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ATTACHMENT 1

PUBLIC REDACTED VERSION

CPUC Summary Report - Response to CIP Audit Report CA2026-1459

Race Communications North Sacramento Service Area

Date: September 17, 2026

To:

Charles Mee, Senior Utilities Engineer (Specialist)
Electric Safety and Reliability Branch, Safety and Enforcement Division
California Public Utilities Commission, 505 Van Ness Avenue
San Francisco, CA 94102-3298

Re Response to CIP Audit Report CA2026 1459 Race Communications North Sacramento Service Area

Dear Mr. Mee:

Race Telecommunications, LLC d/b/a Race Communications submits this response to the Communication Infrastructure Provider audit report for the North Sacramento service area, transmitted by ESRB on August 19, 2026. ESRB identified 75 field findings across 90 inspected locations, including third-party notification items, missing facility identification, visibility markings, guying, clearance conditions, ground wire protection, and vegetation management. As of our response date, Race has completed corrective action on all 75 field findings. Race organized this response to track the findings from the records review and field inspection in the audit report. Attachment A provides the location-level corrective action tracker for these findings.

Race provides this response to describe corrective actions taken or initiated, and preventive measures being executed. When a finding concerns facilities owned or controlled by another entity, Race provides documented notice to the responsible owner and retains the notice in its records. For Race-owned facilities, Race documents the corrective work in its maintenance records.

Records Review Findings

GO 95 Rule 18(A)(1) - Corrective Action Recordkeeping

ESRB Finding: Race provided third-party permit records but did not provide Race work-order records documenting corrective actions with sufficient detail.

Race Response: Race acknowledges that the records produced during the audit did not present the corrective work order history in the form ESRB requested.

Corrective Action: Race is associating audit-related corrective actions with work records for RCNS and confirming that the records identify the nature of the work, completion date, and the personnel or crew responsible.

Preventive Measure: Race will require these record fields before closing GO 95 corrective action records and will retain the records for the period required by GO 95 Rule 18.

GO 95 Rule 18(A)(2-5) - Third-Party Notification Process

ESRB Finding: Race did not issue formal written Safety Hazard Notifications to third parties during the audit period and acknowledges that it is required to establish a formal written third-party notification program to ensure compliance and proper communication.

Race Response: Race is implementing a formal written notification process for third parties concerning conditions affecting facilities owned by other entities, and is applying that process to the conditions identified by ESRB.

Corrective Action: Race is transmitting and validating documented notices related to third-party conditions identified by ESRB. Each notice record includes details such as the responsible owner, location, observed condition, notice date, and delivery method, so that each notice is traceable in Race's records.

Preventive Measure: Race will use a written third-party notification process for future observations involving other facility owners and will maintain records of notices and transmittals for the mandated retention period.

GO 95 Rule 18(B) - Auditable Maintenance and Inspection Program

ESRB Finding: Race did not provide formal patrol or detailed inspection records for RCNS and is required to update the status of its inspection schedule, inspection records, and corrective-action records.

Race Response: Race is implementing an auditable maintenance and inspection program for RCNS.

Corrective Action: Race is finalizing the inspection schedule, forms, inspector qualification criteria, and record workflow for RCNS inspections and related corrective actions. Race expects the inspection program, including the inspection schedule, forms, inspector qualification criteria, and record workflow described above, to be implemented by 12/31/2026.

Preventive Measure: Race will conduct RCNS inspections under the formal program and will not rely on attachment surveys or pre-construction walkthroughs as substitutes for GO 95 inspection records.

GO 95 Rule 18(B)(1)(a) - Deficiency Prioritization and Due Dates

ESRB Finding: Race did not provide records showing priority levels or corrective action due dates for deficiencies found through inspections.

Race Response: Race is adding priority level, HFTD tier, safety-hazard flag, and corrective-action due date fields to its deficiency records.

Corrective Action: Race is applying the prioritization framework to the audit findings and confirming the assigned priority and due date for each finding through qualified personnel review.

Preventive Measure: Race will require priority level and due date fields when deficiencies are logged, and will review those fields before closing corrective action records.

