspections in the cities of Dillion Beach, Inverness, Point Reyes Station and Stinson Beach.

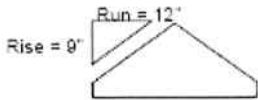
1. General Order 95 (GO95), Rule 84.8(C)

"From Buildings and Structures: Service drops should be arranged so as not to hamper or endanger firefighters and workers in performing their duties.

Service drops are not required to clear buildings [by] any specified horizontal distance but shall be so installed that they do not interfere with the free use of fire escapes, windows, doors and other points at which entrance or exit might be expected.

Service drops are not required to clear the roofs of buildings on the premises served any specified vertical distance. The vertical clearance above buildings on premises other than the one being served shall not be less than 8 feet, except that a reduction to not less than 2 feet is permitted under either of the following conditions;

(a) *Over roofs whose slope exceeds 9 inches of rise per 12 inches of run (see sketch), or*



(b) *Over roofs where the service drop does not overhang the building by more than 6 feet."*

The service drop going to 52 Loraine in Point Reyes Station was lying on the roof of one structure. The vertical clearances above the roof must meet the requirements identified in Rule 84.8(C) above depending on whether the cable is serving the structure or not serving the structure.

2. GO95, Rule 86.2

"...Guys shall be attached to structures as nearly as practicable at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."

- a. The anchor guy needs to be tightened at 65 Manana Way, Point Reyes Station.
- b. The span guy at Shoreline and Viento Way is slack.

3. GO95, Rule 84.8B3b

“Residential Premises: Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet.”

The service drop going to 11549 High 1, Point Reyes Station was very low. It needs to be raised.

4. GO95, Rule 31.6

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

- a. The mainline cable at 39 Viento Way, Point Reyes Station is abandoned and needs to be removed.
- b. A service drop at 117 Cypress Ave., Dillon Beach was hanging down, and is apparently abandoned.
- c. The pole in front of 66 Ocean View Ave., Dillon Beach had a service drop wrapped around it.
- d. A pole adjacent to the fire department at Stinson Beach is abandoned. The communication facilities were transferred to a new pole.

5. GO95, Table 2, Case 16, Column C

Communication conductors are required to have a minimum radial separation of 3 inches.

- a. The radial separation for the service drops going to 125 Cypress Ave, Dillion Beach was <3”. The service drop needs to be rearranged to all for more separation.
- b. The service drops going to 138 Cypress Ave., Dillion Beach were touching.
- c. The service drop is twisted around phone at 385 Aberdeen, Inverness.
- d. The service drop is touching phone going to 420 Aberdeen, Inverness.

6. GO95, Table 2, Case 8, Column C

Mainline communication conductors must have a minimum radial separation of 1 foot between conductors at midspan. The phone and cable mainline conductors were touching on the last span on Ocean View Ave, Dillon Beach.

7. GO95, Rule 84.8(C)(2)(b)

“Residential Premises: Over residential driveways, lanes or over property accessible to vehicles, service drops shall not be less than 12 feet.

EXCEPTION: If the building served does not permit an attachment which will provide this 12 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible, but in no case less than 10 feet.”

The service drop to 59 Ocean View Ave. was low going over the drive way.

8. GO95, Table 1, Case 3, Column B

The main line cable conductor paralleling the the roadway near the Stinson Beach Motel (3416 Shoreline Highway) was measured at 15 feet 4 inches. The minimum required vertical clearance is 18 feet.

9. GO95, Rule 84.8(C)(1)

"Above Public Thoroughfares: Vertical clearance shall not be less than 18 feet.

EXCEPTION: Not more than 12 feet horizontally from the curb line, the 18 foot clearance may be gradually reduced to not less than 16 feet at the curb line. In no case shall the clearance at the center line be less than 18 feet. Where there are no curbs, the foregoing provisions shall apply using the outer limits of normal longitudinal vehicular movement in lieu of a curb line."

The service drop going to 3 Marine Way was low at 13 feet 4 inches.