



KRIS MAYES
ATTORNEY GENERAL

OFFICE OF THE ARIZONA ATTORNEY GENERAL

November 20, 2023

Dave Lewis
ANPI, LLC
1 North Wacker Drive Suite 2500
Chicago, IL 60606

Re: Aerial, Underground, and Underwater Lead-Covered Cable Inventory

Dear Dave Lewis,

As you may be aware, news organizations have recently reported on lead-covered cables installed years ago by telecommunications service providers. Lead-covered cables have been found overhead, under state and federally regulated waterbodies, and in underground conduits. These lead-covered cables may pose a public health and environmental risk as lead is released into the surrounding environment. For example, environmental sampling referenced in news reports found lead levels many hundreds of times in excess of what the Environmental Protection Agency considers safe for drinking water and for soil.

The state of Arizona has broad authority to protect the public health, safety, and welfare of its residents.¹ Pursuant to my role as the chief legal officer of Arizona,² the Attorney General's Office is working to better understand the scope of potential public and environmental health risks posed by lead-covered cables. To that end, the Attorney General's Office is requesting a full inventory of lead-covered cables owned by your company for both cable still in use to provide service and cable that is no longer in use but has yet to be removed and decommissioned. The inventory shall include:

1. The type of cable (copper or fiber);
2. Whether the cable is aerial, underground, or underwater;
3. The location of the cable, including address (if available) and GPS coordinates for the beginning and end of the relevant cable section;
4. The length of the cable; and
5. Any other information that would be useful to physically locate and to inspect the cable.

¹ *State ex rel. Brnovich v. City of Tucson*, 242 Ariz. 588, 600, 399 P.3d 663, 675 (2017), as amended (Aug. 17, 2017)

² A.R.S. 41-192A

Within 30 days of receipt of this letter, please provide the requested information to Guinevere Cassidy, Senior Paralegal either electronically (Guinevere.Cassidy@azag.gov) or as a physical copy to:

Guinevere Cassidy
Office of the Attorney General
Senior Paralegal, SGD/EES
2005 N. Central Avenue
Phoenix, AZ 85004

The AGO may request supplemental information at a later date.

Thank you in advance for your prompt response to this request.



Kris Mayes
Attorney General of Arizona

CC:
Cogency Global Inc
ANPI, LLC
1090 S. Gilbert Rd., Suite 106-128
GILBERT, AZ 85296