

Office of Pipeline Safety

MS216D One-Call Revision Survey



Minnesota Department of Public Safety
Office of Pipeline Safety
ops.dps.mn.gov

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Executive summary

This report contains the results and analysis of the 2023 One Call Revision survey conducted by the Minnesota Office of Pipeline Safety (MNOPS). The survey was open from Nov. 1, 2023, to Nov. 14, 2023. During this period, 473 survey responses were submitted through the online portal. MNOPS emailed the survey directly to its contact list, which includes the stakeholder groups identified in Table 1.

The following is the number of respondents from each of the representative categories.

Represented group		Number of surveys	
Excavator			
Large	75		
Medium	89		
Small	74		
	Total excavator responses	238	
Utility operator			
Large	55		
Medium	36		
Small	34		
	Total utility operator responses	125	
Government		36	
Locator		25	
Gopher State One-Call		7	
Engineering/consulting		19	
Emergency response		14	
Homeowner/landowner		7	
Land surveyor		2	
Total		473	

Table 1. Survey respondents per representative group.

Here is a summary of the results of the survey.

Proposed revision	Number of responses			
	Negative	Neutral	Positive	Total
1 – Definitions	67	219	187	473
2 – Performance reporting	125	210	138	473
3 – Meet notifications	117	212	144	473
4 – Locate underground facility	159	159	155	473
5 – Locate Period and GPS Requirements	56	218	199	473
6 – Electronic White Markings	96	135	242	473
7 – Overall View of Proposed Changes	108	179	186	473

Table 2. Survey number of responses per proposed revision.

Proposed revision	Percentage of responses			
	Negative	Neutral	Positive	Total
1 – Definitions	14%	46%	40%	100%
2 – Performance reporting	26%	44%	29%	100%
3 – Meet notifications	25%	45%	30%	100%
4 – Locate underground facility	34%	34%	33%	100%
5 – Locate period and GPS requirements	12%	46%	42%	100%
6 – Electronic white markings	20%	29%	51%	100%
7 – Overall view of proposed changes	23%	38%	39%	100%

Table 3. Survey percentages per proposed revision.

