

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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

**RESPONSE OF COMCAST CABLE COMMUNICATIONS, LLC, ON BEHALF OF
AFFILIATES, TO COMMISSION’S NOVEMBER 16, 2022 ORDER**

In response to the Commission’s November 16, 2022 Order in the above-styled case, Comcast Cable Communications, LLC, on behalf of its affiliates doing business in the Commonwealth of Kentucky (together, “Comcast”), provides the following information in response to ordering paragraph number 2.

- 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).

Response: Between January 1 and November 30, 2022, Comcast received the following locate requests:

Type of Locate Request	Number of Requests Received
Normal	9,990
Emergency	421
Information Request	35
Large Project ¹	889
Unmapped or Untonable	Data not available
Fiber-to-the-Premises Broadband Deployment	0
Total	11,335

¹ Because “large projects” are not a distinct KY811 ticket type, for purposes of this response, Comcast has identified large projects as those requests for which the location of facilities took longer than 30 minutes to complete.

- 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).

Response: Between January 1 and November 30, 2022, Comcast received the following second or subsequent requests for the same locate request:

Type of Locate Request	Number of Second or Subsequent Requests Received
Normal	22
Emergency	0
Design Information Request	0
Large Project	6
Unmapped or Untonable	Data not available
Fiber-to-the-Premises Broadband Deployment	0
Total	28

- 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.

Response: Between January 1 and November 30, 2022, Comcast responded to each locate request type, on average, in the following timeframes, each of which is within the statutory timeframes.

Type of Locate Request	Average Response Time (in Days)
Normal	1.72
Emergency	0.12
Design Information Request	4.17
Large Project	2.18
Unmapped or Untonable	Data not available
Fiber-to-the-Premises Broadband Deployment	N/A
Total (Weighted Average)	1.70

- 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).

Response: Between January 1 and November 30, 2022, Comcast reached agreements with excavators to locate facilities outside the statutory time limits as follows:

Type of Locate Request	Number of Agreements
Normal	105
Emergency	1
Design Information Request	0
Large Project	34
Unmapped or Untonable	Data not available
Fiber-to-the-Premises Broadband Deployment	0
Total	140

- 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.

Response: Comcast contracts with a third-party vendor, USIC Locating Services, LLC, to locate all of its facilities in the Commonwealth of Kentucky.

- 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.

Response: Comcast typically only investigates the accuracy of locates when its facilities are damaged by an excavator. Between January 1 and November 30, 2022, Comcast experienced four (4) damages to its facilities in Kentucky, and the ensuing investigations determined that Comcast's facilities were accurately located in all cases.

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

Response: The accuracy of locates is determined through an on-site investigation using a "hit kit," measurements, and photos.

- 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.

Response: As required under its contract with Comcast, USIC trains its technicians to standards that meet generally accepted national locating practices and measures for safety, quality, and locating efficiency. Comcast is in regular communication with USIC, holding biweekly calls to discuss overall performance and key metrics.

Dated: December 29, 2022

Respectfully submitted,



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