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Via Alternative Electronic Filing

Michelle Thebert
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

Re: COMCAST'S RESPONSE TO NOTICE OF PROBABLE VIOLATION
Docket No. 45140

Dear Ms. Thebert:

Comcast Cable Communications Management, LLC, on behalf of its affiliates in Georgia (together, "Comcast" or the "Company"), has been working to address the issues raised in the Notice of Probable Violation ("NOPV") issued on March 14, 2024.

Comcast remains committed to the timely location of underground facilities—both as an owner and an excavator. The Company is working closely with its locate vendor, USIC, to ensure the timeliness of our response and completion of dig tickets in Georgia. Below is a list of Comcast's ongoing efforts:

- Comcast and USIC have established bi-weekly senior-level meetings to discuss USIC's performance and plans to meet ongoing compliance goals. These regular meetings will improve communication and coordination necessary to ensure performance.

- The Company and USIC are now in the development and testing stage of an improved data collection system that will increase the frequency of data availability from weekly or monthly to daily. This will improve Comcast's ability to monitor USIC's performance.

- Comcast has requested data and strategy on staffing from USIC. Specifically, the Company has requested additional information on USIC's hiring goals, including targeted areas of hiring, to ensure not only that USIC has the appropriate headcount but also that USIC is allocating the appropriate resources to locating Comcast's facilities.

- Comcast is actively working with Georgia 811 to confirm the Company's contact information is current to improve communication for excavators.

- The Company is currently evaluating its Ticket Management System ("TMS") and actively pursuing opportunities to improve the system and performance. An improved TMS will (1) enable Comcast to more efficiently screen new dig tickets before they are assigned to USIC, thus reducing the total number of tickets requiring physical location, and (2) enhance Comcast's ability to track ticket status and communicate with USIC promptly when tickets are in danger of going into a late status.

- Comcast updates its service area maps in the Georgia 811 system on a monthly basis to provide accurate information regarding the location of its underground facilities, which in turn improves the accuracy of dig tickets generated by the 811 system. The Company is currently assessing the viability of a system to provide real-time map updates.

- Comcast is evaluating its contract with USIC to improve performance metrics and ensure compliance with stated goals.

Additionally, attached hereto is a document prepared by USIC addressing its efforts to improve performance and communications with the dig community in Georgia.

Comcast requests that the Commission dismiss the NOPV, in light of the continued efforts of both the Company and its locator to improve communication within the industry and to improve on-time performance. To the extent the Commission does not dismiss the NOPV, Comcast requests an informal conference with Staff to negotiate a settlement. Commission Rule 515-9-4-.09 states:

> Upon a determination that a violation of the Act may have occurred, the Commission Staff shall take one or more of the following actions:
>
> (1) Enter settlement negotiations with the Respondent. Upon reaching agreement on settlement terms, the Commission Staff shall present the proposed settlement to the Commission for acceptance or rejection. If the Commission Staff and the Respondent are unable to reach agreement on settlement terms, the Respondent may present additional facts to the Advisory Committee;
>
> (2) Request that the Commission issue a Rule Nisi pursuant to Commission Rules.

No settlement negotiations have occurred. Therefore, Comcast respectfully requests an informal conference to allow for settlement negotiations if the NOPV is not dismissed. To the extent that Comcast and Staff are unable to agree on settlement terms or Staff is not willing to hold an informal conference, Commission Rule 515-9-4-.08 requires the Advisory Committee to present a recommendation to the Commission for contested probable violations. Therefore, the Company would like to appear before the Advisory Committee to present additional facts as permitted under Commission Rule 515-9-4-.09.

If you have any questions, please do not hesitate to contact me.

