California Underground Facilities Safe Excavation Board
("Dig Safe Board")

February 10, 2020

Agenda Item No. 5 (Information Item) – Staff Report

Discussion on Development of Emergency Regulations Allowing Electronic Positive Response Good Cause Extension Applications (AB 1166)

PRESENTERS

Jeff Brooks, Attorney
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SUMMARY

This report provides the results of an online survey the Board conducted of underground facility owners (or "operators") to determine the barriers they might face in providing electronic positive response by the statutory deadline of January 1, 2021. These results indicate a widespread lack of awareness of the electronic positive response requirement and a further confusion as to how to comply with it. Additionally, representatives from the state's two regional notification ("one-call") centers ("DigAlert" and "USA North 811") will provide an update on the current options available to provide electronic positive response[1]. This information is intended to promote discussion and direction from the Board on the definition of good cause as it considers drafting regulations to establish a process to extend the compliance deadline for operators to provide electronic positive response.

BACKGROUND

The Dig Safe Act of 2016 ("the Act") required the one-call centers to be equipped to receive electronic positive response from operators and utility locators by January 1, 2018[2]. Under the Act, operators are required to provide a positive response[3] to all locate requests (or "tickets")[4]. In addition to providing a positive response, operators also had the option of providing electronic positive response to the one-call centers by electronically transmitting the status of their response to a locate request using defined codes. Many operators choose not to voluntarily provide electronic positive response.

In 2019, the Legislature introduced Assembly Bill 1166 (Levine) to address locate and mark records falsification allegations made by the California Public Utilities Commission ("PUC") in

[1] An electronic positive response is a utility operator's electronically transmitted communication to the one-call center using pre-determined codes that provides the status of an operator's response to a locate request (or "ticket").
[2] GOV 4216.3(c)
[3] A positive response is a utility operator's physical response to a locate request, and includes marking the ground with paint or other markings, or providing information like a map, to indicate the existence of underground facilities in the work zone.
[4] GOV 4216.3(a)(1)(A)

its adjudicatory proceeding involving Pacific Gas and Electric Company ("PG&E"),[5] by requiring operators to provide electronic positive response to the one-call centers for all locate requests by January 1, 2021. The Board took a "support if amended" position on AB 1166, citing concern that some operators would not be able to meet the proposed deadline, and asked the Legislature for authority to grant limited extensions[6]. The bill was amended to include the extensions, and signed into law by Governor Gavin Newsom on October 3, 2019.

On January 1, 2020, AB 1166 took effect, requiring all operators to respond to tickets using electronic positive response by January 1, 2021. To allow sufficient time to implement the new requirements, the Legislature directed the Board to develop a process for extending the compliance deadline, up to an additional year, for operators who demonstrate good cause for needing one. Lawmakers also required the Board to: "determine which facts or circumstances constitute good cause" and to adopt regulations to implement the extensions by January 1, 2021[7]

DISCUSSION

Initial discussion among the Board about what constitutes good cause began at its December 2019 meeting. Anecdotal information provided during the discussion indicated that many mid-size and large operators currently use an electronic ticket management system ("TMS"), but those systems are not configured to provide electronic positive response codes to the one-call centers. In contrast, other operators, mainly smaller entities and municipalities, receive tickets via email and manually print out and dispatch those emails to their utility locators. Further information provided during the December 2019 discussion indicated that smaller operators would need to build a system or create a process to provide electronic positive response. Board members and stakeholders also raised concern over the lack of knowledge among operators about the new statutory requirements.

The Board recognized that in order to make an informed decision about good cause, it needed more information from operators regarding the reason or reasons those operators may need an extension to the January 1, 2021 deadline. In addition, the Board needed to understand the current methods an operator may use to provide electronic positive response to the one-call centers and how accessible those methods are to operators.

Online Survey

On January 10, 2020, the Board launched an online survey *(See Attachment A: Survey Questions)* designed to gather information about operator knowledge of the statutory requirement; how the operator currently receives, processes, assigns, and tracks tickets; and the obstacles the operator believes would keep their organization from providing electronic positive response by the statutory deadline. To reach as many operators as possible, staff asked DigAlert and USA North 811 to send a dedicate email promoting the survey to their members. Staff also sent requests to promote the survey to the League of California Cities and the Association of California Water Agencies. The survey ran from January 10th to January 31st, and generated 52 responses from a variety of operators.

Survey Takeaway One: Current Process for Receiving, Processing & Assigning Tickets

For the Board to determine the circumstances that constitute good cause for needing an extension to the electronic positive response requirement, it must first understand how operators currently receive, process, assign, and respond to tickets. Survey respondents were asked a series of

[5] No. I.18-12-007
[6] Resolution No. 19-07-03
[7] GOV 4216.3(c)(1)(A)

questions regarding this process, including: the methods by which their organization receives tickets from the one-call centers; how those tickets are processed, assigned, and tracked; whether their organization currently provides electronic positive response; and how they do it.

Most survey respondents told the Board their organizations receive tickets via email, though the method by which those requests are processed, assigned, and tracked vary as illustrated in **Figure One**.

