

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 Request for Information

Pursuant to the Commission Order dated November 16, 2022 in the above-referenced matter, MCI Communications Services LLC d/b/a Verizon Business, MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services, and XO Communications Services, LLC (collectively, "MCI") respectfully submit this response to the Information Request.

Respectfully submitted,

/s/ Carey Gagnon

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RESPONSES

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):

| Ticket Type | Number Received |
|--|------------------------|
| Total | 39,461 |
| Normal | 36,182 |
| Emergency | 3,122 |
| Design | 157 |
| Large Project | 0 |
| Unmapped or Untonable | 0 |
| Fiber-to-the premises broadband deployment | 0 |

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):

| Ticket Type | Number of Second Requests Received |
|--|---|
| Total | 906 |
| Normal | 848 |
| Emergency | 54 |
| Design | 4 |
| Large Project | 0 |
| Unmapped or Untonable | 0 |
| Fiber-to-the premises broadband deployment | 0 |

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):

| Ticket Type | Average Days to Respond |
|--|--------------------------------|
| Total | 2 |
| Normal | 3 |
| Emergency | less than 1 |
| Design | 1 |
| Large Project | N/A* |
| Unmapped or Untonable | N/A* |
| Fiber-to-the premises broadband deployment | N/A* |

* There were no requests in these categories.

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):

| Ticket Type | Number of Agreements |
|--------------------|-----------------------------|
| Total | 5,809 |
| Normal | 5,806 |

| | |
|--|---|
| Emergency | 3 |
| Design | 0 |
| Large Project | 0 |
| Unmapped or Untonable | 0 |
| Fiber-to-the premises broadband deployment | 0 |

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): Locate requests have been performed by both MCI employees and third-party contractor Stake Center.

| Ticket Processed by: | Total Tickets |
|-----------------------------|----------------------|
| MCI | 17,578 |
| Third-Party Contractor | 21,883 |

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): MCI maintains records when there is damage due to an inaccurate locate.

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

Response (g): MCI follows all statutory and regulatory requirements and adheres to best practices for underground location. Accuracy is assessed both through

documentation audits and onsite field audits. During documentation audits, prints are compared to the ticket and the field photos to ensure the site is marked, the lines on the prints are all accounted for, and documentation is captured in accordance with standard policies and procedures. The field audits are performed to ensure accuracy and quality.

In addition, when there is damage due to an inaccurate locate, MCI dispatches an employee to the damage area for the purpose of investigation and repair. During investigation efforts the employee collects data to determine the root cause of the damage. When the area has been marked according to best practices, the employee performs a second tone and mark for the purpose of confirming existing locate marks are accurate.

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): MCI has internal policies to address individual employee performance. In addition, MCI Communications Services' Vendor Management Center evaluates third party locate performance to ensure the expected performance is met, and contracts with third-parties hold the locate company accountable for all damage costs associated with an inaccurate locate. In the event an inaccurate locate is identified, a variety of remedial and disciplinary actions may be utilized, appropriately tailored to the circumstances. These actions can include providing the locator with additional training or retraining, checking equipment calibration, increasing the audits of a locator's current and past work where tickets are still active, documenting and sharing lessons learned during regularly scheduled safety meetings, field coaching with senior

personnel, and progressive discipline if necessary. MCI did not encounter a damage due to inaccurately locating a facility during 2022.