STATE OF CALIFORNIA
EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

February 2, 2015

Ms. Lorraine A. Kocen
State Government Affairs
Verizon Wireless
2535 W. Hillcrest Drive
Newbury, CA 91320

CA2014-011

**SUBJECT:** Audit of Verizon Wireless – Orange County

Dear Ms. Kocen:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Koko Tomassian of my staff conducted a Communication Infrastructure Provider (CIP) audit of Verizon Wireless – Orange County from November 17 to November 21, 2014. The audit included a review of Verizon Wireless' records and field inspections of Verizon Wireless' facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than March 2, 2015, by electronic or hard copy, of all corrective measures taken by Verizon Wireless to remedy and prevent such violations.

If you have any questions, you can contact Koko Tomassian at (213) 576-7099 or koko.tomassian@cpuc.ca.gov.

Sincerely,

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Audit Findings

CC: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC

## AUDIT FINDINGS

The following violations were not documented and/or addressed by Verizon Wireless during its last detailed inspection as required by General Order 95:

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| **1.** | **Structure No.:** | NT709-H7-02 |
| | **Previous Verizon Wireless Visit Details:** | May 23, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |
| | **Explanation of Violation(s):** | |
| | **Unracked Underground Cables**<br><br>GO 128, Rule 17.1, Design, Construction, and Maintenance, States in part:<br><br>*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.*<br><br>The handhole structure housed underground cables which were not racked. | |

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| **2.** | **Structure No.:** | 4755285E |
| | **Previous Verizon Wireless Visit Details:** | May 23, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |
| | **Explanation of Violation(s):** | |
| | **Damaged Guy Guard**<br><br>GO 95, Rule 86.9 Guy Marker (Guy Guard), States in part:<br><br>*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.*<br><br>The pole supported a down guy wire which was not guarded with a substantial marker of suitable material. | |

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| **3.** | **Structure No.:** | 1031930H |
| | **Previous Verizon Wireless Visit Details:** | May 23, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |
| | **Explanation of Violation(s):** | |
| | **<u>Damaged Visibility Strip</u>**<br><br>GO 95, Rule 31.1, Design, Construction and Maintenance, States in part:<br><br>*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.*<br><br>The pole had a damaged visibility strip. | |

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| **4.** | **Structure No.:** | 4326902E |
| | **Previous Verizon Wireless Visit Details:** | May 29, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |
| | **Explanation of Violation(s):** | |
| | **<u>Communication Cables not Marked</u>**<br><br>GO 95, Rule 91.5, Marking, States in part:<br><br>*Each communication cable and conductor as defined by Rules 20.4, 20.6(A), 20.9, 84.1, 87.4(C), and 89.1 that is attached to a joint-use pole shall be marked as to ownership... This marking requirement applies only to (A) new construction, (B) reconstruction of facilities, and (C) existing aerial communication cables and conductors that a technician works on when the technician ascends the joint-use pole for regular maintenance.*<br><br>The Verizon Wireless cables attached to this pole were not marked to indicate ownership. | |

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| **5.** | **Location:** | 4326907E |
| | **Previous Verizon Wireless Visit Details:** | May 29, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |
| | **Explanation of Violation(s):** | |
| | **<u>Broken Down Guy Wire</u>**<br><br>GO 95, Rule 86.2, Overhead Guys, Anchor Guys and Span Wires, States in part:<br><br>*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.*<br><br>The pole had a broken down guy wire. | |

| 6. | **Structure No.:** | 4326905E |
|---|---|---|
| | **Previous Verizon Wireless Visit Details:** | May 29, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |

**Explanation of Violation(s):**

**Loose Guy Wire**

GO 95, Rule 86.2, Overhead Guys, Anchor Guys and Span Wires, States in part:

> *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.*

The pole had a slack down guy wire.

**Down Guy Wire Not Sectionalized**

GO 95, Rule 86.6-B2, Guys in Proximity, States in part:

> *Every overhead or anchor guy, any portion of which is in proximity to a wood pole and supply conductors of 0 – 33,500 volts (see Appendix G, Figures 45, 48, and 49) shall be sectionalized by means of insulators as specified in Rule 86.7-A2 or Rule 86.7-B, and no portion in proximity to such supply conductors shall be grounded...*

The down guy wire in proximity to supply conductors was missing an insulator.