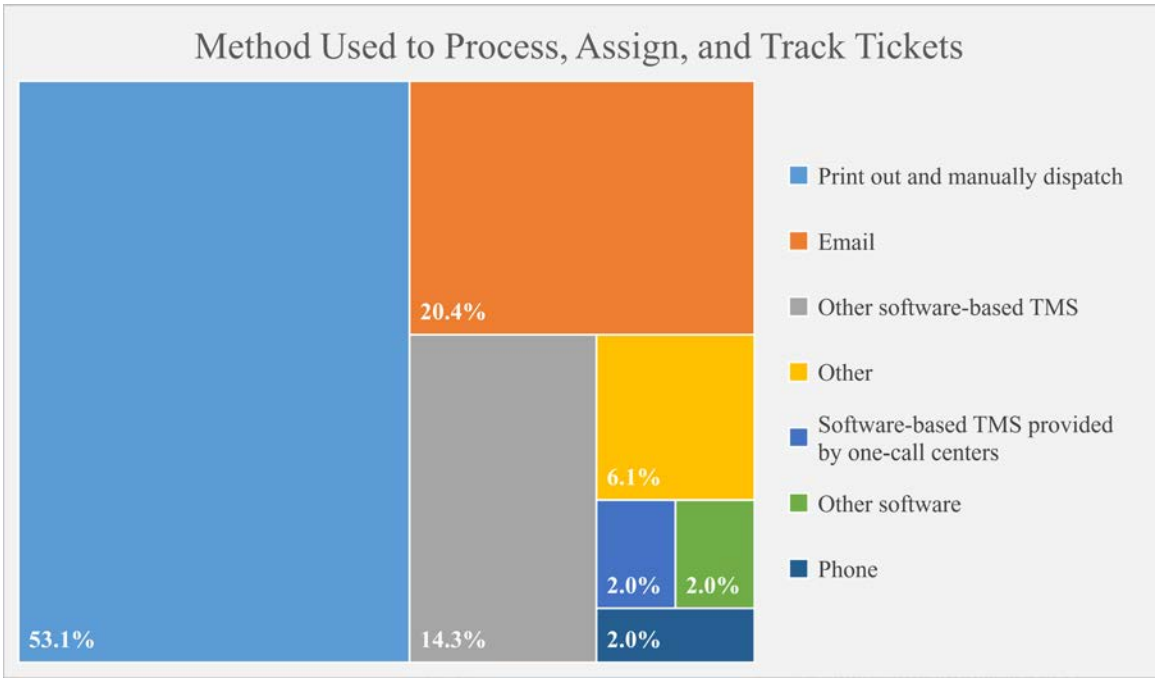


Figure 1: Treemap illustrates the methods survey respondents use to process, assign, and track tickets received from the one-call centers. Respondents who chose "other" did not specify an alternative method.

Over half of survey respondents say they print out and manually dispatch the tickets they receive from the one-call centers. When asked if their organization currently provides electronic positive response, these respondents said no. As illustrated in **Attachment B: Survey Results Summary**, only eight of the 52 operators who responded to the Board's survey currently provide electronic positive response. Of those eight respondents, all provide electronic positive response for 75%-100% of the tickets received from the one-call centers.

Survey Takeaway Two: Challenges Operators Face Implementing Electronic Positive Response

Equally important for the Board to understand prior to determining the circumstances that constitute good cause are the reasons operators believe they would not be able to implement electronic positive response by January 1, 2021. Survey respondents were asked to identify existing obstacles and provide specific details regarding these challenges. The survey broke potential obstacles into four categories: technology, personnel, financial, and procurement of goods and/or services, as illustrated in **Figure Two**. Respondents were able to choose as many options as applicable.

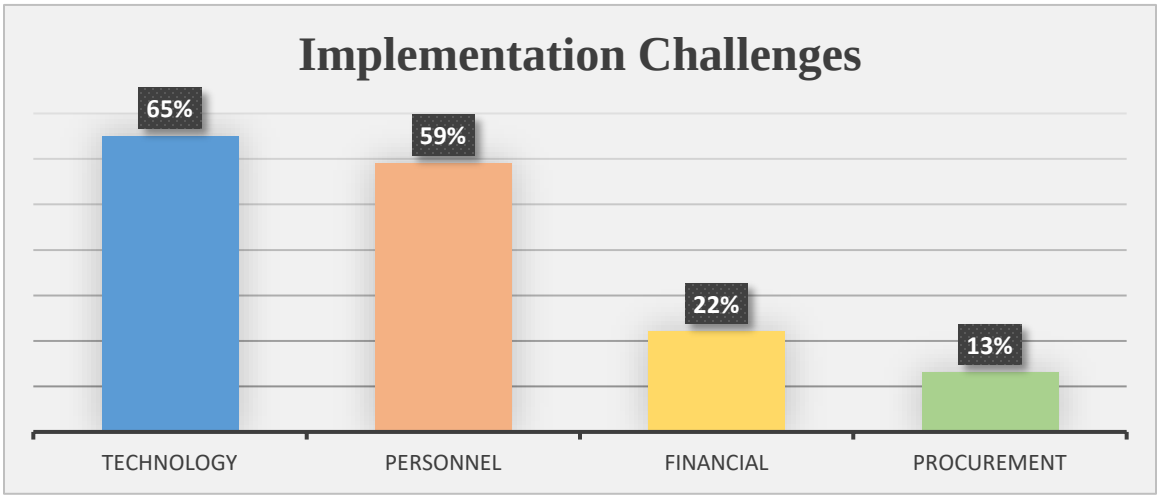


Figure 2: Bar graph illustrates the broad challenges to implementing electronic positive response identified by survey respondents. Operators who took the survey were allowed to choose as many options as applicable.

TECHNOLOGY

As illustrated in **Attachment B: Survey Results Summary**, nearly two-thirds of survey respondents identified technology as an obstacle to their organization meeting the compliance deadline.