Field Inspection Findings

Attachment A contains one row for each field finding and identifies the cited rule, location, finding description, response category, corrective action, preventive measure, and status. It is included with this response and documents, in writing, the corrective work performed for each finding. The summary below addresses each rule category.

GO 95 Rule 18 - Third-Party Notifications and Facility Identification

ESRB Finding: ESRB identified 53 findings involving third-party notification items and missing facility identification.

Race Response: Race has separated these findings into third-party conditions and Race facility identification items.

Corrective Action: For third-party conditions, Race has transmitted notices to the responsible facility owner and recorded the notice date and delivery method in Attachment A. For Race facility identification items, Race has installed, replaced, or verified facility identification and documented the work record.

Preventive Measure: Race will use its third-party notification procedure and inspection checklist to identify and document future third-party conditions and facility identification issues.

GO 95 Rule 31.1 - Design, Construction, and Maintenance

ESRB Finding: ESRB identified 10 findings involving visibility markings, guying, splice case attachment, service drops, or similar maintenance conditions.

Race Response: Race has completed corrective action for the Rule 31.1 items as reflected in Attachment A.

Corrective Action: Race documented the corrective work in applicable work records, including the completion date and correction, as recorded in Attachment A.

Preventive Measure: Race will include visibility markings, guying, splice case attachment, service drop condition, and related closeout checks in inspection forms and post-construction review.

GO 95 Rule 35 - Vegetation Management

ESRB Finding: ESRB identified one finding involving vegetation strain on a guy wire.

Race Response: Race has addressed the vegetation condition reflected in Attachment A.

Corrective Action: Race documented the field review and corrective work in applicable work records.

Preventive Measure: Race will include vegetation contact, strain, and abrasion indicators in its inspection process and will refer conditions outside Race control through the third-party notification process.

GO 95 Rule 38 - Minimum Clearances

ESRB Finding: ESRB identified six findings involving guy wire, service span, or service drop clearance conditions.

Race Response: Race has completed the correction of the clearance items reflected in Attachment A.

Corrective Action: Race documented the method of correction and the resulting clearance in applicable work records and in Attachment A.

Preventive Measure: Race will include clearance verification for service drops, service spans, and guy wires in inspection forms and post-work closeout checks.

GO 95 Rule 54.6(B) - Ground Wires

ESRB Finding: ESRB identified two findings involving exposed ground wires.

Race Response: Race has completed the correction of the ground wire covering items reflected in Attachment A.

Corrective Action: Race repaired or replaced the ground wire covering and recorded the completion date and method of correction in applicable work records and in Attachment A.

Preventive Measure: Race will include ground-wire protection and covering conditions in inspection forms and construction closeout checks.

GO 95 Rule 54.6(I) - Attachment of Protective Covering

ESRB Finding: ESRB identified one finding involving an unattached riser protective covering.

Race Response: Race has completed the correction of the riser attachment item reflected in Attachment A.

Corrective Action: Race re-secured the protective covering and recorded the completion date and method of correction in applicable work records and in Attachment A.

Preventive Measure: Race will include riser and protective covering attachment in inspection forms and construction closeout checks.

GO 95 Rule 91.3(B) - Stepping

ESRB Finding: ESRB identified two instances of pole steps being lower than the required minimum height.

Race Response: Race has completed the correction of the pole step items reflected in Attachment A.

Corrective Action: Race removed or relocated the non-compliant steps and completion date in applicable work records and in Attachment A.

Preventive Measure: Race will include step placement in inspections and construction closeout, including measured height documented where corrective work is performed.

Race appreciates the ESRB Staff's review and will provide additional information upon request. For follow-up questions regarding this audit summary response, please contact:

Contact Information

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Sincerely,

Kory Borzoni

Corporate Compliance Specialist

Race Communications

Attachment A: CA2026-1459 RCNS Corrective Action Tracker

(Public and Confidential versions provided)