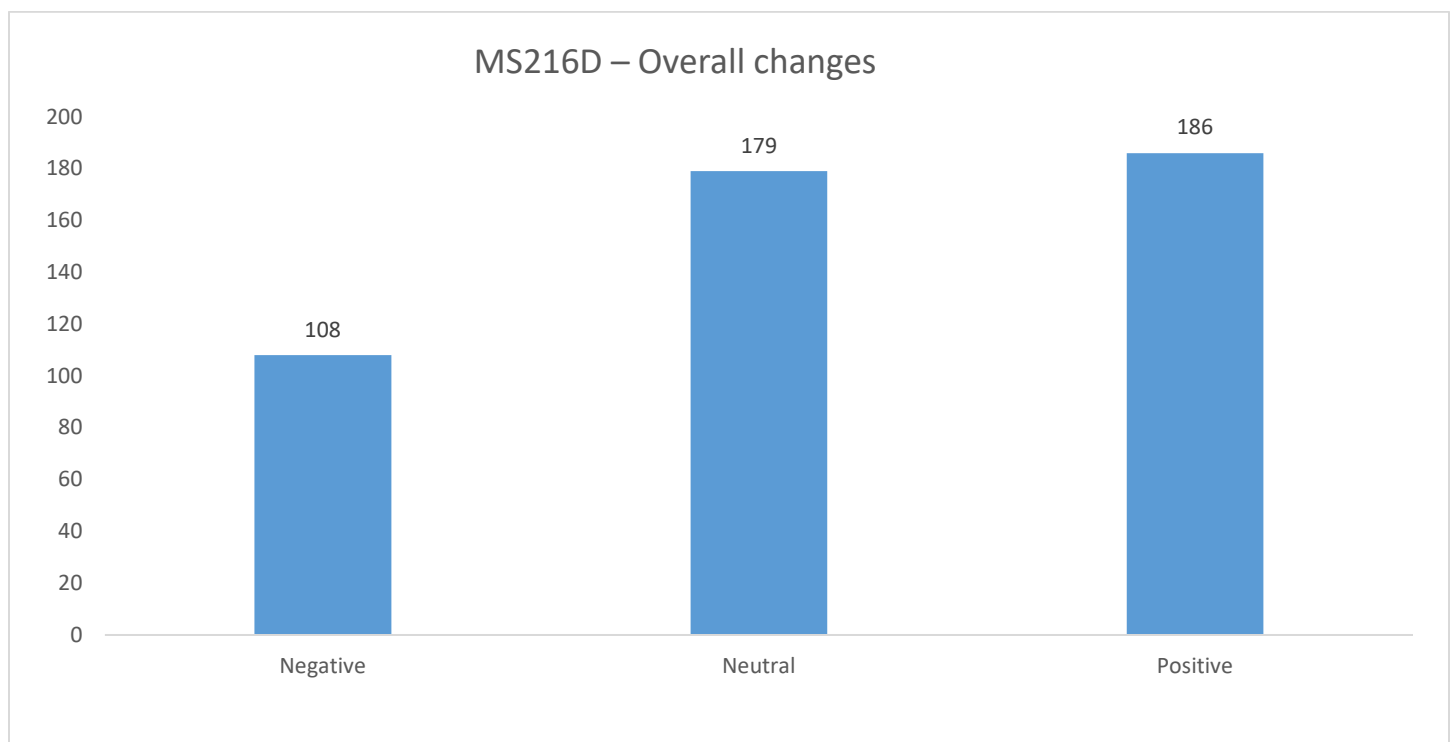


Figure 1: Number of responses per option based on overall reaction to proposed rule changes.

1 - MS216D.01 definitions

Proposed change:

MNOPS is proposing changes to [MS216D.01](#) to incorporate several definitions to the statute. The revised language reads as follows:

Subd. 8. Locate. “Locate” means an operator’s markings of an underground facility showing the approximate horizontal location, including all lines, routes, intersections, tees and service laterals.

Subd. 9. Locate Period. “Locate Period” means the later of:

- (1) The forty-eight-hour period beginning at 12:01 a.m. of the day after the notification request was submitted to the notification center; excluding any Saturday, Sunday, or holiday; or
- (2) The period between the submission of a notification request to the notification center and the noted date and time of excavation.

Subd. 10. Meet. “Meet refers to a meeting at the site of a proposed excavation requested at the time of notice by the excavator with all affected underground facility operators to further clarify the precise geographic location of excavation, schedule the locating, propose future contacts, and share other information concerning the excavation and facilities.

Subpart 14. Public right-of-way. “Public right-of-way” means the area on, below, or above a public roadway, highway, street, cartway, bicycle lane, and sidewalk in which government unit has an interest, including other rights-of-way dedicated for travel purposes and utility easements of government units.

Subpart 16. Utility quality level. “Utility quality level” means a professional opinion about the quality and reliability of utility information. There are four levels of utility quality information, ranging from the most precise and reliable, level A, to the least precise and reliable, level D. The utility quality level must be determined in accordance with guidelines established by the Construction Institute of the American Society of Civil Engineers in document [CI/ASCE 38-22](#) entitled “Standard Guidelines for the Collection and Depiction of Existing Subsurface Utility Data.”

Rationale:

The proposed addition of the definitions noted above is necessary to build out the overall proposed changes to MS216D. These definitions aim to define what an operator utility locate is, in addition to the timeframe in which a utility company must locate underground facilities in response to a notification request. Additionally, the definition of “meet” from [Minnesota Rules 7560.0100](#) was added into the MS216D statute. These proposed definitions are highlighted throughout the remainder of this document.

Survey results:

