

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE TO INFORMATION REQUEST

Pursuant to Commission Order released November 16, 2022, in the above referenced case, this response is submitted on behalf of Broadwing Communications, LLC; CenturyLink Communications, LLC; Global Crossing Local Services, Inc.; Global Crossing Telecommunications, Inc.; Level 3 Communications, LLC; Level 3 Telecom of Kentucky, LLC; TelCove Operations, LLC; and WilTel Communications, LLC (collectively referred to hereinafter as “Lumen”).

Respectfully submitted,

/s/ Katie Wagner  
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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).

**Lumen’s Response to Information Request A:**

Normal locates pursuant to KRS 367.4909(5)(a)	19,555
Emergency locates pursuant to KRS 367.4909(5)(b)	1,132
Design information requests pursuant to KRS 367.4909(5)(c)	167
Large project requests pursuant to KRS 367.4909(5)(d)	0
Unmapped or untonable facility requests pursuant to KRS 367.4909(5)(e)	1
Fiber-to-the-premises broadband deployment requests pursuant to KRS 367.4909(5)(f)	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).

**Lumen’s Response to Information Request B:**

Normal locates pursuant to KRS 367.4909(5)(a)	488
Emergency locates pursuant to KRS 367.4909(5)(b)	28
Design information requests pursuant to KRS 367.4909(5)(c)	2
Large project requests pursuant to KRS 367.4909(5)(d)	0
Unmapped or untonable facility requests pursuant to KRS 367.4909(5)(e)	1
Fiber-to-the-premises broadband deployment requests pursuant to KRS 367.4909(5)(f)	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.

**Lumen’s Response to Information Request C:**

	HH:MM:SS
Normal locates pursuant to KRS 367.4909(5)(a)	17:57:47
Emergency locates pursuant to KRS 367.4909(5)(b)	00:21:37

	HH:MM:SS
Design information requests pursuant to KRS 367.4909(5)(c)	17:45:49
Large project requests pursuant to KRS 367.4909(5)(d)	N/A
Unmapped or untonable facility requests pursuant to KRS 367.4909(5)(e)	N/A <sup>1</sup>
Fiber-to-the-premises broadband deployment requests pursuant to KRS 367.4909(5)(f)	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).

**Lumen’s Response to Information Request D:**

Normal locates pursuant to KRS 367.4909(5)(a)	0
Emergency locates pursuant to KRS 367.4909(5)(b)	0
Design information requests pursuant to KRS 367.4909(5)(c)	0
Large project requests pursuant to KRS 367.4909(5)(d)	0
Unmapped or untonable facility requests pursuant to KRS 367.4909(5)(e)	1
Fiber-to-the-premises broadband deployment requests pursuant to KRS 367.4909(5)(f)	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.

**Lumen’s Response to Information Request E:** Locates are performed both by Lumen personnel and third-party contractor Stake Center. The number of locate requests performed by Lumen personnel to date is 21,194 and the number of locates performed by third-party contractor Stake Center to date is 999. Note that some responses in early January 2022 relate back to locate tickets from late December 2021.

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<sup>1</sup> With respect to Lumen’s single unmapped or untonable facility requests pursuant to KRS 367.4909(5)(e), no original locate ticket was discovered during investigation; it appears that our first engagement on this was for the repair.

F. State whether records and statistics are kept of the number of underground facilities located accurately versus inaccurately.

**Lumen's Response to Information Request F:** Lumen maintains data when there is a damage due to an inaccurate locate.

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

**Lumen's Response to Information Request G:** In addition to following any and all statutory and regulatory requirements, Lumen and its third-party contractors adhere to best practices for underground location. In documenting responses, technicians attach post locate photos upon completion of the locate. Best practices on the photos are applied (visible landmark in the background, GPS coordinates and date and time stamps are added) and attached to the locate ticket 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.

**Lumen's Response to Information Request H:** Recurring locate performance meetings are conducted with locators to address performance issues, and drive accountability for inaccurate locates. Lumen Technologies has an internal policy to address individual performance issues for employees; and expects the same of our Locate contractors. Lumen has incurred no damages year to date through November as a result of inaccurately located facilities.