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 **NORTH SACRAMENTO 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, as revised.
- 18
- 19 4. Concurrently with this Declaration, Race is submitting data responsive to the
20 results of an Audit of Race Communication’s facilities located in the North
21 Sacramento area, conducted on June 15-19, to the Electric Safety and Reliability
22 Branch (“ESRB”) of the Safety and Enforcement Division of the California Public
23 Utilities Commission. On August 19, 2026, the Company received the audit
24 results from Mr. Rickey Tse, PE of the ESRB. In it, the ESRB listed alleged
25 violations relating to particular facilities of the Company in the Northern
26 Sacramento area, and requested that all corrective actions be taken by the
27 Company promptly to remedy the violations. In the attached response to ESRB,
28 Race is reporting to the ESRB that corrective measures were taken, and the

DECLARATION OF CARLOS ALCANTAR

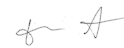
1 Company is attaching data in an Excel spreadsheet to set forth the corrective
2 action taken and the date of such action as to each alleged violation. Race is
3 providing both a confidential and a public version, with confidential information
4 redacted.
5

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

1 Penal Code Section 499c, subdiv. (a)(9) and California Evidence Code Section
2 1061.

- 3
- 4 7. In addition, Race requires, as a condition of employment, that all new employees
5 sign a confidentiality agreement. This agreement is put in place to protect
6 Race's proprietary data and information from being disclosed by employees or
7 former employees to outside parties. Race also requires all employees to sign
8 an agreement as to the employee's obligations regarding technology use, and
9 security and protection of Race's confidential and proprietary information.
- 10 8. Race also seeks to protect confidential data in Columns D and E because the
11 location of its facilities is nonpublic, sensitive information for national security
12 reasons. Pole, underground facility locations and address locations of Race's
13 customers will provide information to bad actors about the size, density and
14 location of Race's physical network. The location of Race's network is highly
15 sensitive and confidential for national security reasons. As the basis of this
16 privilege, we refer you to California Government Code Section 6254(e); and
17 Section 6254(ab) critical infrastructure information being voluntarily submitted to
18 Cal OES and national security interests.
- 19 9. I declare, under penalty of perjury, under the laws of the State of California, that
20 the foregoing is true and correct.

21 Executed on September 17, 2026, at South San Francisco, California.
22
23

24 

25 _____
26 Carlos Alcantar, CTO
27 Race Telecommunications LLC
28

Finding #	Location #	Facility ID	Latitude	Longitude	GO Rule	Category	Third Party (if TPN)	Finding Description	Corrective Action Taken	Preventive Measure	Completion Date	Status	Rule 18 Priority (1/2/3)	HFTD Tier	Compromises Worker Safety (Y/N)	Months Allowed	Rule 18 Correction Deadline	Safety Hazard? (Rule 18)	3rd-Party Notice Due (18-B)	Days Notice Overdue	3rd Party Notice Made
1	1		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Ground missing cover and not attached	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline, so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
2	1		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
3	3		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
4	6		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Race fiber ID tag placed at vault lid.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
5	7		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Race fiber ID tag placed at vault lid.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
6	9		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Race fiber ID tag placed at vault lid.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
7	10	121671995	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Clearance issue	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline, so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
8	10	121671995	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	PG&E	Slack secondary wire and slack guy wire	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	3	Non-HFTD				N	02/14/2027	-	
9	13		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Race fiber ID tag placed at vault lid.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
10	14	120338279	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	PG&E	Leaning pole	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
11	15	120338277	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	PG&E	Leaning pole and missing visibility strip on pole	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
12	18	120338273	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Abandoned drop	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	3	Non-HFTD				N	02/14/2027	-	
13	19	120338268	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Abandoned service and loose raisers	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
14	21	120352372	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	PG&E	Vegetation touching guy wires with no insulator	TPN sent 9/1/2026	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.	9/1/2026	Complete	1	Non-HFTD				Y	09/01/2026	-	9/1/2026
15	21	120352372	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Loose risers	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
16	22	120352373	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Abandoned wire	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	3	Non-HFTD				N	02/14/2027	-	
17	23	120361760	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	PG&E	Leaning pole	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
18	23	120361760	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Riser covers unattached	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
19	24	120352540	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Loose and uncovered ground and abandoned service wire touching Race wire	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
20	25	120352542	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Telephone service drop too low	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
21	26	120352543	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	PG&E	Broken ground cover	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	3	Non-HFTD				N	02/14/2027	-	
22	27		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Race fiber ID tag placed at vault lid.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Tier 2	N	60	06/19/2031	N			
23	28		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Tier 2	N	60	06/19/2031	N			
24	29		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Race fiber ID tag placed at vault lid.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Tier 2	N	60	06/19/2031	N			
25	31		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Tier 2	N	60	06/19/2031	N			
26	32		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Tier 3	N	60	06/19/2031	N			
27	33		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Tier 3	N	60	06/19/2031	N			
28	34		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Tier 3	N	60	06/19/2031	N			
29	35		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Unattached riser and missing riser cover	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Tier 3				N	02/14/2027	-	
30	35		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Tier 3	N	60	06/19/2031	N			
31	44	LC41674	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	PG&E	Guy wire touching AT&T cable	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
32	46	120183747	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Incomplete pole transfer	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
33	47	12165	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Leaning pole and missing visibility strips	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
34	48		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Loose cable riser	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
35	48		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
36	56		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Pole owned by third party; Race attachment tagged with Race fiber ID.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
37	57	121130993	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Broken ground molding and vegetation touching guy wire	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
38	57	121130993	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Vegetation touching guy wire above insulation bob	TPN sent 9/1/2026	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.	9/1/2026	Complete	1	Non-HFTD				Y	09/01/2026	-	9/1/2026
39	57	121130993	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	PG&E	Leaning pole	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
40	59		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Race fiber ID tag installed; facility identification legible from ground.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/2/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
41	71		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Race fiber ID tag installed; facility identification legible from ground.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/2/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
42	73		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	Missing Facility ID		Missing facility identification	Race fiber ID tag installed; facility identification legible from ground.	Facility identification will be checked during patrol and detailed inspections and at closeout of construction or maintenance work.	9/2/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			

