

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 3, 2013

CA2013-003

Mr. Ross Johnson, Area Manager, Regulatory  
AT&T  
525 Market Street  
19<sup>th</sup> Floor, #33  
San Francisco, CA 94015-2727

Subject: Audit of AT&T Benicia, Fairfield and Vallejo

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Ivan Garcia, Yusef Collins and Ryan Yamamoto conducted an audit of AT&T Solano County on April 8-10, 2013. The audit included a review of AT&T's maintenance records and inspections of AT&T's facilities.

During audit, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than July 12, 2013, by electronic or hard copy, of all corrective measures taken by AT&T California to remedy and prevent such violations.

If you have any questions concerning this audit you can contact, Ryan Yamamoto of my staff at (415) 703-2192 or [ryan.yamamoto@cpuc.ca.gov](mailto:ryan.yamamoto@cpuc.ca.gov).

Sincerely,

A handwritten signature in purple ink, appearing to read "Raymond Fugere".

Raymond Fugere, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosures: CPUC Audit Summary

CC: Ivan Garcia, Utilities Engineer, CPUC  
Yusef Collins, Utilities Engineer, CPUC  
Ryan Yamamoto, Senior Utilities Engineer, CPUC

## AUDIT SUMMARY

**Company: AT&T California – Solano County  
 Communication Infrastructure Provider Audit  
 Date: April 8-10, 2013**

<b>1.</b>	<b>Location:</b>	<b>Solano County</b>
	<b>Date Visited by CPUC:</b>	4/8-4/10/13
<b>Explanation of Violation(s):</b>		
<b><u>Inspection &amp; Maintenance Program Deficiencies</u></b>		
<p>GO 95, Rule 80.1A-2, Statewide Inspection Requirements, states in part:</p> <p style="text-align: center;"><i>Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State. Consistent with Rule 31.2, the type, frequency, and thoroughness of inspections shall be based upon...</i></p> <p>GO 128, Rule 12.2, Design, Construction, and Maintenance, states in part:</p> <p style="text-align: center;"><i>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.</i></p> <p>GO 128, Rule 17.2, Inspection, states:</p> <p style="text-align: center;"><i>Systems shall be inspected by the operator frequently and thoroughly for the purpose of ensuring [sic] that they are in good condition and in conformance with all applicable requirements of these rules.</i></p> <p>AT&amp;T does not <b>frequently</b> 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&amp;T at a level adequate enough to ensure that your facilities are in good condition and in compliance with GOs 95 and 128. AT&amp;T's current inspection program does not meet the requirements of GO 95, Rule 80.1-A2 and GO 128, Rules 12.2 and 17.2.</p>		

2.	<b>Location:</b>	<b>Solano County</b>
	<b>Date Visited by CPUC:</b>	4/8-4/10/13
	<b>Explanation of Violation(s):</b>	
	<p data-bbox="345 344 760 380"><b><u>Corrective Action Deficiencies</u></b></p> <p data-bbox="345 415 1276 485">GO 95, Rule 18-A1a, Resolution of Safety Hazard and General Order 95 Nonconformances, states:</p> <p data-bbox="472 527 1365 632"><i>Each company (including utilities and CIPs) is responsible for taking appropriate corrective action to remedy Safety Hazards and GO 95 nonconformances posed by its facilities.</i></p> <p data-bbox="345 674 1442 814">AT&amp;T's had numerous P3028 tags (corrective action tags) that were not corrected by their due date. An example is #AUT022319, a priority 1 tag, which is to be corrected or temporarily remediated and reclassified to a lower within 72 hours but it took 36 days to correct the violation.</p>	

3.	<b>Location:</b>	541 Curtola Parkway, Vallejo
	<b>Previous Visit by AT&amp;T:</b>	3/6/2013
	<b>Date Visited by CPUC:</b>	2/28/2013
	<p data-bbox="344 388 727 424"><b>Explanation of Violation(s):</b></p> <p data-bbox="344 445 691 480"><b><u>Abandoned Service Drop</u></b></p> <p data-bbox="344 518 1000 554">GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p data-bbox="472 590 1446 699"><i>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...</i></p> <p data-bbox="344 737 1409 808">The pole had an abandoned service drop. This violation was not documented when AT&amp;T last inspected the pole.</p> <p data-bbox="344 846 592 882"><b><u>Broken Guy Wire</u></b></p> <p data-bbox="344 919 766 955">GO 95, Rule 86. 2, states in part:</p> <p data-bbox="469 993 1463 1102"><i>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.</i></p> <p data-bbox="344 1140 1442 1211">The pole had a broken guy wire. This violation was not documented when AT&amp;T last inspected the pole.</p>	

