

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE TO INFORMATION REQUEST

Pursuant to Commission Order released November 16, 2022 in the above referenced case, submitted here are the responses to the requested information filed on behalf Duo County Telephone Cooperative and its wholly owned subsidiary Cumberland Cellular, LLC both operating under the name of Dou Broadband.

Respectfully submitted,

/s/ Howard Kent Cooper

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Dou Broadband

Request 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 a:

Normal locates:	2,575
Normal locates with negotiated commitment:	109
Emergency locate:	69
Design Information Request:	15
Large project request:	0
Unmapped or untonable request:	4
Fiber-to-the-premises broadband deployment request:	0
Total Requests (sum of above):	2,772

Dou Broadband

Request 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 b: Included in the response to request a, the company reported the following second or subsequent requests for the same locate:

Normal locates:	276
Normal locates with negotiated commitment:	38
Emergency locate:	0
Design Information Request:	0
Large project request:	0
Unmapped or untonable request:	0
Fiber-to-the-premises broadband deployment request:	0
Total Requests (sum of above):	314

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Request 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 c: Please refer to Exhibit A for length of time required to respond to each requestor/excavator. For each category of locate, the company was at or below the statutory requirement.

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Request 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 d: The company contractor takes responsibility for locates of company facilities within the boundaries of an open project at time of bid award until construction is complete on project. The count below reflects that the company designates those locate requests as negotiated.

Normal locates: 109

Request 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 e: Utility Personnel performs all locate requests except for those requests submitted by the company contractor under an open project performed for the company. The company contractor takes responsibility for locates of company facilities within the boundaries of an open project at time of bid award until construction is complete on project. These 109 tickets shown below reflect that in the requested time span.

Type of Request	Employee	Contractor
Normal locates:	2,575	0
Normal locates (negotiated):	0	109
Emergency locate:	69	0
Design Information:	15	0
Large project:	0	0
Unmapped or untonable:	4	0
Fiber-to-the-premises:	0	0

Duo Broadband

Request 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 f: Work orders are opened when damages occur to our facilities. Those workorders indicate accurate versus inaccurate locates. From January 1, 2022 to November 16,2022 there have been 2 out of 2,772 locates that were deemed inaccurate.

Request g: Explain the method used to determine whether an underground facility has been located accurately versus inaccurately;

Response g: When a buried utility is damaged or cut, Duo Broadband sends a representative to investigate and take pictures at the incident location. A work order is opened in house to track repairs of said damage. It is at the site visit that the Duo field representative determines if the underground facility was located accurately or not and reported accordingly on a report of the incident which is signed off on later.

Request 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 h: In order to keep the number of inaccurately located underground facilities to a minimum, Duo Broadband has implemented policies to improve its accurate including, but not limited to:

- All fiber optic cable purchased and placed in the field is tone-able regardless if it is placed aerial or buried. This is to eliminate the possibility of accidentally burying non-tone-able fiber intended for aerial construction and ensure all fiber facilities can be located.
- The company CAD department works diligently to keep graphical records up to date and accurate. This allows locator(s) to have a general understanding of what is in the ground at the requested location prior to arriving to perform the locate.

These two policies have successfully reduced the possibility of an inaccurate locate.