



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))**

**RESPONSE OF ZAYO GROUP, LLC
TO ORDER OF NOVEMBER 16, 2022**

In response to the Commission’s Order of November 16, 2022, Zayo Group, LLC (“Zayo”) provides the following information:

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):

Normal locates pursuant to KRS 367.4909(5)(a)	2,763
Emergency locates pursuant to KRS 367.4909(5)(b)	293
Design information requests pursuant to KRS 367.4909(5)(c)	24
Large project requests pursuant to KRS 367.4909(5)(d)	0
Unmapped or untonable facility requests pursuant to KRS 367.4909(5)(e)	0
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);

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)	0
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:

Normal locates pursuant to KRS 367.4909(5)(a)	2.5 Days
Emergency locates pursuant to KRS 367.4909(5)(b)	.5 Days
Design information requests pursuant to KRS 367.4909(5)(c)	3.9 Days
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
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 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):

Normal locates pursuant to KRS 367.4909(5)(a)	1,387
Emergency locates pursuant to KRS 367.4909(5)(b)	0
Design information requests pursuant to KRS 367.4909(5)(c)	10
Large project requests pursuant to KRS 367.4909(5)(d)	0
Unmapped or untonable facility requests pursuant to KRS 367.4909(5)(e)	0
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:

Locate requests are performed by a 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;

Locate accuracy is generally only investigated when a facility damage occurs and Zayo has incurred no damages.

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

Both documentation audits and onsite field audits are regularly performed. During documentation audits, prints are compared to the ticket and the field photos to ensure the site is marked and the lines on the prints are all accounted for and documentation is captured in accordance with set policies. The field audits are performed to ensure accuracy and quality, and audit results trigger a number of progressive remedial actions.

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.

Zayo continuously works with its locate Vendor to ensure a responsible process. The vendor's employees undergo intense in-house training to ensure all locators understand and comprehend the locate process. When issues are identified with the work remedial and disciplinary actions occur. Zayo has incurred no damages year to date as a result of inaccurately located facilities.