



KRIS MAYES
ATTORNEY GENERAL

OFFICE OF THE ARIZONA ATTORNEY GENERAL

November 20, 2023

AT&T Nevada
David Collier, Area Manager
PO Box 11010
Reno, Nevada 89520

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

Dear Mr. Collier,

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. I recently learned that in 1949, Bell Telephone Company of Nevada was issued an Army Corps of Engineers permit to cross the Colorado River with a lead-covered cable into Mohave County, Arizona.³ To evaluate the risk posed by this lead-covered cable, the Attorney General's Office is requesting a full inventory of lead-covered cables located in Arizona that AT&T Nevada or its predecessors used to provide telecommunication services, including details regarding the aforementioned cable. Please provide the following information:

1. The type of cable (e.g., 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;

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

³ USACE Permit # SPL-1949-4005200.

4. The length of the cable;
5. Whether the cable is still in use, if known; and
6. Any other information that would be useful to physically locate and to inspect the cable.

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
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
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