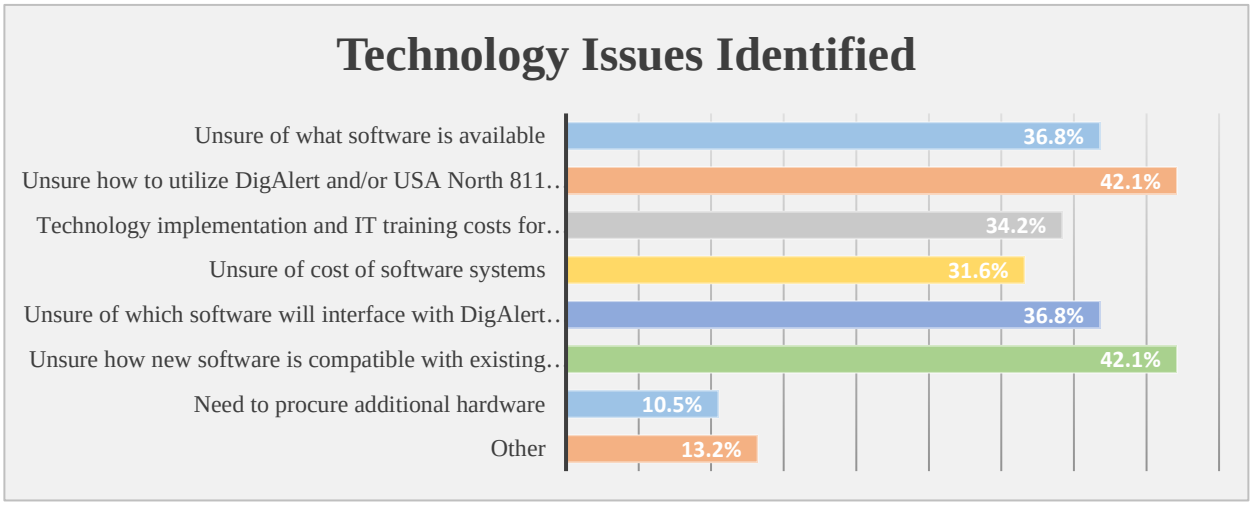


Figure 3: Bar graph illustrates the technological issues survey respondents identified as barriers to complying with the January 1, 2021 deadline to provide electronic positive response. Respondents who chose "other" discussed a variety of issues included in "Attachment B."

A breakdown of the specific technology issues illustrated in **Figure Three** shows most survey respondents were unsure of the software and/or internet options available to provide electronic positive response to the one-call centers. Respondents were asked to further elaborate on these issues using the survey's free text option. Many discussed the steps their organization is currently taking to comply with the requirement. Others indicated the email they received about the Board's survey was the first time they were told about the requirement. Some discussed the difficulty they encountered finding instructions on how to provide electronic positive response through the one-call centers' websites.

PERSONNEL

As illustrated in **Attachment B: Survey Results Summary**, more than half of survey respondents identified personnel as an obstacle to their organization meeting the compliance deadline.

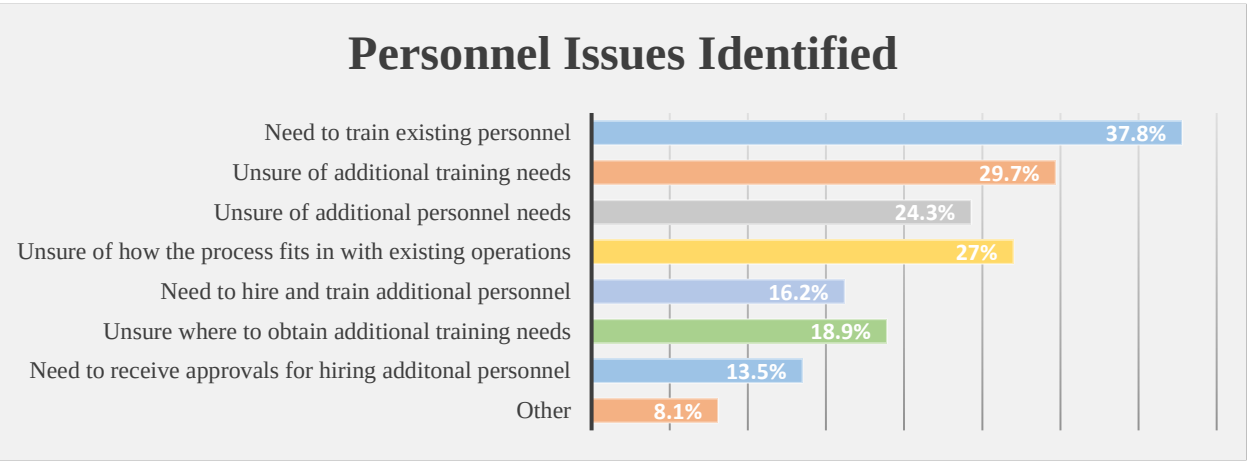


Figure 4: Bar graph illustrates the personnel issues survey respondents identified as barriers to complying with the January 1, 2021 deadline to provide electronic positive response. Respondents who chose "other" discussed a variety of issues included in "Attachment B."

A breakdown of the specific personnel issues illustrated in **Figure Four** shows most survey respondents were unsure of how providing electronic positive response fits in with their existing operations, and the additional personnel and training needs it would take to implement the requirement. Respondents were asked to further elaborate on these issues using the survey's free text option. Many discussed a lack of staffing available to provide electronic positive response. Others discussed their organization's need to better understand the time and training commitment of requiring staff to provide electronic positive response daily.

FINANCIAL

As illustrated in **Attachment B: Survey Results Summary**, less than one-fifth of survey respondents identified financial as an obstacle to their organization meeting the compliance deadline.

