

**SAN FRANCISCO NEIGHBORHOOD
ANTENNA-FREE UNION**
4327 California Street
San Francisco, CA 94118
<http://www.antennafreeunion.org>

May 18, 2010

Karen Miller
Public Advisor
California Public Utilities Commission
505 Van Ness Avenue, Room 2103
San Francisco, CA 94102

RE: Rulemaking 08-11-005
May 25, 2010 Public Participation Hearing

Dear Ms. Miller:

I write on behalf of the San Francisco Neighborhood Antenna-Free Union (“SNAFU”), a citywide coalition of individual residents and neighborhood organizations in San Francisco, California that focuses on the impacts of wireless technologies. SNAFU submits the following comments for consideration at the Public Participation Hearing to be conducted by the California Public Utilities Commission (“CPUC”) on May 25, 2010 in Sacramento as part of the above-referenced Rulemaking proceeding.

In particular, SNAFU is responding to the CPUC’s solicitation for comments on “ways to reduce the fire risk associated with overhead power lines and telecommunications facilities,” including the “design, construction and maintenance standards for overhead facilities.” (*See* Administrative Law Judge’s Ruling Setting a Workshop for Governmental Agencies Followed By a Public Participation Hearing, p.1, filed on 4/9/10.)

SNAFU has serious concerns regarding the CPUC’s decision in 2008 to modify General Order 95 (“GO 95”) to allow Communications Infrastructure Providers (“CIPs”) to place equipment for wireless facilities above high-voltage alternating current (“HVAC”) power lines on utility poles. (*See* General Order 95, Section IX – Joint Poles or Poles Jointly Used, 94 – Antennas, *esp.* 94.4.C, 94.4.D and 94.4.G.)

Previously, all such equipment was required to be installed beneath HVAC on utility poles. Installation of such equipment beneath HVAC power lines is a time-honored safety precaution to prevent fire hazards resulting should this equipment in any way cross HVAC lines, whether as a result of earthquakes, equipment failure, or any other potential cause.

Karen Miller
Public Advisor
California Public Utilities Commission
May 18, 2010
Page 2

It appears that economically- and politically-driven pressure from wireless carriers to expedite the installation of CIP equipment on utility poles in public rights-of-way, both at the national level (via changes to the National Electrical Code) and here in California, has resulted in this imprudent modification to GO 95.

We have seen the results of the loosening and disregarding of established engineering standards, lax oversight, and placing short-term financial gain before safety considerations in the recent and ongoing oil spill disaster in the Gulf of Mexico. Financial expediency should not be the basis for engineering determinations that can have a significant impact on public safety.

SNAFU therefore respectfully requests that this policy be reversed and all CIPs with wireless infrastructure installed above HVAC on utility poles in the State of California be directed to remove this equipment according to a schedule to be determined by the CPUC.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Loranger", with a long horizontal flourish extending to the right.

Doug Loranger