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January 2, 2026

Via email: fadi.daye@cpuc.ca.gov
Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Response of Race Communications of Corrective Actions relating
To Kern County Area Audit – **Confidential and Public Versions Attached**

Dear Mr. Daye:

Race Telecommunications, LLC (dba "Race Communications") received the December 5, 2025, CPUC SED letter relating to the Audit of Race Communications Kern County Area. Race promptly performed corrective actions to remedy any indicated violations and hereby provides an attached Excel Sheet indicating all corrective actions taken and the date as requested.

Race invokes confidentiality over Columns B (Structure ID number) and D (Location) in the attached Excel spreadsheet and attaches a declaration of a company officer pursuant to the requirements of General Order 66-D. Column B lists customer addresses that were used to refer to an underground Race facility in front of that house address, while Column D lists the city related to that same facility. The locations and identities of Race's customers is a highly confidential piece of information due to competitive reasons, in addition to the protection of Race's facilities as a matter of national security. We are attaching both a Confidential and Public (redacted) copy of the responsive Excel.

If you have any questions about this response, please notify me, at carlos@race.com.

Sincerely yours,

/s/ Carlos Alcantar

Carlos Alcantar, CTO
Race Communications

Attachments: Confidential and Public (Redacted) Responsive Excel spreadsheets
Declaration of Officer re Confidentiality

cc: Sultan Tipu at sultan.tipu@cpuc.ca.gov
Domenic Pacini, VP Construction and OSP, Race Communications

1 **DECLARATION OF CARLOS ALCANTAR IN SUPPORT OF**
2 **REQUEST FOR CONFIDENTIAL TREATMENT OF DATA**
3 **IN RESPONSE TO CPUC SED AUDIT OF RACE COMMUNICATIONS**
4 **KERN COUNTY AREA**
5

6
7 I, Carlos Alcantar, declare and state as follows:

- 8 1. I am the Chief Technology Officer of Race Telecommunications, LLC (“Race” or
9 “the Company”), a provider of Internet and voice services in California. I have
10 been employed by Race since January 2000.
- 11 2. I am over eighteen (18) years of age. I have personal knowledge of the truth of
12 all matters set forth herein, except those stated on information and belief, and as
13 to those matters, I believe them to be true. I make this declaration based upon
14 my professional experience, personal knowledge, and information and belief.
- 15 3. I make this declaration pursuant to General Order No. 66-D, adopted pursuant to
16 the California Public Utilities Commission’s (“CPUC”) Decision 17-09-023, issued
17 October 2, 2017.
- 18 4. Concurrently with this Declaration, Race is submitting data responsive to the
19 results of an Audit of Race Communication’s facilities located in the Kern County
20 area, conducted on October 20-24, 2025, to the Electric Safety and Reliability
21 Branch (“ESRB”) of the Safety and Enforcement Division of the California Public
22 Utilities Commission. On December 5, 2025, the Company received the audit
23 results from Mr. Fadi Daye of the ESRB. In it, the ESRB listed alleged violations
24 relating to particular facilities of the Company in Kern County, and requested all
25 corrective actions be taken by the Company promptly to remedy the violations.
26 In the attached response to ESRB, Race is reporting to the ESRB that all
27 corrective measures were taken, and the Company is attaching data in an Excel
28 spreadsheet to state the corrective action taken and the date of such action as to

1 each alleged violation. Race is providing both a confidential and a public version
2 with confidential information redacted.

3 5. Race Communications is designating two columns of information in the Excel
4 spreadsheet as confidential. Race invokes confidentiality over Column B
5 (Structure ID number) and Column D (Location) in the confidential Excel
6 spreadsheet. Column B lists customer addresses that were used to refer to an
7 underground Race facility in front of that house address, while Column D lists the
8 city related to that same facility. The address and locations of Race's customers
9 is a highly confidential piece of information for competitive reasons. If the
10 location (address) of Race's customers are revealed to the public, a competitor
11 would have access to sensitive, proprietary and non-public data of the Company
12 relating to its customer base. Race's methods, techniques, and processes for
13 subscriber data storage and reporting practices are the subject of efforts that are
14 reasonable under the circumstances to maintain their confidentiality. Race
15 stores its subscriber data on a private network drive protected by appropriate
16 computer security controls. They are stored on a secure software system,
17 access to which is limited to a subset of Race employees who have been
18 individually approved and use such information only to fulfill their job functions.
19 This customer data consists of trade secret information that is closely guarded by
20 Race from its competitors. Competitors (actual and potential) could obtain
21 economic value from the disclosure of this information. Thus, to release this
22 sensitive and proprietary pole information to the public may actively assist
23 competitors to the detriment of Race. As a basis of the privilege, we refer you to
24 trade secret protections, as defined in California Civil Code Section 3426.1, CA
25 Penal Code Section 499c, subdiv. (a)(9) and California Evidence Code Section
26
27
28

1061.

