

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 22, 2016

CA2015-012

Mr. John Gutierrez
Senior Director – Government Affairs
Comcast Cable
3055 Comcast Place
Livermore, CA 94551

SUBJECT: Audit of Comcast Cable – West Bay Region

Dear Mr. Gutierrez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Raymond Cho of my staff conducted a Communication Infrastructure Provider (CIP) audit of Comcast Cable West Bay Region from October 19 to October 21, 2015. The audit included a review of Comcast's records and field inspections of Comcast facilities in San Francisco County.

During the audit, we identified violations of one or more General Orders. A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than February 23, 2016 by electronic or hard copy, of all corrective measures taken by Comcast Cable to remedy and prevent such violations. Also, we have attached a spreadsheet of completed work orders in Comcast West Bay Region. Please provide us by February 23, 2016, a short description of the work order, its priority level, and scheduled completion date.

If you have any questions concerning this audit please contact Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosure: Audit Findings
 Work Orders

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

AUDIT FINDINGS

I. Records Review

During the audit my staff reviewed the following records:

- a. Work Orders from 2010 through October 16, 2015
- b. Inspection Drive Out Maps
- c. Aerial Vault Plant Map and Network Visits Map
- d. Pole Loading completed for 2010 through October 16, 2015
- e. 3rd Party Notifications for 2010 through October 16, 2015
- f. Comcast 2015 Outside Plant Handbook
- g. Service Area Map for California

II. Field Inspection

The following are the facilities we inspected during the field inspection:

Date Visited by CPUC	Type of Structure	Approximate Address (in San Francisco)
10/19/2015	Underground Handhole	1425 Quint St.
10/19/2015	Underground Handhole	1733 Palou Ave.
10/19/2015	Underground Handhole	1717 Palou Ave.
10/19/2015	Underground Handhole	1818 Palou Ave.
10/19/2015	Underground Handhole	1871 Palou Ave.
10/19/2015	Underground Handhole	1879 Palou Ave.
10/19/2015	Underground Handhole	419 Moscow St.
10/19/2015	Underground Handhole	421 Moscow St.
10/19/2015	Underground Handhole	434 Moscow St.
10/19/2015	Underground Handhole	442 Moscow St.
10/20/2015	Underground Handhole	2369 Ocean Ave.
10/21/2015	Underground Handhole	2395 Ocean Ave.
10/21/2015	Overhead Facilities	346 Ashton Ave.
10/21/2015	Overhead Facilities	214 Ashton Ave.
10/21/2015	Overhead Facilities	210 Ashton Ave.
10/21/2015	Overhead Facilities	1806 28th Ave.
10/21/2015	Overhead Facilities	1817 28th Ave.
10/21/2015	Overhead Facilities	1821 28th Ave.
10/21/2015	Overhead Facilities	1836 28th Ave.
10/21/2015	Overhead Facilities	1841 28th Ave.
10/21/2015	Overhead Facilities	1848 28th Ave.
10/21/2015	Overhead Facilities	1227 37th Ave.

Date Visited by CPUC	Type of Structure	Approximate Address (in San Francisco)
10/21/2015	Overhead Facilities	1325 37th Ave.
10/21/2015	Overhead Facilities	1405 37th Ave.
10/21/2015	Overhead Facilities	1483 37th Ave.
10/21/2015	Overhead Facilities	1491 37th Ave.
10/21/2015	Overhead Facilities	131 27th Ave.
10/21/2015	Overhead Facilities	144 27th Ave.
10/21/2015	Overhead Facilities	156 27th Ave.
10/21/2015	Overhead Facilities	165 27th Ave.
10/21/2015	Overhead Facilities	166 27th Ave.
10/21/2015	Overhead Facilities	190 27th Ave.
10/21/2015	Overhead Facilities	210 27th Ave.
10/21/2015	Overhead Facilities	211 27th Ave.
10/21/2015	Overhead Facilities	221 27th Ave.
10/21/2015	Overhead Facilities	222 27th Ave.
10/21/2015	Overhead Facilities	230 27th Ave.
10/21/2015	Overhead Facilities	243 27th Ave.
10/21/2015	Overhead Facilities	246 27th Ave.
10/21/2015	Overhead Facilities	247 27th Ave.
10/21/2015	Overhead Facilities	248 27th Ave.
10/21/2015	Overhead Facilities	251 27th Ave.
10/21/2015	Overhead Facilities	227 27th Ave.
10/22/2015	Overhead Facilities	915 Minnesota St.
10/22/2015	Overhead Facilities	917 Minnesota St.
10/22/2015	Overhead Facilities	922 Minnesota St.
10/22/2015	Overhead Facilities	923 Minnesota St.
10/22/2015	Overhead Facilities	934 Minnesota St.
10/22/2015	Overhead Facilities	966 Minnesota St.
10/22/2015	Overhead Facilities	3600 20th St.
10/22/2015	Overhead Facilities	3605 20th St.
10/22/2015	Overhead Facilities	3651 20th St.
10/22/2015	Overhead Facilities	3653 20th St.
10/22/2015	Overhead Facilities	3656 20th St.
10/22/2015	Overhead Facilities	3660 20th St.
10/22/2015	Overhead Facilities	3666 20th St.
10/22/2015	Overhead Facilities	3643 20th St.
10/22/2015	Overhead Facilities	3635 20th St.
10/22/2015	Overhead Facilities	3686 20th St.
10/22/2015	Overhead Facilities	3690 20th St.
10/22/2015	Underground Handhole	3101 Mission St.