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| **7.** | **Structure No.:** | 4319056E |
| | **Previous Verizon Wireless Visit Details:** | May 29, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |
| | **Explanation of Violation(s):** | |
| | **<u>Insufficient Clearance Between Communication Cables of Different Ownership</u>**<br><br>GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.<br><br>The vertical clearance between a Verizon Wireless cable and other CIP cable(s) were less than 12 inches at midspan. | |

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| **8.** | **Structure No.:** | 4319102E |
| | **Previous Verizon Wireless Visit Details:** | May 29, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |
| | **Explanation of Violation(s):** | |
| | **<u>Insufficient Clearance Between Communication Cables of Different Ownership</u>**<br><br>GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.<br><br>The vertical clearance between a Verizon Wireless cable and other CIP cable(s) were less than 12 inches at midspan. | |

| 9. | **Structure No.:** | 4327419E |
|---|---|---|
| | **Previous Verizon Wireless Visit Details:** | May 29, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |
| | **Explanation of Violation(s):** | |
| | **Insufficient Clearance Between Communication Cables of Different Ownership**<br><br>GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.<br><br>The vertical clearance between a Verizon Wireless slack loop and other CIP cable(s) were less than 12 inches. | |

| 10. | **Structure No.:** | 4327418E |
|---|---|---|
| | **Previous Verizon Wireless Visit Details:** | May 29, 2014 |
| | **Date of CPUC Inspection:** | November 18, 2014 |
| | **Explanation of Violation(s):** | |
| | **Insufficient Clearance Between Communication Cables of Different Ownership**<br><br>GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.<br><br>The vertical clearance between a Verizon Wireless cable and other CIP cable(s) were less than 12 inches at midspan. Additionally, the Verizon Wireless slack loop at this pole was in contact with CIP cable(s) of different ownership.<br><br>**Missing Guy Guard**<br><br>GO 95, Rule 86.9, Guy Marker (Guy Guard), States in part:<br><br>*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...*<br><br>The pole supported a down guy wire which was not guarded with a substantial marker of suitable material. | |

| 11. | **Structure No.:** | 1614457E |
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| | **Previous Verizon Wireless Visit Details:** | August 14, 2014 |
| | **Date of CPUC Inspection:** | November 19, 2014 |
| | **Explanation of Violation(s):** | |
| | **Low Pole Step**<br>GO 95, Rule 91.3-B, Location of Steps, States in part:<br>*The lowest step shall be not less than 7 feet 6 inches from the ground line...*<br>The lowest pole step on the pole did not have sufficient clearance from the ground line. | |

| 12. | **Structure No.:** | 1614455E |
|---|---|---|
| | **Previous Verizon Wireless Visit Details:** | August 14, 2014 |
| | **Date of CPUC Inspection:** | November 19, 2014 |
| | **Explanation of Violation(s):** | |
| | **Third Party Safety Hazard – Broken Lashing Wire**<br>GO 95, Rule 18-B, Notification of Safety Hazards, States:<br>*If a company, while performing inspections of its facilities, discovers a safety hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.*<br>A lashing wire of another CIP was broken. Verizon Wireless did not notify the CIP of this safety hazard when it last visited the pole. | |

| 13. | **Structure No.:** | 1478116E |
|---|---|---|
| | **Previous Verizon Wireless Visit Details:** | July 31, 2014 |
| | **Date of CPUC Inspection:** | November 19, 2014 |
| | **Explanation of Violation(s):** | |
| | **Broken Lashing Wire**<br><br>GO 95, Rule 31.1, Design, Construction and Maintenance, States in part:<br><br>*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.*<br><br>The pole had a broken lashing wire. | |

| 14. | **Structure No.:** | 1478119E |
|---|---|---|
| | **Previous Verizon Wireless Visit Details:** | July 31, 2014 |
| | **Date of CPUC Inspection:** | November 19, 2014 |
| | **Explanation of Violation(s):** | |
| | **Broken Lashing Wire**<br><br>GO 95, Rule 31.1, Design, Construction and Maintenance, States in part:<br><br>*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.*<br><br>The pole had a broken lashing wire. | |

| 15. | **Structure No.:** | 1478120E |
|---|---|---|
| | **Previous Verizon Wireless Visit Details:** | August 1, 2013 |
| | **Date of CPUC Inspection:** | November 19, 2014 |
| | **Explanation of Violation(s):** | |
| | **Low Pole Step**<br>GO 95, Rule 91.3-B, Location of Steps, States in part:<br>*The lowest step shall be not less than 7 feet 6 inches from the ground line...*<br>The lowest pole step on the pole did not have sufficient clearance from the ground line. | |

| 16. | **Structure No.:** | P128426 |
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| | **Previous Verizon Wireless Visit Details:** | June 20, 2014 |
| | **Date of CPUC Inspection:** | November 20, 2014 |
| | **Explanation of Violation(s):** | |
| | **Insufficient Clearance Between Communication Cables of Different Ownership**<br>GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.<br>The vertical clearance between a Verizon Wireless cable and other CIP cable(s) were less than 12 inches at midspan. | |

| 17. | **Structure No.:** | 1027563H |
|---|---|---|
| | **Previous Verizon Wireless Visit Details:** | June 20, 2014 |
| | **Date of CPUC Inspection:** | November 20, 2014 |
| | **Explanation of Violation(s):** | |
| | **Insufficient Clearance Between Communication Cables of Different Ownership**<br><br>GO 95, Rule 84.4-C, Clearances Between Conductors, requires a minimum 12 inch vertical separation between communication cables of different ownership.<br><br>The vertical clearance between a Verizon Wireless cable and other CIP cable(s) were less than 12 inches at midspan. | |