Sincerely yours,

Holland & Knight LLP

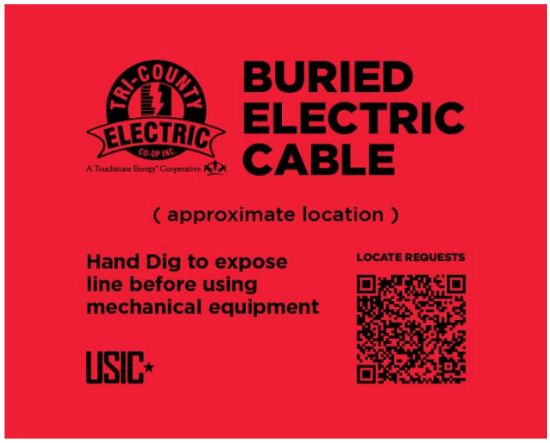


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ATTACHMENT A

1. **How to improve communications with the dig community.**

- **Local USIC Contact Information at Every Jobsite** - USIC innovated with its utility partners adding a QR code to utility marking flags that allows the excavator on site to access contact information for local USIC Operations, searchable by ticket number, address, or map, as shown below. The QR code also links to Groundwork, a video that USIC has produced in English and Spanish to support its excavator education initiatives.





- **Excavator Education** - USIC is also disseminating the Groundwork video and other educational resources to the excavation community through multiple channels. The goal of the material is to provide guidance for submitting locate requests that helps eliminate the need for unnecessary marks and remarks and prevents locate-related delays. The videos are also available on USIC's website.

- **Enhanced Focus on Excavator Communications** - USIC has increased training and developed a stronger process around excavator communications at the Supervisor and Locator level to ensure strong coordination of activities between excavator and locator teams. This includes notification processes, meet-sheet documentation, and system-enforced notifications with standardized operational reporting to continue to drive adherence.

- **USIC Dig Check App** - USIC has invested in communication and collaboration tools such as Dig Check, which provides excavators with visibility to the status of their tickets to increase coordination between excavator and locator teams.

- **Standardizing Large Project Communications** - The Georgia statute clearly defines what constitutes a large project; however, there have been inconsistencies in its application. Historically, excavators have called in standard tickets with scopes of less than one mile but including multiple addresses and complexities that take longer

to complete. To help with this, USIC is working at a local level to improve the proper use of the large project rule. This includes increasing the use of USIC's "Large Project Locating Agreements" ("Agreement") between utilities/their contract utility locators ("locator/utility") and excavators. The goal of these Agreements is to treat large project tickets appropriately, reduce or eliminate damages to utility facilities, and help excavators complete their work more efficiently. The Agreement includes:

- The ability for the excavator to designate sections of the project with specific "complete by" dates and times in alignment with the excavation schedule.
- A commitment by the locator/utility to provide contact information for locate technicians working on the project and for their supervisors.
- A requirement for:
    - Any modification of the Agreement by the excavator to be reviewed and agreed to by both parties.
    - The excavator to notify the locator/utility before beginning any excavation to ensure the specific sites have been marked.
    - The excavator to contact the locator/utility and advise of a need to move to a site that has not been marked or confirmed to have been marked accurately by the locator/utility and to allow time for the locator/utility to respond.
    - The locator/utility to be available and respond within 48 hours of such notification to mark the site or confirm the accuracy of the existing marks.
    - Any deviation to the Agreement to be called in to Georgia 811 as an additional request; the utility to respond within 48 hours; and if the utility fails to respond in this timeframe, the excavator to contact the utility and allow time to respond.

- Conduct on-site pre-job briefings for large projects, at which:
    - The excavator can communicate the scope and timing of the project in advance to enable the utility locator to prepare for staffing needs.
    - Contact information can be shared to help ensure consistent communication and coordination.

2. **What we are doing individually to improve performance.**

- **USIC introduced Managed Services -** With this new service product, USIC assigns dedicated Managed Services technicians to a project, which has been shown to increase daily productivity up to 70% on fiber installations.

- **Investments in Wages** - USIC invested approximately $1 M in 2021 and $2.8 M in 2023 to raise the starting wage for locate technicians in Georgia to continue to improve USIC's ability to recruit and retain qualified technicians.

