

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))**

WINDSTREAM’S RESPONSE TO INFORMATION REQUEST

Pursuant to the Kentucky Public Service Commission’s (“Commission”) Order issued on November 16, 2022, in the above referenced matter, Windstream¹ hereby submits this response to the information requested.

RESPONSES

- 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);**

Windstream’s Response:

Type of Locate Requests	Number Received (1/1/22 – 11/30/22)
Normal	155,564
Emergency	4,191
Information/Design Request	165
Large Project	4,597

¹ Windstream Kentucky East, LLC, Windstream Kentucky West, LLC, Windstream KDL, LLC, Broadview Networks, Inc., Business Telecom, LLC, DeltaCom, LLC, McLeodUSA Telecommunications Services, LLC, Network Telephone, LLC, PAETEC Communications, LLC, Talk America, LLC, The Other Phone Company, LLC, US LEC of Tennessee, LLC, Windstream Communications, LLC, Windstream New Edge, LLC, Windstream Norlight, LLC, and Windstream NuVox, LLC

- 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);

Windstream's Response:

Type of Locate Requests	Number of Second or Subsequent Requests Received (1/1/22 – 11/30/22)*
Normal	21,583
Emergency	42
Information Request	0
Large Project	20

*These numbers include "update" 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 within the statutory window, and the average time it takes to respond to a locate request;

Windstream's Response:

Type of Locate Requests	Average Response Time HH:MM
Normal	2.15
Emergency	0.13
Information Request	7.6
Large Project	2.18

- 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);

Windstream's Response:

Type of Locate Requests	Number ICB Agreements (1/1/22 – 11/30/22)
Normal	997
Emergency	4
Information Request	2
Large Project	277

- 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;**

Windstream's Response: Tickets are first reviewed by internal Windstream employees to determine if the request can be cleared, tickets that require a physical locate are sent to a third-party contractor. 111,640 tickets were cleared internally and 48,128 were dispatched to Windstream's third-party contractor.

- 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;**

Windstream's Response: Locate accuracy is generally only investigated when a facility damage occurs; the following data reflects records and statistics of accuracy from damage investigations. From January 1, 2022, to November 30, 2022, of those investigated 46 were located accurately and 7 were located inaccurately.

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

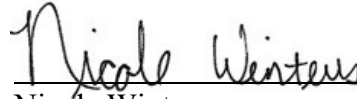
Windstream's Response: Windstream and its third-party contractors follow any and all statutory and regulatory requirements related to locates and investigations. In addition, each adheres to industry best practices, including documentation of efforts taken as well as on site investigation using a standard "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.**

Windstream's Response: Windstream works closely with its third-party contractor to ensure it is using the most current locating equipment and participates in regularly

scheduled meetings to discuss performance and cooperatively facilitate improvements as necessary to current processes and procedures.

Respectfully Submitted,

A handwritten signature in black ink that reads "Nicole Winters". The signature is written in a cursive style and is positioned above a solid horizontal line.

Nicole Winters

Senior Counsel

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