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December 30, 2022
Via E-File

Ms. Linda Bridwell, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

**RE: Case Number 2022-00363 - In the Matter of Electronic Investigation Into Compliance with
Excavator Locate Requests Pursuant to KRS 367.4909 and KRS 367.4917(7)**

Response of Illinois Network Alliance, LLC d/b/a Bluebird Network – Utility ID: 5057140

Dear Ms. Bridwell:

Please accept the enclosed Response submitted on behalf of Illinois Network Alliance, LLC d/b/a Bluebird Network to the Kentucky Public Service Commission's Request for Information in Case No. 2022-00363.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to cwrightman@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman
Consultant

tms: KYx2201

CW/im

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

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

RESPONSE

Illinois Network Alliance LLC d/b/a Bluebird Network (INA) submits this response to the Commission's Request for Information as follows:

- 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: Since January 1, 2022, INA has received 0 locate requests.
- 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 request contained in KRS 367.4909(5);
 - Response: Since January 1, 2022, INA has received 0 second or subsequent requests.
- 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 with the statutory window, and the average time it takes to respond to a locate request;
 - Response: Since INA has received no locate requests, this question is not applicable.
- 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: Since INA has received no locate requests, this question is not applicable.

- e. Since January 1, 2022, state whether locate requests have been performed by Utility personnel and third-party contractors, respectively;
- Response: Since INA has received no locate requests, this question is not applicable.
- 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: INA does not own underground fiber facilities in Kentucky. INA's network presence within Kentucky utilizes leased fiber whereas the fiber owner maintains the fiber plant, therefore this question is not applicable.
- g. Explain the method used to determine whether an underground facility has been located accurately versus inaccurately; and
- Response: INA does not own underground fiber facilities in Kentucky. INA's network presence within Kentucky utilizes leased fiber whereas the fiber owner maintains the fiber plant, therefore this question is not applicable.
- 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: INA does not own underground fiber facilities in Kentucky. INA's network presence within Kentucky utilizes leased fiber whereas the fiber owner maintains the fiber plant, therefore this question is not applicable.

RESPECTFULLY SUBMITTED

/s/Douglas Zerr

Douglas Zerr
SVP of Engineering
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