- In 2024, USIC has retained more than 320 qualified technicians dedicated to protecting infrastructure and communities throughout Georgia and remains focused on maintaining optimal headcount to meet demand and deliver the highest quality, on-time locates.
- **Partnering with Local Education** - USIC is investigating the opportunity to expand its Career & Technical Education program to Georgia. Currently, USIC partners with vocational education institutions in Indiana, New York, and Oklahoma, creating a pipeline of fully trained, qualified technicians eligible to begin working for the company immediately upon graduation and completion of the program. Learn more about USIC's innovative Career & Technical Education program on the company's website.
- **Increased & More Intensive Training** - USIC has made significant investments in the expansion and enhancement of its training program, which is accredited by Nulca, representing utility locating professionals. The training period for newly hired technicians has increased from 4 to 12 weeks and provides significant hands-on, on-the-job training in the field to ensure proficiency upon beginning to perform locates independently. This also serves to increase locator confidence, leading to improved workforce retention.
- **Leadership Training for Field Ops** - In 2024, USIC is also introducing a new leadership training program for field operations leaders, beginning with lead technicians, in alignment with the company's core values of safety, pride, respect, integrity, and excellence.
- **Improvements in Forecasting** - USIC has invested heavily in labor forecasting technologies in 2024. Advanced volume prediction models overlay historical volume trends with current economic, weather, and environmental trends at a local level with input to account for large-scope utility work, such as fiber overlay projects. The employment of these technologies is enhancing USIC's ability generate highly accurate labor models to inform recruiting and hiring strategies for meeting the consistently evolving demand for locating services.
- **Investments in Technology** - USIC has invested heavily in mobile technology to provide an enhanced technician experience with the goal of streamlining locating functions. Additional investments have been made in physical locating technology that provides both enhanced quality and easier to use interfaces to streamline facility locating.

3. What the industry is doing to improve.

The damage prevention industry is engaged in consistent collaboration to improve quality and on-time performance and reduce damage to underground utility facilities. USIC demonstrates its commitment to such engagement and collaboration through:

- Membership in the Common Ground Alliance (CGA) - USIC serves on all CGA committees and collaborates with a broad range of damage prevention stakeholders to advance the shared goal of reducing damages 50% in five years.
- Membership in Nulca, representing utility locating professionals - USIC collaborates with a broad range of damage prevention stakeholders to prevent damages, promote safety, and enhance communication. USIC Regional Director Mike Marrero serves as President of Nulca's Board of Directors. USIC's training standards and methodology have been accredited by Nulca for meeting the Nulca Competence Standard, which is recognized by the Common Ground Alliance Best Practices.
- Participation Damage Prevention Summits and meetings of the Georgia Utilities Coordinating Council.
- Double Diamond level sponsorship of the 2024 Georgia Utilities Coordinating Council Annual Conference.
- Regular participation in GA 811 Board of Directors' meetings and committee meetings and recent collaboration to address the increasing rise in the volume of emergency tickets.
- Joint membership in Georgia Chamber of Commerce with Atlanta Gas Light.

Additionally, Georgia utilities and USIC have collaborated closely on drafting and advocating for legislation and rules which drive improved performance by utility locators, prevent damage to critical infrastructure, and protect Georgia communities, including:

- The 2022 enactment of new PSC rules regarding Georgia Utility Facility Protection Act procedures for large projects, and the review of proposed legislation.
- Providing more encouragement for the use of white lining by providing white paint at Georgia Utility Contractors Association meetings.
- Georgia has a higher-than-average number of emergency tickets, and we are discussing how to best address this issue in the Georgia Utility Facility Protection Act and planning to share this information with the Georgia Utility Contractors Association. USIC currently reports abuse of the emergency ticket directly to Georgia 811 and reaches out to contractors to explain why an emergency ticket should be cancelled and follow up with guidance on submitting a new normal ticket and including clear locate instructions.