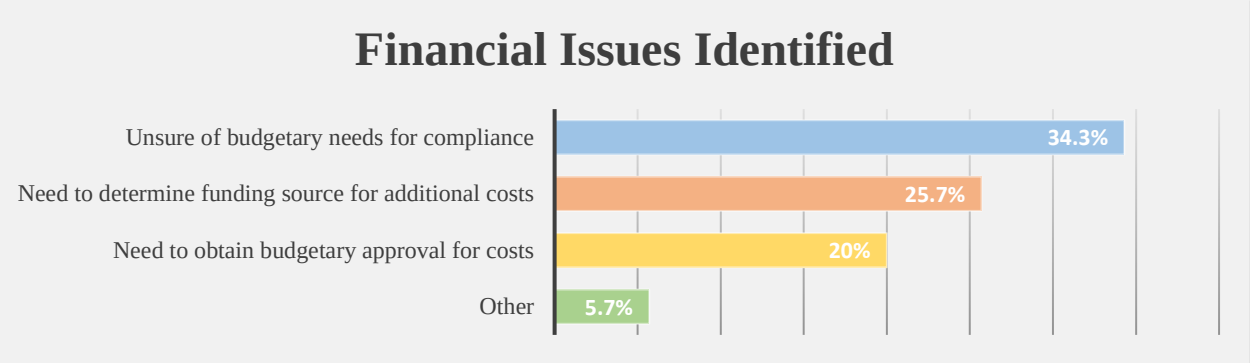


Figure 5: Bar graph illustrates the financial issues survey respondents identified as barriers to complying with the January 1, 2021 deadline to provide electronic positive response. Respondents who chose "other" discussed a variety of issues included in "Attachment B."

A breakdown of the specific financial issues illustrated in **Figure Five** shows most survey respondents were unsure of the impact this requirement would have on their organization's budget.

Respondents were asked to further elaborate on this issue using the survey's free text option. One respondent discussed the lack of funding available for additional staff. Another discussed a lack of knowledge about the cost of implementing electronic positive response.

PROCUREMENT OF GOODS AND/OR SERVICES

As illustrated in **Attachment B: Survey Results Summary**, about one-eighth of survey respondents identified procurement of goods and/or services as an obstacle to their organization meeting the compliance deadline.

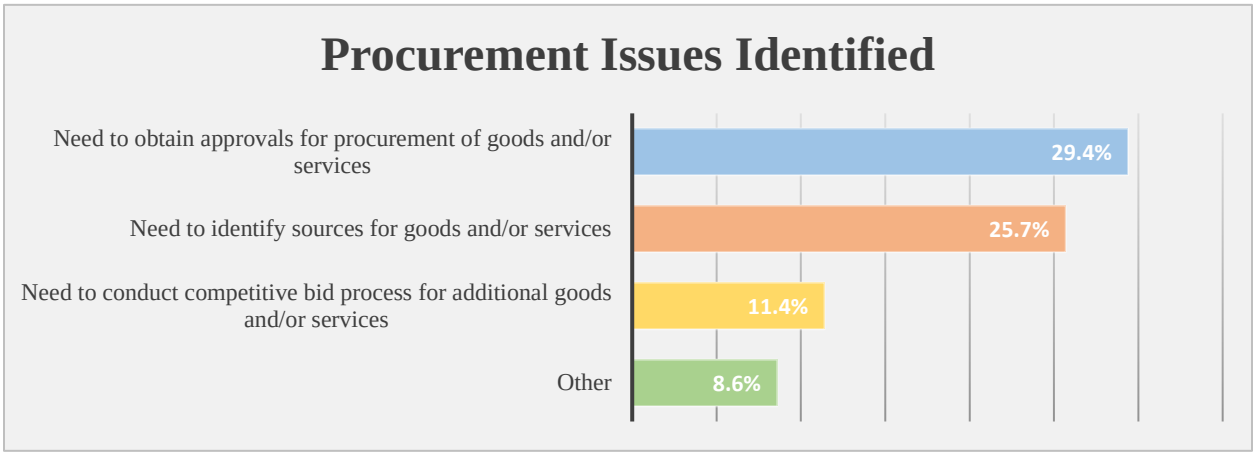


Figure 6: Bar graph illustrates the procurement issues survey respondents identified as barriers to complying with the January 1, 2021 deadline to provide electronic positive response. Respondents who chose "other" discussed a variety of issues included in "Attachment B."

A breakdown of the specific procurement issues illustrated in **Figure Six** shows most survey respondents needed to identify the sources of and obtain approval to procure the goods and/or services needed to implement the requirement. Respondents were asked to further elaborate on this issue using the survey's free text option. One respondent discussed their organization's requirement to source bids for the goods and/or services required to implement the requirement.

OTHER

In addition to the four obstacle categories, survey respondents were given the opportunity to list any other reasons their organization would be unable to meet the compliance deadline. As illustrated in **Attachment B: Survey Results Summary** only one-tenth of respondents indicated another reason, which included issues with the company that provides the organization's ticket management program.

Survey Takeaway Three: Awareness of Electronic Positive Response Requirement

As the Board discusses the circumstances that constitute good cause for needing an extension, it is important to understand the current level of awareness about the requirement to provide electronic positive response. Survey respondents were asked a series of questions regarding their knowledge of the requirement and how they were made aware as illustrated in **Figure Seven.**

Over half of survey respondents say their organization is aware of the requirement. When asked how their organization was made aware, these respondents indicated the one-call centers, a trade group, or the Board as the source of the information. As illustrated in **Attachment B: Survey Results Summary**, many survey respondents indicated through free text that the email they received regarding the Board's online survey was the first time they recall being notified of the

requirement.

