

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 15, 2016

CA2016-001

Danielle Wade
Vice President/General Manager
Bright House Networks
4450 California Ave, Suite A
Bakersfield, CA 93309

Subject: Audit of Bright House Networks' Bakersfield Division

Dear Ms. Wade:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Raymond Cho of my staff conducted a Communication Infrastructure Provider (CIP) audit of Bright House Networks' Bakersfield Division from March 7, 2016, to March 9, 2016. The audit included a review of Bright House's maintenance records and field inspection of the Bakersfield Division's 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 May 16, 2016, by electronic or hard copy, of all corrective measures taken by Bright House Networks to remedy and prevent such violations.

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

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:

- 2016 cable signal leak inspection map.
- Specifications for Aerial and Underground service.
- Bright House procedure for Inspections during the course of normal duties.
- Completed work orders from December 20, 2012 through February, 23, 2016.
- New construction records for the following projects: 2502 Ming Ave., Shellabarger Extension, Elzworth St. and Langley Rd., 4000 Alken St., 700 Truxtun Ave., and 217 Daniels Ln.

II. Records Review – Violations

GO 95, Rule 18-A2a, states in part:

All companies shall establish an auditable maintenance program for their facilities and lines. All companies must include a timeline for corrective actions to be taken following the identification of a Safety Hazard or nonconformances with General Order 95 on the company's facilities. The auditable maintenance program shall prioritize corrective actions consistent with the priority levels set forth below and based on the following factors, as appropriate...

Bright House's maintenance program did not include corrective action dates and did not have any provision to prioritize corrective actions as required by this rule.

GO 95, Rule 80.1-4, Record Keeping, states:

Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a).

Bright House's patrol or inspection program does not include auditable records that identify the date of inspections, results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and personnel who performed each corrective action.

III. Field Inspection

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

Structure Number	Type of Structure	Location
22739 Westwood Ave.	Pole	Tehachapi
21431 Westwood Ave.	Pole	Tehachapi
20021 Valley Blvd. - behind	Pole	Tehachapi
811 West Valley Blvd.	2x Distribution Pedestals	Tehachapi
Tehachapi Rd.	Pole Line	Tehachapi
20824 Brentwood Dr.	Distribution Pedestal	Tehachapi
985 McElroy St.	Wall Mounted Box	Arvin
125 McElroy St.	Low Profile Distribution Housing	Arvin
119 Richards St.	Low Profile Distribution Housing	Arvin
10429 Habecker Rd.	Pole	Lamont
Golf Course Rd.	Pole Line	Taft
28162 Cosworth Ave.	Low Profile Distribution Housing	Dustin Acres
212 Hillard St.	Distribution Pedestal	Taft
Church St. and Sunset Ln.	Low Profile Distribution Housing	Taft
323 S. Tenth St.	Wall Mounted Box	Taft
Taft Highway	Pole Line	Taft
101 E. Terrace Way	Pole	Bakersfield
516 S. Union Ave.	Distribution Pedestal	Bakersfield
100 Daniels Ln.	Distribution Pedestal	Bakersfield
109 Daniels Ln.	Distribution Pedestal	Bakersfield
113 Daniels Ln.	Distribution Pedestal	Bakersfield
217 Daniels Ln.	Distribution Pedestal	Bakersfield
313 Daniels Ln.	Distribution Pedestal	Bakersfield
4101 Alken St.	2x Distribution Pedestals	Bakersfield
4100 Alken St.	2x Distribution Pedestals	Bakersfield
4001 Alken St.	Distribution Pedestal	Bakersfield
4000 Alken St.	2x Distribution Pedestals	Bakersfield
3960 Alken St.	Distribution Pedestal	Bakersfield
3937 Alken St.	Distribution Pedestal	Bakersfield
3930 Alken St.	Distribution Pedestal	Bakersfield
6940 Meany Ave.	Distribution Pedestal	Bakersfield
7000 Meany Ave.	Distribution Pedestal	Bakersfield
1516 Castro Ln.	Pole	Bakersfield
1500 Castro Ln.	2x Poles	Bakersfield
2715 Talisman Dr.	2x Poles	Bakersfield