6. In addition, Race requires, as a condition of employment, that all new employees sign a confidentiality agreement. This agreement is put in place to protect Race's proprietary data and information from being disclosed by employees or former employees to outside parties. Race also requires all employees to sign an agreement as to the employee's obligations regarding technology use, and security and protection of Race's confidential and proprietary information.

7. Race also seeks to protect confidential data in Columns B and D because the location of its facilities is nonpublic, sensitive information for national security reasons. Pole, underground facility locations and address locations of Race's customers will provide information to bad actors about the size, density and location of Race's physical network. The location of Race's network is highly sensitive and confidential for national security reasons. As the basis of this privilege, we refer you to California Government Code Section 6254(e); and Section 6254(ab) critical infrastructure information being voluntarily submitted to Cal OES and national security interests.

8. I declare, under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on January 2, 2026, at South San Francisco, California.

Carlos Alcantar, CTO
Race Telecommunications LLC

No.	Structure ID Number	Type of Structure	Location
4		Pole	
5		Pole	
11		Pole	
13		Pole	
14		Pole	
15		Pole	
21		Pole	
22		Pole	
24		Pole	
27		Pole	
29		Pole	
30		Pole	
35		Pole	
36		Pole	
37		Pole	
46		Pole	
47		Pole	
48		Pole	
49		Pole	
50		Pole	
57		Pole	
82		Pole	
83		Pole	
90		Pole	
97		Pole	
105		Vault	
119		Vault	
128		Vault	

Alleged Violation
A Race Communications conductor was in contact with a third-party communications conductor at midspan.
A Race Communications conductor was in contact with a third-party communications conductor at midspan.
The lashing wire of Race Communications cables attached to pole was loose or broken.
A Race Communications conductor was in contact with a third-party communications conductor.
A Race Communications conductor was in contact with a third-party communications conductor.
The Race Communications cables were not secured to the pole.
A Race Communications conductor was in contact with a third-party communications conductor.
A Race Communications conductor was in contact with a third-party communications conductor.
The Race Communications service drop was not secured to the pole, and it was less than 3 inches from span wire and in contact with a third-party communications conductor attached to the same pole.
The Race Communications cables were not secured to the pole.
A Race Communications conductor was in contact with a third-party communications conductor.
A Race Communications conductor was too close or in contact with a third-party communications conductor.
A Race Communications conductor and a node box was in contact with a third-party communications conductor.
A Race Communications conductor was in contact with a third-party communications conductor.
A Race Communications conductor was in contact with a third-party communications conductor.
The Race Communications cables were not transferred to the new pole in place.
A Race Communications conductor was in contact with a third-party communications conductor at midspan. The guy wire attached to this pole also did not have a marker.
A Race Communications conductor was in contact with a third-party communications conductor at midspan.
A Race Communications splicer box was in contact with a third-party communications conductor.
Climbing space was obstructed by vegetation.
A Race Communications conductor was in contact with a third-party communications service drop.
The Race Communications down guy wires were loose and not taut.
The Race Communications cables were loose and not secured by tie wrap.
The Race Communications down guy wires were loose and not taut.
A Race Communications conductor was in contact with a third-party communications conductor.
Handhole in front of residence at listed address was filled with a large amount of dirt
Handhole in front of residence at listed address was filled with a large amount of dirt
Handhole in front of residence at listed address was filled with a large amount of dirt

Corrective Action Taken by Race
Race Communications raised the strand and fiber
Race Communications raised the strand and fiber
Race Communications fixed the broken lashing wire
Race Communications raised the strand and fiber
Race Communications raised the strand and fiber
Race Communications secured cables to the pole
Race Communications raised the strand and fiber
Race Communications raised the strand and fiber
Race Communications replaced mid-span clamp and secured the drop to pole
Race Communications secured cables to pole
Race Communications raised the strand and fiber
Race Communications raised the strand and fiber
Race Communications raised the strand and fiber
Race Communications raised the strand and fiber
Race Communications raised the strand and fiber
Race Communications transferred its fiber cables to the new pole.
Race Communications raised the strand and fiber and installed a guy guard. New marker (guy guard) was added to the guy wire.
Race Communications raised the strand and fiber
Race Communications raised the strand and fiber
Race Communications removed vegetation from the climbing space
Race Communications raised the strand and fiber
Race Communications tightened the guy wire.
Race Communications installed tie wraps on loose cables.
Race Communications tightened the guy wire
Race Communications raised the strand and fiber
Race Communications removed excess dirt from handhole.
Race Communications removed excess dirt from handhole.
Race Communications removed excess dirt from handhole.

[illegible]