Date Visited by CPUC	Type of Structure	Approximate Address (in San Francisco)
10/22/2015	Underground Handhole	3135 Mission St.
10/22/2015	Underground Handhole	3137 Mission St.
10/22/2015	Underground Handhole	3139 Mission St.
10/22/2015	Underground Handhole	3143 Mission St.
10/22/2015	Underground Handhole	3145 Mission St.
10/22/2015	Underground Handhole	3150 Mission St.
10/22/2015	Underground Handhole	3158 Mission St.
10/22/2015	Underground Handhole	3168 Mission St.
10/22/2015	Underground Handhole	3175 Mission St.
10/22/2015	Overhead Facilities	3177 Mission St.
10/22/2015	Underground Handhole	3184 Mission St.
10/22/2015	Underground Handhole	3189 Mission St.
10/22/2015	Underground Handhole	3191 Mission St.
10/22/2015	Overhead Facilities	704 Bay St.
10/22/2015	Overhead Facilities	712 Bay St.
10/22/2015	Underground Handhole	716 Bay St.
10/22/2015	Overhead Facilities	717 Bay St.
10/22/2015	Underground Handhole	718 Bay St.
10/22/2015	Overhead Facilities	731 Bay St.
10/22/2015	Overhead Facilities	777 Bay St.
10/22/2015	Underground Handhole	784 Bay St.
10/22/2015	Overhead Facilities	785 Bay St.
10/22/2015	Underground Handhole	792 Bay St.
10/22/2015	Underground Handhole	818 Bay St.
10/22/2015	Overhead Facilities	822 Bay St.
10/22/2015	Overhead Facilities	848 Bay St.
10/22/2015	Underground Handhole	894 22nd St.

III. Field Inspection - Violations

We observed the following violations during the field inspection. These violations were not documented and/or addressed by Comcast during its last inspections:

GO 95, Rule 38, Table 2, case 16C, requires service drops to have a minimum 3 inch clearance from other communication lines.

Comcast service drops at the following locations were less than 3 inches from other communication lines:

- 419 Moscow St.
- 421 Moscow St.
- 442 Moscow St.
- 1821 28th St.
- 1491 37th Ave.
- 227 27th Ave.
- 894 22nd St.
- 3643 20th St.
- 3635 20th St.
- 3690 20th St.
- 3146 Mission St.
- 704 Bay St.

GO 95, Rule 84.8D(4) – Clearances between Conductors, requires service drops to have a minimum 12 inches of radial clearance from electric supply service drops within 15 feet of attachment to a building.

Comcast service drops at the following locations had less than 12 inches separation from electric supply service drops:

- 131 27th Ave.
- 156 27th Ave.
- 166 27th Ave.
- 966 Minnesota St.
- 3653 20th St.

GO 95, Rule 37 – Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., requires the clearance of communication conductors to be at least 18 feet above ground at the center of a public thoroughfare.

The overhead clearance of a Comcast service drop at the center of 346 Ashton Avenue was 17 feet.

GO 128, Rule 17.1 – Design, Construction, and Maintenance, states in part:

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.

Comcast handhole covers at the following locations were damaged and could not be lifted by hooks:

- 3168 Mission St.
- 3184 Mission St.
- 3189 Mission St.

A Comcast wall mounted box at 731 Bay St. did not have a cover.