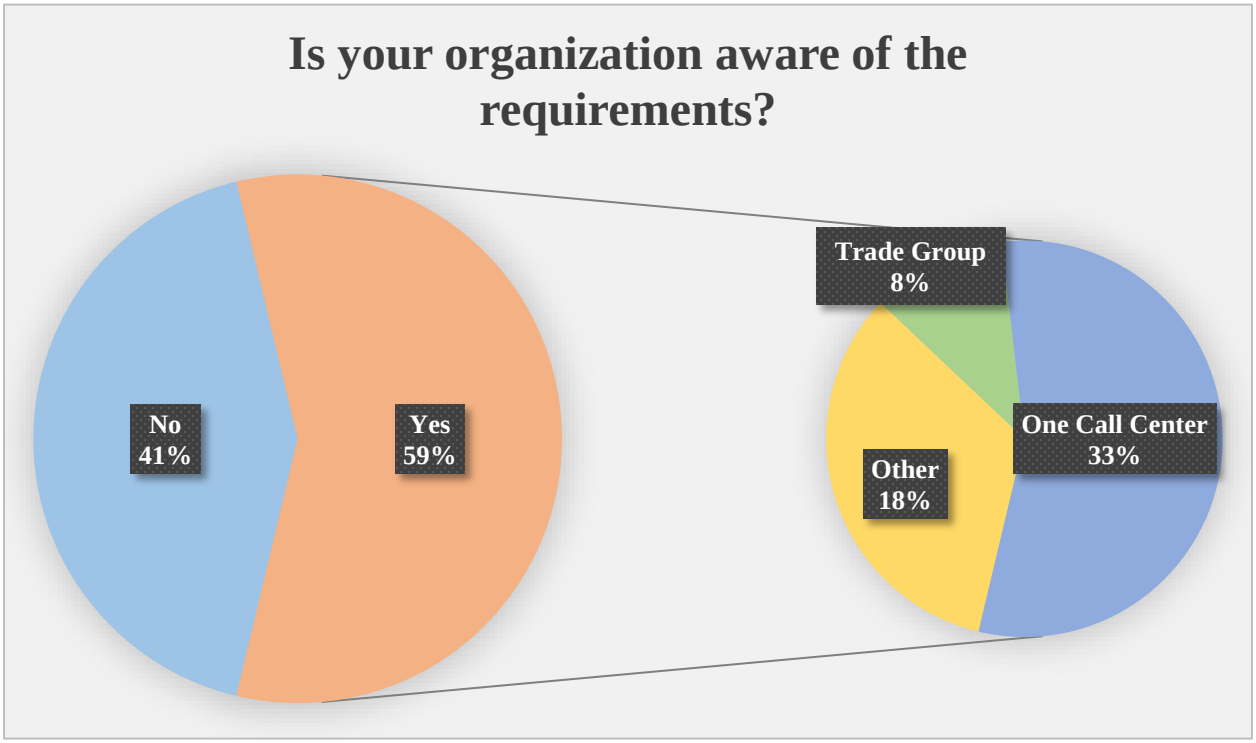


Figure 7: Pie charts illustrate survey respondents' knowledge of the statutory requirements to provide electronic positive response by January 1, 2021 and how respondents were made aware of the requirement.

Recommendation

Staff recommends the Board consider the results of the online survey and the update provided by representatives of the one-call centers as it discusses the definition of good cause as it considers drafting emergency regulations to establish a process to extend the compliance deadline for operators to provide electronic positive response.

Attachments

A. Survey Questions
B. Survey Results Summary

ATTACHMENT A: SURVEY QUESTIONS

Welcome! Thank you for taking the time to fill out the Dig Safe Board's electronic positive response requirement survey.

Assembly Bill 1166 was signed into law in October of 2019 and amends Government Code Section 4216.3 to require utility operators to respond to locate requests with electronic positive responses through DigAlert and/or USA North 811 by January 1, 2021. AB 1166 also allows the Dig Safe Board to authorize extensions for compliance to no later than December 31, 2021 for those operators who show good cause for needing such an extension (GOV 4213.3(c)(1)(A)).

While operators currently have the option of providing an electronic positive response, it is not required. With electronic positive response, the operator responds electronically to the one call center with the status of their response to the request to locate. Responses may include such options as: "Locate Area Marked", "Clear – No Conflict", "No Access to Locate Area – Resend Ticket Requested", etc. The excavator will then be able to look up the status of the response from all operators who were notified on the ticket, fulfilling the intent of closing the communications loop between operators and excavators by providing clear responses for the status of requests to locate.

Please answer the following questions, and provide any feedback that you feel may be beneficial to the Board.

NOTE: Use the arrows on the bottom, right hand side of the screen to scroll between questions to review past answers or skip any questions that do not apply to your organization. All questions are optional.

1. Are you familiar with electronic positive response?
   - Yes
   - No

2. Is your organization aware of the requirements of AB 1166 to provide electronic positive response by January 1, 2021?
   - Yes
   - No

3. How were you made aware?
   - Trade Group
   - Lobbyist
   - League of Cities
   - One Call Center
   - Other, Please Explain:

4. How does your organization currently receive tickets from the one call centers?

Software-based ticket management system provided by the one call centers
   - Other software-based ticket management system
   - Email
   - Other, please explain:

5. How does your organization currently process, assign, and track responses to tickets received from the one call centers?
   - Software-based ticket management system provided by the one call centers
   - Other software-based ticket management system
   - Other software
   - Print Out and Manually Dispatch
   - Email
   - Phone
   - Other, please explain:

6. Does your organization currently provide electronic positive response by electronically transmitting to the one call center the status of your response to locate requests?

- Yes
- No

7. If yes, how often does your organization currently provide electronic positive response?

- 75-100% of Tickets
- 50-75% of Tickets
- 25-50% of Tickets
- 1-25% of Tickets

8. If your organization provided electronic positive response, how did it do so?

Software-based ticket management system provided by the one call centers

- Other software-based ticket management system
- DigAlert/USA North 811 Website
- Phone call
- Email
- Other, please explain:

9. Has your organization discussed implementing electronic positive response?

10. Please explain:

11. What obstacles exist that would keep your organization from providing electronic positive response for all of your tickets by January 1, 2021?