Finding #	Location #	Facility ID	Latitude	Longitude	GO Rule	Category	Third Party (if TPN)	Finding Description	Corrective Action Taken	Preventive Measure	Completion Date	Status	Rule 18 Priority (1/2/3)	HFTD Tier	Compromises Worker Safety (Y/N)	Months Allowed	Rule 18 Correction Deadline	Safety Hazard? (Rule 18)	3rd-Party Notice Due (18-B)	Days Notice Overdue	3rd Party Notice Made
43	77	CPU628	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Frontier	Pole test or replacement	TPN sent 9/1/2026	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.	9/1/2026	Complete	1	Non-HFTD				Y	09/01/2026	-	9/1/2026
44	78	CPU627	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Frontier	Vegetation management to mitigate abrasion	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
45	79	CPU626	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Frontier	Pole foot damage	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
46	80	CPU894/T560	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Frontier	Damaged case and slack guy wire	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
47	82	120443852	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Damaged ground cover	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	3	Non-HFTD				N	02/14/2027	-	
48	83	120443853	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Missing riser cover and riser unattached	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
49	83	120443853	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Unattached riser cover	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
50	85	120837932	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	AT&T	Riser unattached	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
51	88	120337699	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Broken ground cover	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	3	Non-HFTD				N	02/14/2027	-	
52	89	120443989	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Clearance issue at the north span	TPN on schedule to be sent by 2/14/2027	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.		Scheduled	2	Non-HFTD				N	02/14/2027	-	
53	90	120443988	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 18	TPN Required	Comcast	Unattached riser that obstructs power switch	TPN sent 9/1/2026	Adding HFTD and Priority Tier that auto-populates the required TPN notice deadline so we have an accountable system for the future.	9/1/2026	Complete	1	Non-HFTD				Y	09/01/2026	-	9/1/2026
54	16	RC013601	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Visibility strips faded	Faded visibility strips removed and replaced with new high-visibility strips.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
55	17	RC013600	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Visibility strips faded	Faded visibility strips removed and replaced with new high-visibility strips.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/1/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
56	34		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Guy wire installation not completed	Guy wire installation completed, tensioned, and terminated to anchor per standard.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/1/2026	Complete	2	Tier 3	N	6	12/19/2026	N			
57	44	LC41674	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Needs to transfer its guy wire to its own anchor	Race guy wire transferred to its own dedicated anchor.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/1/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
58	45	PG&E061178	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Splice case not attached to messenger	Splice case re-secured to messenger with new attachment hardware.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/1/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
59	59		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Visibility strips missing one	Missing visibility strip replaced; full strip set verified.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/2/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
60	60	RC012465	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Visibility strips falling	Loose visibility strips removed and replaced with new secured strips.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/2/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
61	63	RC013843	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Visibility strips faded	Faded visibility strips removed and replaced with new high-visibility strips.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/2/2026	Complete	3	Non-HFTD	N	60	06/19/2031	N			
62	64	RC013844	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Visibility strips faded; service drop hanging	Visibility strips replaced and hanging service drop re-secured at attachment.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/2/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
