

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO COMPLIANCE)	
WITH EXCAVATOR LOCATE REQUESTS PURSUANT)	Case No. 2022-00363
TO KRS 367.4909 AND KRS 367.4917(7))	

RESPONSE TO INFORMATION REQUEST

Pursuant to Commission Order released November 16, 2022, in the above referenced case, Metro Fibernet, LLC (“Metronet”) submits the following response. In Kentucky, Metronet exclusively uses a third-party contractor, USIC, to perform the company’s locates. Therefore, the data provided in response to the following Information Requests was prepared by USIC. Non-data responses reflect Metronet’s practices and procedures.

Respectfully Submitted,

/s/ Rose Mulvany Henry _____

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A. Since January 1, 2022, the number of locate requests received in total and broken out into the types of locate requests contained in KRS 367.4909(5):

Metronet’s Response to Information Request A (USIC Data):

Type of Locate Requests	Number Received
Normal	43,270
Emergency	882
Information Request	154
Large Project (Not not a KY811 Ticket Type)	1,022
Unmapped or Untonable	Not a KY811 Ticket Type
Fiber-to-the-premises broadband deployment	0

B. Since January 1, 2022, the number of second or subsequent requests for the same locate request received in total and broken out into the types of locate requests contained in KRS 367.4909(5):

Metronet’s Response to Information Request B (USIC Data):

Type of Locate Requests	Number of Second or Subsequent Requests Received
Normal	29
Emergency	1
Information Request	0
Large Project (Not not a KY811 Ticket Type)	7
Unmapped or Untonable	Not a KY811 Ticket Type
Fiber-to-the-premises broadband deployment	0

C. Since January 1, 2022, the length of time required to respond to each requestor/excavator in total and broken out into the types of locate requests contained in KRS 367.4909(5). Also, provide information showing whether underground facilities are marked within the statutory window, and the average time it takes to respond to a locate request:

Metronet’s Response to Information Request C (USIC Data):

Type of Locate Requests	Average Response Time/Days
Normal	2.1
Emergency	0.09
Information Request	8.97
Large Project (Not not a KY811 Ticket Type)	2.29
Unmapped or Untonable	Not a KY811 Ticket Type
Fiber-to-the-premises broadband deployment	N/A

D. Since January 1, 2022, the number of times an agreement has been reached with an excavator outside of the statutory time limits required by KRS 367.4909, with the aggregate numbers and broken out into the types of locate requests contained in KRS 367.4909(5):

Metronet’s Response to Information Request D (USIC Data):

Type of Locate Requests	Number ICB Agreements
Normal	712
Emergency	2
Information Request	2
Large Project (Not not a KY811 Ticket Type)	82
Unmapped or Untonable	Not a KY811 Ticket Type
Fiber-to-the-premises broadband deployment	0

E. Since January 1, 2022, state whether locate requests have been performed by Utility personnel or by a third-party contractor. If the answer is both, provide the number of locate requests performed by Utility personnel and third-party contractors, respectively:

Metronet’s Response to Information Request E:

Metronet utilized a third-party contractor, USIC, to perform its locates.

F. State whether records and statistics are kept of the number of underground facilities located accurately versus inaccurately. Provide all records and statistics compiled since January 1, 2022:

Metronet’s Response to Information Request F (USIC Data):

USIC and Metronet maintain data whenever there is reported damage to a facility due to an inaccurate locate.

Number of Damages Located Accurately	Number of Damages Located	
	Inaccurately	
11		1

G. Explain the method used to determine whether an underground facility has been located accurately versus inaccurately.

Metronet’s Response to Information Request G:

In addition to following all statutory and regulatory requirements, Metronet and its third-party contractor, USIC, follow best practices for all underground locations and locates. Metronet notifies USIC of any damages to Metronet’s facilities via the use of the KY 811 system. Metronet contacts USIC to perform an investigation to determine the fault into two primary categories: Locator At-Issue and Locator Not At-Issue. Metronet works with USIC to provide any information and to update both our internal utility mapping as well as the facilities registered with the KY 811 system. Additionally, USIC performs on-site investigation using a hit kit, measurements and photos. Best practices are applied on the photos and USIC and Metronet utilize a ticketing system for historical tracking purposes.

H. State what policies and procedures have been implemented to reduce the number of inaccurately located facilities. Provide information detailing the efficacy of those procedures on reducing the number of inaccurately located underground facilities:

Metronet's Response to Information Request H:

Metronet continually reviews and updates all mapping provided to USIC and the KY 811 system to ensure our fiber is protected. Additionally, Metronet ensures the best application of locating technologies by ensuring tone wire is placed in all facilities placed underground. Metronet also participates in a variety of local and national Damage Prevention efforts including, but not limited to, the Common Ground Alliance and the National Telecommunications Damage Prevention Council to ensure our company is in the best position to reduce damages. In addition, Metronet and USIC conduct regularly scheduled meetings to measure performance and discuss improvements.