

September 22, 2015

The Honorable Bill Shuster
Chairman
Transportation & Infrastructure Committee
United States House of Representatives
2251 Rayburn House Office Building
Washington, DC 20515

The Honorable Peter DeFazio
Ranking Member
Transportation & Infrastructure Committee
United States House of Representatives
2134 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Shuster and Ranking Member DeFazio,

As leaders of the House Transportation and Infrastructure Committee who will be leading the way on the Pipeline and Hazardous Materials Safety Administration (PHMSA) reauthorization legislation this fall, the Alliance for Innovation and Infrastructure (Aii) respectfully requests you pay special attention to the primary cause of pipeline incidents in the United States – excavation damage.

As you know, there are more than 300,000 miles of gas transmission lines and over two million miles of gas distribution lines in the United States. While damage to any underground utility can have serious repercussions, this is especially true of gas lines, since they transport explosive natural gas, are highly pressurized in certain areas, and can be found subsurface nearly anywhere.

The primary problem with the current system is a lack of sufficient communication practices, and the industry's slow response to innovative safety technologies that could enhance information sharing. For example, despite significant improvements in GPS and other digital mapping technologies in recent years, incident rates have not improved.

According to PHMSA:

- There were 560 gas line incidents caused by excavation damage over the past ten years (from 2005-2014)
- These incidents accounted for:
 - o 35 fatalities
 - o 127 injuries
 - o \$125 million in property damage

Improvements are crucial to prevent future incidents. Increased use of the best available locating and mapping technologies, improved communication between all parties (including utilities, excavators, locators), and stronger regulatory enforcement will go a long way in reducing the frequency and severity of incidents.

We realize PHMSA has oversight authority, and states are responsible for creating, implementing, and enforcing their own Damage Prevention programs. To provide states the information they need to strengthen their programs, we request that a provision is included in the reauthorizing legislation, requiring PHMSA to perform a study analyzing the following:

- The frequency and severity of excavation damage incidents caused by:
 - o Poor locating practices
 - o Poor excavation practices
 - o Poor communication between the excavator, the locator, and the state's respective One-Call center
- Current state laws, regulations, and One-Call center best practices regarding communication and information sharing requirements
- A comparison of the frequency and severity of excavation damage incidents in states with positive response requirements when compared to states with no positive response requirements
- If the increased use of GPS digital mapping technologies, mobile devices, easily shareable digital map images, and other advanced communication technological advancements made since the "Dial Before You Dig" Campaign began in 2007 could reduce the frequency and severity of incidents caused by excavation damage

We believe a well-researched, non-biased, federal government study will provide a significant amount of meaningful, new information and data that state regulators and safety non-profits, such as Aii, could use to encourage and implement safer and more technologically advanced damage prevention programs.

The 811 program was a great start, but now ten years later, it is important to strengthen this foundation to improve safety and reduce the likelihood of future pipeline incidents. After all, why use 20th century technologies to combat 21st century safety challenges?

Thank you in advance for your consideration. Should you have any questions or wish to discuss PHMSA reauthorization further, please do not hesitate to call me or my office at (202) 446-7220 or (703) 663-6766, respectively, or email me at sskelton@aiiwire.org.

Sincerely,



Shane Skelton