- Technology
- Personnel
- Financial
- Procurement of goods and services

12. If you identified technology as a barrier, please select the following issues that apply to your organization:

- Unsure of what software is unavailable
- Unsure of cost of software systems
- Unsure of how software is compatible with existing internal systems
- Unsure of which software will interface with DigAlert and/or USA North 811
- Need to procure additional hardware
- Technology implementation and IT training costs for existing staff

Unsure of how to utilize DigAlert and/or USA North 811 website(s) to provide response

- Other, please explain:
- My organization does not believe technology is a barrier

13. Please provide specifics on the option(s) you selected:

14. If you identified personnel as a barrier, please select the following issues that apply to your organization:

- Unsure of how the process fits in with existing operations
- Unsure of additional personnel needs
- Unsure of additional training needs
- Unsure where to obtain additional training needs
- Need to receive approvals for hiring additional personnel
- Need to hire and train additional personnel
- Need to train existing personnel
- Other, please explain
- My organization does not believe personnel is a barrier

15. Please provide specifics on the option(s) you selected:

16. If you identified financial as a barrier, please select the following issues that apply to your organization:
    Unsure of budgetary needs for compliance
    Need to determine funding source for additional costs
    Need to obtain budgetary approval for costs
    Other, please explain:
    My organization does not believe financial is a barrier

17. Please provide specifics on the option(s) you selected.

18. If you identified procurement as a barrier, please select the following issues that apply to your organization:
    Need to identify sources of goods and/or services
    Need to conduct competitive bid process for additional goods and/or services
    Need to obtain approvals for procurement of goods and/or services
    Other, please explain:
    My organization does not believe procurement is a barrier

19. Please provide specifics on the option(s) you selected

20. Are there any other reasons your organization would be unable to provide electronic positive response for all tickets by January 1, 2021?
    Yes
    No

21. If yes, please provide a detailed explanation

22. Is there anything else you would like to add?

23. Please provide your email address (optional)

Thank you for taking the time to participate in the Dig Safe Board's electronic positive response requirement survey. Your feedback will help in the Board's development of its emergency regulations.

ATTACHMENT B: SURVEY RESPONSE SUMMARY

Survey Period: January 10, 2020 to January 31, 2020

Survey Responses: 52

SURVEY QUESTIONS	ANSWERS
1. Are you familiar with electronic positive response? *(51 of 52 respondents answered)*	Yes: 19 No: 32

2. Is your organization aware of the requirements of AB 1166 to provide electronic positive response by January 1, 2021? *(51 of 52 respondents answered)*	Yes: 30 No: 21

3. How were you made aware? *(28 of 52 respondents answered)*	One-Call Center: 17 Trade Group: 4 League of Cities: 0 Lobbyist: 0 Other*: 9

*Respondents who chose "Other" were able to free-type their answer, listed here: "Supervisor email," "USA North email," "facility owner," "GIS and utility contractors," "involvement with the Dig Safe board and regulation creation process," "811 conference," "Dig Safe Board meeting participation," "811," "USA North 811 email"

4. How does your organization currently receive tickets from the one-call centers? *(50 of 52 respondents answered)*	Email: 39 Software-based ticket management system provided by the one-call centers: 4 Other software-based ticket management system: 8 Other*: 2

*Respondents who chose "Other" were able to free-type were able to free-type their answer, listed here: • "Not Sure" • "I probably get one or less tickets a year."

5. How does your organization currently process, assign, and track responses to tickets received from the one-call centers? *(49 of 52 respondents answered)*	Print out and manually dispatch: 26 Email: 10 Software-based ticket management system provided by the one-call centers: 1 Other software-based ticket management system: 7 Other software: 1 Phone: 1 Other*: 3

*Respondents who chose "Other" were able to free-type were able to free-type their answer, listed here: • "Not Sure" • "Our member code has no utilities- we're notified so we know where people are working and need permits" • "I am a one member water & wastewater operation and if there is to be an excavation I know it before hand."

6. Does your organization currently provide electronic positive response by electronically transmitting to the one-call center the status of your response to the locate requests? *(51 of 52 respondents answered)*	Yes: 8 No: 43

7. If yes, how often does your organization currently provide electronic positive response? *(8 of 52 respondents answered)*	75-100% of Tickets: 8 50-75% of Tickets: 0 25-50% of Tickets: 0 1-25% of Tickets: 0

8. If your organization has provided an electronic positive response, how did it do so? *(8 of 52 respondents answered)*	Software-based ticket management system provided by the one-call centers: 1 Other software-based ticket management system: 3 DigAlert and/or USA North 811 Website: 3 Email: 1 Phone call: 0 Other*: 0

*Respondents who chose "Other" were able to free-type their answer. No answers were provided for this question.