63	75	FTR750693	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 31.1	Design/Maintenance		Service drop loose; third-party attachment	Loose service drop re-secured at pole attachment; hardware replaced.	Visibility markings, guying, splice case attachment, service drop condition, and closeout quality checks will be included in the inspection and post-construction review process.	9/2/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
64	21	120352372	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 35	Vegetation Mgmt		Guy wire strained by tree branch	Tree branch cleared from guy wire; strain relieved and clearance restored.	Vegetation contact, strain, and abrasion indicators will be reviewed during inspections. Conditions outside Race control will be referred through the third-party notification process.	9/1/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			9/1/2026
65	41	LC41614	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 38	Clearance		Guy wire clearance issue	Guy wire re-tensioned to restore Rule 38 clearance.	Clearance verification for service drops, service spans, and guy wires will be included in inspection forms and post-work closeout checks.	9/1/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
66	43	127xx	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 38	Clearance		Service span clearance issue	Service span re-tensioned to restore Rule 38 clearance.	Clearance verification for service drops, service spans, and guy wires will be included in inspection forms and post-work closeout checks.	9/1/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
67	46	120183747	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 38	Clearance		South side span clearance issue	Service span re-tensioned to restore Rule 38 clearance.	Clearance verification for service drops, service spans, and guy wires will be included in inspection forms and post-work closeout checks.	9/1/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
68	49	12251	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 38	Clearance		Service drop clearance issue	Service drop raised and re-secured to restore Rule 38 clearance.	Clearance verification for service drops, service spans, and guy wires will be included in inspection forms and post-work closeout checks.	9/1/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
69	59		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 38	Clearance		Service drop clearance issue	Service drop raised and re-secured to restore Rule 38 clearance.	Clearance verification for service drops, service spans, and guy wires will be included in inspection forms and post-work closeout checks.	9/2/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
70	80	CPU894/T560	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 38	Clearance		Service drop clearance issue	Service drop raised and re-secured to restore Rule 38 clearance.	Clearance verification for service drops, service spans, and guy wires will be included in inspection forms and post-work closeout checks.	9/2/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
71	4	120378754	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 54.6-B	Ground Wire		Ground wires exposed	Exposed ground wire re-covered with new molding secured to pole.	Ground wire protection and covering condition will be included in inspection forms and construction closeout checks.	9/1/2026	Complete	2	Non-HFTD	Y	12	06/19/2027	N			
72	12	120338280	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 54.6-B	Ground Wire		Ground wires exposed	Exposed ground wire re-covered with new molding secured to pole.	Ground wire protection and covering condition will be included in inspection forms and construction closeout checks.	9/1/2026	Complete	2	Non-HFTD	Y	12	06/19/2027	N			
73	14	120338279	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 54.6-I	Protective Covering		Riser unattached from pole	Riser re-attached to pole with new hardware; protective covering verified.	Riser and protective covering attachment will be included in inspection forms and construction closeout checks.	9/1/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
74	2	120378821	CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 91.3-B	Stepping		Pole step lower than 8 feet	Pole step relocated to 8 ft or higher above ground; corrected height documented.	Step placement will be checked during applicable inspections and construction closeout, with measured height documented where corrective work is performed.	9/10/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			
75	3		CONFIDENTIAL	CONFIDENTIAL	GO 95, Rule 91.3-B	Stepping		Pole step lower than 8 feet	Pole step relocated to 8 ft or higher above ground; corrected height documented.	Step placement will be checked during applicable inspections and construction closeout, with measured height documented where corrective work is performed.	9/1/2026	Complete	2	Non-HFTD	N	36	06/19/2029	N			9/1/2026