<b>4.</b>	<b>Location:</b>	1589 Rayburn Court, Fairfield
	<b>Previous Visit by AT&amp;T:</b>	3/12/2013
	<b>Date Visited by CPUC:</b>	4/9/2013
<b>Explanation of Violation(s):</b>		
<b><u>Clearance Between Wires</u></b>		
<p>GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind.</i></p> <p>The pole had AT&amp;T's service drop touching a service drop of a different CIP. This violation was not documented when AT&amp;T inspected the pole.</p>		

<b>5.</b>	<b>Location:</b>	325, 331 and 337 East Wyoming Street, Fairfield
	<b>Previous Visit by AT&amp;T:</b>	3/15/2013
	<b>Date Visited by CPUC:</b>	4/9/2013
<b>Explanation of Violation(s):</b>		
<b><u>Low Mainline Cable and Service Drops</u></b>		
<p>GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., states in part:</p> <p style="text-align: center;"><i>Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.</i></p> <p>The poles had AT&amp;T's mainline and service drops with vertical clearances that were low. This violation was not documented when AT&amp;T inspected the pole.</p>		

6.	<b>Location:</b>	323 Texas Street, Fairfield
<b>Previous Visit by AT&amp;T:</b>		1/18/2012
<b>Date Visited by CPUC:</b>		4/9/2013
<b>Explanation of Violation(s):</b>		
<p data-bbox="349 451 625 483"><b><u>Missing Guy Guard</u></b></p> <p data-bbox="349 514 1015 556">GO 95, Rule 86.9, Guy Marker (Guy Guard), states:</p> <p data-bbox="470 588 1485 735"><i>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.</i></p> <p data-bbox="349 766 1364 850">The pole had an AT&amp;T anchor guy without a guy guard. This violation was not documented when AT&amp;T inspected the pole.</p> <p data-bbox="349 882 592 913"><b><u>Abandoned Drop</u></b></p> <p data-bbox="349 955 917 997">GO 95, Rule 31.6, Abandoned Lines, states:</p> <p data-bbox="470 1029 1469 1207"><i>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.</i></p> <p data-bbox="349 1249 1421 1323">The pole had an abandoned AT&amp;T service drop. This violation was not documented when AT&amp;T inspected the pole.</p>		

<b>7.</b>	<b>Location:</b>	1925 San Clemente Street, Fairfield
	<b>Previous Visit by AT&amp;T:</b>	4/30/12
	<b>Date Visited by CPUC:</b>	4/9/2013
<b>Explanation of Violation(s):</b>		
<b><u>Low Mainline Cable</u></b>		
<p>GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., states in part:</p> <p style="text-align: center;"><i>Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.</i></p> <p>At this location, an AT&amp;T mainline cable was low (measure at 7'7"). This violation was not documented when AT&amp;T inspected the pole. Also, this was a closed tag location and supposedly had been corrected but the violation was still present. Please explain why the violation was not corrected?</p>		

<b>8.</b>	<b>Location:</b>	341 Cottonwood Street, Vallejo
	<b>Previous Visit by AT&amp;T:</b>	9/28/2010
	<b>Date Visited by CPUC:</b>	4/9/2013
<b>Explanation of Violation(s):</b>		
<b><u>Slack Guy Wire</u></b>		
<p>GO 95, Rule 86. 2, states in part:</p> <p style="text-align: center;"><i>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.</i></p> <p>The pole had a slack guy wire. This violation was not documented when AT&amp;T last inspected the pole. Also, please provide me with when this location was last visited before 4/9/2013.</p>		

<b>9.</b>	<b>Location:</b>	689 East "N" Street, Benicia
	<b>Previous Visit by AT&amp;T:</b>	3/27/2013
	<b>Date Visited by CPUC:</b>	4/9/2013
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Clearance Between Communication Conductor and Electric Down Guy Wire</u></b>		
<p>GO 95, Rule 38, Table 2, Case 19C, requires that:</p> <p style="text-align: center;"><i>Guys and span wires passing communication conductors (including service drops) supported on the same pole must maintain a three (3) inch radial separation.</i></p> <p>The pole had a communication conductor in contact with a guy wire. This violation was not documented when AT&amp;T last inspected the pole.</p>		

<b>10.</b>	<b>Location:</b>	510 East "N" Street, Benicia
	<b>Previous Visit by AT&amp;T:</b>	3/27/2013
	<b>Date Visited by CPUC:</b>	4/9/2013
<b>Explanation of Violation(s):</b>		
<b><u>Clearance Between Wires</u></b>		
<p>GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, states in part:</p> <p style="text-align: center;"><i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind.</i></p> <p>The pole had AT&amp;T's service drop touching a service drop of a different CIP. This violation was not documented when AT&amp;T inspected the pole.</p>		



## **Recommendation**

### **Preservation of Records Issue**

GO 95, Rule 18-A1b, Resolution of Safety Hazard and General Order 95 Nonconformances, states:

*Upon completion of the corrective action, the company's records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years and shall be made available to Commission staff upon 30 days notice.*

AT&T staff stated that some records may be only retained for five (5) years in the electronic system.