9. Has your organization discussed implementing electronic positive response? *(50 of 52 respondents answered)*	Yes: 25 No: 25

10. Please Explain*: *(44 of 52 respondents answered)*

*Survey respondents were able to free-type their answers, listed here: • "We have a target of implementing EPR by 7/1/2019 but are expecting to beat that target date" • "Preliminary review and discussions" • "First hearing of this." • "Not sure it is necessary." • "Unaware of what it was" • "I was just made aware. We will be discussing in the coming weeks." • "LWD has designated utility mark out person to manage the DigAlert tickets" • "We are an excavator so no response is required" • "The company that provides our software based ticket management system is working towards implementing a positive response system" • "We are aware that we will have to do it, but have not formulated a plan on how we will complete it. We have questions as to which types of tickets require an EPR, and which don't. As we print our tickets from email, and dispatch, we believe having to submit EPR's will be quite time consuming until we are able to incorporate a software based ticket management system." • "We are a small agency with a limited number of employees" • "We have had discussions regarding the requirement, and how it will affect a tiny operation such as our water district" • "We weren't aware of the new law. Now that we have been notified we will comply. • "We are waiting for the development of the email auto-response to be implemented." • "Just became aware of the situation" • "We are a small electrical company and only provide services to the Fort Mojave Trible Lands in Needles Calif. So are service territory is located on the Reservation only." • "Can someone contact me at 657-278-3257 or cdowling@fullerton.edu" • "This new requirement may be difficult to implement for our school district who does not have many underground utilities" • "Will be discussing." • "Just informed about the new law and was told to start implementing electronic response requirement" • "We are aware the need to do this, but do not know how or were we need to go to do a positive response" • "I have spent 1 1/2 hours this morning on the digalert.org website and can't find instructions, a link or anything telling us how to use electronic positive response" • "A plan is in place to implement EPR soon after two additional response codes are added (New Start Time agreed to by Excavator & Phasing Plan agreed to with Excavator)" • "Current system testing is underway to integrate electronic positive response with One-Call Center" • "we will be on board within a couple of months" • "We are a small mutual water co. that receives one or two tickets a year. Most times it is for water lines on the property owners property that we are not responsible for." • "We currently have a positive response system in place." • "We are a small system - 91 water meters and get almost no tickets from a call center" • "Not sure how to implement" • "We're 'asked' to voluntarily transmit PR; as such we transmit accordingly" • "We are not familiar with or have access to the system if there is one available. No one had notified us or trained us in its use" • "We would like to get away from paper copies & reply online" • "Internal staff meetings" • "We understand the new regulations. We most likely will cease being members" • "I have not been involved in the electronic response system" • "Not up to speed on current regulations" • "As states make it a requirement we see if it applies to all tickets, just no conflict, just marked or both then make adjustments to our program" • "We have discussed the possibility of transitioning from our current email system for receiving tickets to a web based ticket management system. We did not budget for a subscription to this service so there is a concern over the additional expense." • "Have not had discussion." • "A discussion on this topic is planned at a staff meeting next month." • "We are just getting into it."

11. What obstacles exist that would keep your organization from providing electronic positive response for all of your tickets by January 1, 2021? *(44 of 52 respondents answered)*	Technology: 29 Personnel: 26 Financial: 10 Procurement of goods and/or services: 6

12. If you identified technology as a barrier, please select the following issues that apply to your organization:	Unsure of what software is available:	14
	Unsure of cost of software systems:	12
	Unsure of how software is compatible with existing internal systems:	16
	Unsure of which software will interface with DigAlert and/or USA North 811:	14
	Need to procure additional hardware:	4
	Technology implementation and IT training costs for existing staff:	13
	Unsure of how to utilize DigAlert and/or USA North 811 website(s) to provide response:	16
	Other*:	5
(38 of 52 respondents answered)	My organization does not believe technology is a barrier:	4

*Respondents who chose "Other" were able to free-type were able to free-type their answer, listed here: • "Our current DigAlert ticket management system is working toward offering positive response by does not yet." • "Lack of information on your digalert.org-not a technology issue" • "Minor issues only If 'No significant barriers exist or are anticipated' was an option, I would have chosen that." • "lack of internet access in the field" • "Alignment of PR to responses required by USAN"

13. Please provide specifics on the option(s) you selected*:

(27 of 52 respondents answered)

*Survey respondents were able to free-type their answers, listed here: • "Yet to see how our internal IRTHNet communicates positive response to USA North" • "Need IT to get involved" • "How do I log in" • "We utilize a ticket management system based on a specific computer program. The system does not currently offer a positive response" • "We do not currently use an electronic ticket management system. Until we do, we believe that someone will have to respond to all tickets at the end of the day either via the website or with an app. We are not sure what electronic ticket management systems are available, and whether they handle EPR." • "We need to train our staff on how to access the website and input the status of the marking of our utilities" • "I am just finding out about everything, so we need to do some research" • "Need to confirm the ticket auto notification is operational and meets our company's need." • "This has just come to light and will have to address with the proper personnel" • "As an electrical utility we will comply with any technology options going forward" • "We do not know anything about this technology." • "Yes, please give me the link so we can do the positive response." • "Again, I have spent 1 1/2 hours this morning looking for instructions or a link that leads to a way to input positive responses. If it is not available, how do you expect them to be done?" • "Our organizations ticket management system Irthnet is currently not communicating with Dig Alert's system when a response is sent. We are aware of the issue and actively working with Sue Erbe at DigAlert to understand and resolve challenges. Our organization anticipates meeting the January 1, 2020 compliance date." • "As long as it was a simple way to respond to the tickets I don't see this as a huge issue for our utility." • "We would like to join the online program but we are not clear on how it works" • "Integration with our current CMMS system" • "We have zero staff available to respond to 20,000 tickets" • "Could we coordinate our system to work with yours or will line locators need to make entries in both systems?" • "We are currently using the no cost Electronic Positive Response via the DigAlert website. We can continue doing so in order to comply with the January 2021 requirement. My responses to the question are only in terms of improving efficiency to

provide the response." • "Our ISD department limits us from using hardware in the field." • "The options clearly state our needs." • "We are in the process of modernizing our business practices and our ticket management is on the list. Our process hasn't changed in 20+ years."