2613 Talisman Dr.	Pole	Bakersfield
2611 Talisman Dr.	Pole	Bakersfield
2720 Ming Ave.	2x Poles	Bakersfield
2708 Ming Ave.	Pole	Bakersfield
2626 Ming Ave.	Pole	Bakersfield
2620 Ming Ave.	2x Poles	Bakersfield
2502 Ming Ave.	Pole	Bakersfield
9301 Langley Rd.	2x Poles	Bakersfield
1801 Elworth St.	Pole	Bakersfield
1810 Elworth St.	2x Poles	Bakersfield
1723 Elworth St.	Pole	Bakersfield
1715 Elworth St.	Pole	Bakersfield
1649 Elworth St.	Pole	Bakersfield
9316 Shellabarger Rd.	3x Poles	Bakersfield
9401 Shellabarger Rd.	Pole	Bakersfield
9427 Shellabarger Rd.	Pole	Bakersfield
9430 Shellabarger Rd.	Distribution Pedestal	Bakersfield
1648 Shellabarger Rd.	Underground Hand Hole	Bakersfield
1711 Shellabarger Rd.	Distribution Pedestal	Bakersfield
1702 Shellabarger Rd.	Distribution Pedestal	Bakersfield
1730 Shellabarger Rd.	Distribution Pedestal	Bakersfield
1832 Shellabarger Rd.	Distribution Pedestal	Bakersfield
1858 Shellabarger Rd.	Distribution Pedestal	Bakersfield
1832 Shellabarger Rd.	Pole	Bakersfield
1000 18 th St.	Pole	Bakersfield
931 18 th St.	Pole	Bakersfield
915 18 th St.	Pole	Bakersfield
903 18 th St.	Pole	Bakersfield
821 18 th St.	Pole	Bakersfield
819 18 th St.	Pole	Bakersfield
801 18 th St.	2x Poles	Bakersfield
720 17 th St.	2x Poles	Bakersfield
730 17 th St.	3x Poles	Bakersfield

IV. Field Inspection – Undocumented Violations List

We observed the following violations during the field inspection. None of the violations were documented and/or addressed by Bright House Networks during its last inspections:

GO 95, Rule 31.1, 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.

GO 95, Rule 84.6-B, Ground Wires, states in part:

Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.

The following Bright House ground wires were not suitably covered:

- 22739 Westwood Ave.
- 1619 Elzworth St.
- Behind 901 18th St.
- Behind 819 18th St.

GO 95, Rule 86.5, Guy Marker (Guy Guard), states in part:

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.

Poles at the following locations had a missing or damaged guy guard:

- Golf Course Rd. and Highway 119
- Union Ave. and Terrace Way

GO 95, Rule 84.7-A, Climbing Space, states in part:

Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c , 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

Poles at the following locations had a Bright House conductor impeding the climbing space:

- Corner of Castro Ln. and Talisman Dr.
- Behind 819 18th St.

GO 95, Rule 38, case 8-F, requires that communication conductors shall be no less than 72 inches from primary supply cables depending on the primary voltage.

A Bright House conductor on a pole behind 2620 Ming Ave. was approximately 24 inches away from an exposed primary supply riser.

GO 95, Rule 38, case 16-C, requires that the radial clearance between communication conductors of different companies to be no less than 3 inches.

The following conditions were found on two poles behind 721 18th St:

- A Bright House riser was in contact with an AT&T conductor.
- A Bright House service drop was in contact with an AT&T service drop.

GO 95, Rule 84.6-D, Risers, states in part:

Vertical runs shall be treated as risers (see Rule 87.7-D) where within a distance of 8 feet from the ground line.

Poles at the following locations had vertically run conductors that were not suitably protected from ground level to 8 feet above ground:

- 1759 Elzworth St.
- 1715 Elzworth St.
- 1637 Elzworth St.
- Behind 721 18th St.

GO 95, Rule 91.3-A1, Poles with Vertical Runs or Risers, states in part:

All jointly used poles which support supply conductors shall be provided with pole steps if vertical runs or risers are attached to the surface of such poles, unless the conditions described in the following subparagraphs (a) , (b) or (c) are met..

A pole at 9401 Shellabarger Rd. was not stepped.

GO 95, Rule 38, Table 2, Column C, Case 18, requires the minimum radial separation between guys and communications conductors to be 3 inches.

The pole behind 721 18th St. supported a Bright House conductor was in contact with a down guy wire.

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.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.

The following structures were damaged or inaccessible:

- Employees were unable to access the distribution housing at 119 Richards St.
- The locking mechanism for a distribution pedestal at 4100 Alken St. was damaged.
- The locking mechanism for a distribution pedestal at 3930 Alken St. was damaged.
- The distribution pedestal at 9331 Langley Rd. was damaged.

The following pedestals did not have a ground wire installed for an amplifier or at the end of the circuit:

- Pedestal at 9430 Shellabarger Rd.
- Pedestal at 1711 Shellabarger Rd.
- Pedestal at 1730 Shellabarger Rd.
- Pedestal at 1832 Shellabarger Rd.

GO 128, Rule 34.3-C, Locking, states:

Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.

The following Bright House compartments and enclosures were not locked:

- Two pedestals located at 811 West Valley Blvd.
- A wall mounted box at 985 McElroy St.