14. If you identified personnel as a barrier, please select the following issues that apply to your organization:		
	Unsure of how the process fits in with existing operations:	10
	Unsure of additional personnel needs:	9
	Unsure of additional training needs:	11
	Unsure where to obtain additional training needs:	7
	Need to receive approvals for hiring additional personnel:	5
	Need to hire and train additional personnel:	6
	Need to train existing personnel:	14
	Other*:	3
(37 of 52 respondents answered)	My organization does not believe personnel is a barrier:	14

*Respondents who chose "Other" were able to free-type were able to free-type their answer, listed here: • "Have to get the guys to remember to do it." • "Insufficient funding for personnel to respond to 20,000 tickets – nearly all will be no conflict as our member code has no facilities"

15. Please provide specifics on the option(s) you selected*:
(17 of 52 respondents answered)

*Survey respondents were able to free-type their answers, listed here: • "Small organization with few tickets, not sure this is necessary" • "Not sure of how much additional time this will take per day and whether the locations in the field will have enough time to complete their normal tasks along with completing the EPR's at the end of the day. Also not sure how long it will take to train existing locators on how to complete EPR's" • "For a small water district such as ourselves where one staff member wears multiple hats adding this requirement is adding a burden to a simple task. Which in turn is going to require more management to make sure the electronic positive response is being performed hence pulling other staff members off tasks to make sure this step is being followed. Also, since the staff member that marks our underground utilities is not very familiar with computers, he's going to need a lot of help and training." • "Again, this is a process that needs to go through its proper course" • "Will be a task to get them employees to remember to do it" • "will contact IT dept. to get training" • "We are not clear on how the system works" • "no funding available for needed personnel to respond to 20,000 tickets" • "We have no staff to provide a field response" • "Unsure on how much time will be needed" • "Need more qualified staff." • "Additional personnel or contractor procurement is of concern to the City." • "Again, we've used the same process for ticket management for 20+ years and will need to train our staff on a new process, including using the new technology."

16. If you identified financial as a barrier, please indicate the following issues that apply to your organization:	Unsure of budgetary needs for compliance: 12 Need to determine funding source for additional costs: 9 Need to obtain budgetary approval for costs: 7 Other*: 2 My organization does not believe financial is a barrier: 19
(35 of 52 respondents answered)	

*Respondents who chose "Other" were able to free-type were able to free-type their answer, listed here: • "Need to understand if mandatory PR structure would require development"

17. Please provide specifics on the option(s) you selected*:
(11 of 52 respondents answered)

*Survey respondents were able to free-type their answers, listed here: • "Not sure how much additional time this will take per day." • "We are not clear on the cost of the program" • "No funding available for necessary additional staff" • "This is a terrible time wasting survey. The lack of technology is on the digalert.org website, not ours." • "Need justifications for new procurement of hardware equipment." • "Unsure of funding sources for this requirement." • "How much does it cost for initial setup and annual maintenance?"

18. If you identified procurement as a barrier, please select the following issues that apply to your organization:	Need to identify sources of goods and/or services: 9 Need to conduct competitive bid process for additional goods and/or services: 4 Need to obtain approvals for procurement of goods and/or services: 10 Other*: 3 My organization does not believe procurement is a barrier: 18
(35 of 52 respondents answered)	

*Respondents who chose "Other" were able to free-type were able to free-type their answer, listed here: • "Need current system to develop a positive response program" • "need someone to contact us about this program and requirements…"

19. Please provide specifics on the option(s) you selected*:
(10 of 52 respondents answered)

*Survey respondents were able to free-type their answers, listed here: • "The system we use does not currently offer positive response, but the system developer is working to resolve the issue." • "Need someone to contact us on the requirements for this request" • "We are not clear on what we need to do to comply with the new system" • "Need to source 3 or more bids and the personnel to complete that." • "Need justifications." • "See question 16 answers." • "We need to select the system."

20. Are there any other reasons your organization would be unable to provide electronic positive response for all tickets by January 1, 2021? *(43 of 52 respondents answered)*	Yes: 5 No: 38

21. If yes, please provide a detailed explanation: *
(5 of 52 respondents answered)

*Survey respondents were able to free-type their answers, listed here: • "If the company that provides our software-based ticket management program has not implemented a positive response system we will not be able to provide it." • "A one-man operation with limited resources." • "Our member code does not have facilities. We will most likely cease to be members" • "Depending on the cost of the system, we may need a special budget authorization which would come as part of the FY22 (July 1, 2021 to June 30, 2022) operation budget. Also, we are a small shop with lots of other demands on our time so we may need more time."

22. Is there anything else you would like to add? *
(30 of 52 respondents answered)

*Survey respondents were able to free-type their answers, listed here: • "PG&E supports EPR and AB 1166" • "There appears to be a multitude of possible response options that we have yet to sort through and match to our system responses" • "I believe an extension to the deadline should be implemented to allow all agencies enough time for compliance." • "It would have been nice if this requirement would have stayed optional. For utilities like us that are so small and unusually busy and spread thin, it's more of a hassle to have to respond electronically. It would be pose an additional hassle to log on to the one call center to check other utilities' EPRs. We usually just go out and manually check to see if all the parties on the ticket have marked their utility lines or if there is a conflict." • "More information available to switch over would be super" • "We have just submitted our shape file to USA 811, and we receive very little Stake It Notice Tickets. The tribe pretty much has all the utilities on the reservation accept Southwest Gas, has facilities on the reservation." • "We would like to request an extension due to the fact that we may be completing our remediation project soon." • "Yes, again can you please give me a link to go to, were I need to go, and how does it work. Thanks" • "will get working on it" • "Personally your system is useless to me as a rural water and wastewater operator, in fact, paying annual dues is a burden to us" • "Need information about how to go to positive response" • "Not at this time. Overall I believe we can comply with the Electronic Positive Response deadline." • "Not at this time." • "We would like more guidance on the systems and their cost. It a lot of work for a small city to figure this out on our own."