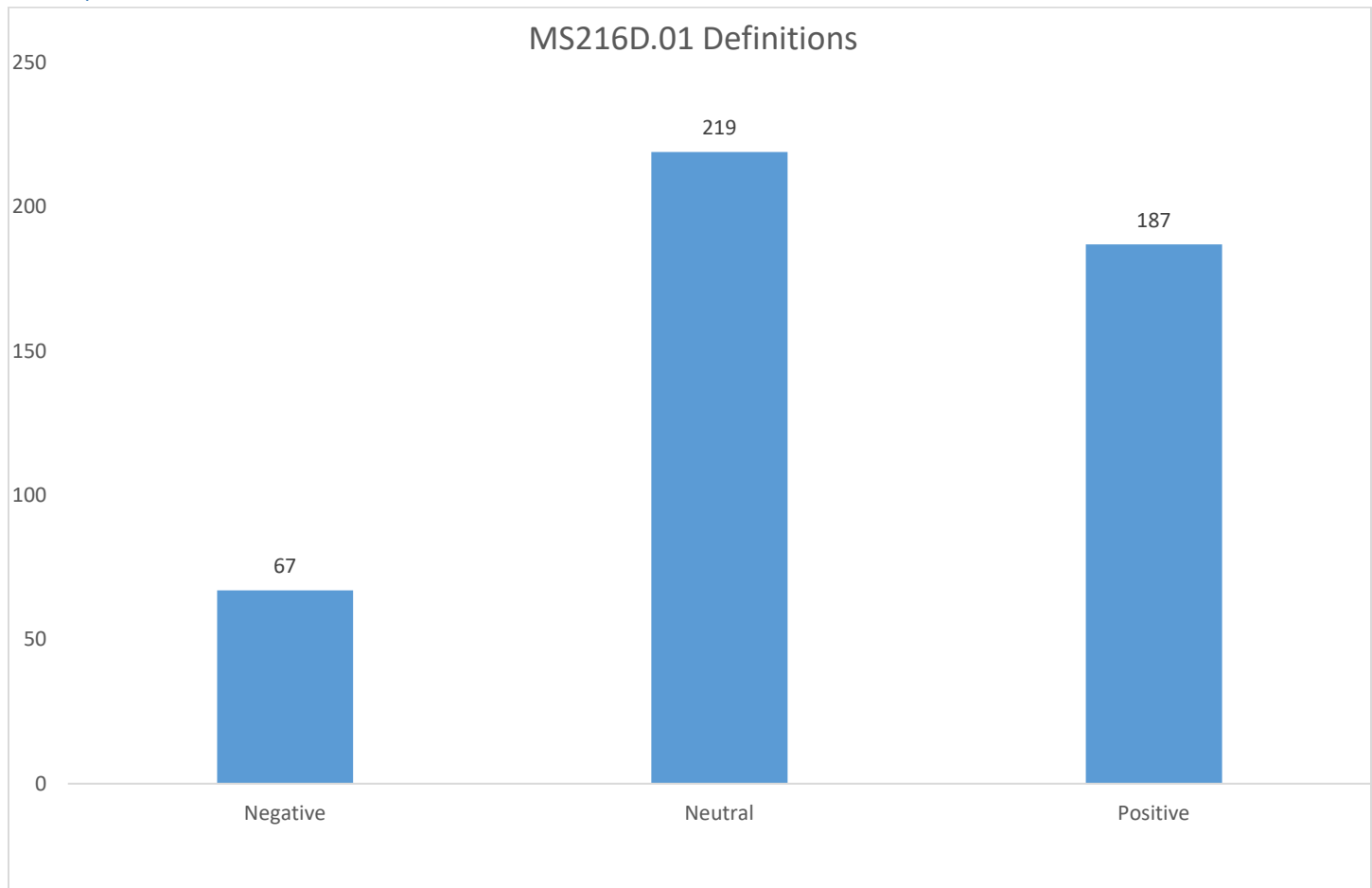


Figure 2. Number of responses per option regarding the proposed revisions to MS216D.01 definitions.

Represented group	Number of responses		
	Negative	Neutral	Positive
Emergency response	0	9	5
Engineering/consulting	1	5	13
Excavator	49	109	80
Gopher State One-Call	0	5	2
Government	1	19	16
Homeowner/landowner	1	2	4
Land surveyor	0	2	0
Locator	4	4	17
Utility operator	11	64	50
Total	67	219	187

Table 4. Number of responses per option regarding the proposed revisions to MS216D.01 definitions.

Survey comments:

MNOPS received 26 comments regarding the proposed change related to definitions. The survey number and associated comment submitted are listed in Table 12. Comments on Definitions.

2 - MS216D.03 Notification center – performance reporting

Proposed change:

MNOPS is proposing adding a Subd. 5 to [MS216D.03](#) with the following language:

Subd. 5. Excavation notice system performance reporting.

(a) Each operator must submit a report to the Office of Pipeline Safety on a quarterly basis, using a form or database entry designated by the Office of Pipeline Safety. The report must contain the following information:

- (1) the total number of notifications and the number of notifications itemized by type;
- (2) for each notification type, the percentage of notifications marked by the start time on the notice; and
- (3) the number of utility damages, itemized by the cause of the damages.

(b) An operator, other than a pipeline operator subject to chapter 299F or 299J, with fewer than 5,000 notifications received during the previous calendar year is exempt from the reporting requirement under paragraph (a).

(c) The data collected under this section may not be used to initiate an enforcement action by the Office of Pipeline Safety.

Rationale:

Currently, there are no statutorily required performance metric requirements in MS216D. These performance metrics will allow MNOPS to track industry trends, ensuring marking notification requests are completed in a timely manner, as well as tracking damages to underground utilities. This data is vital to determine the status of the Gopher State One-Call system and determine if there are future needed changes.

Survey results:

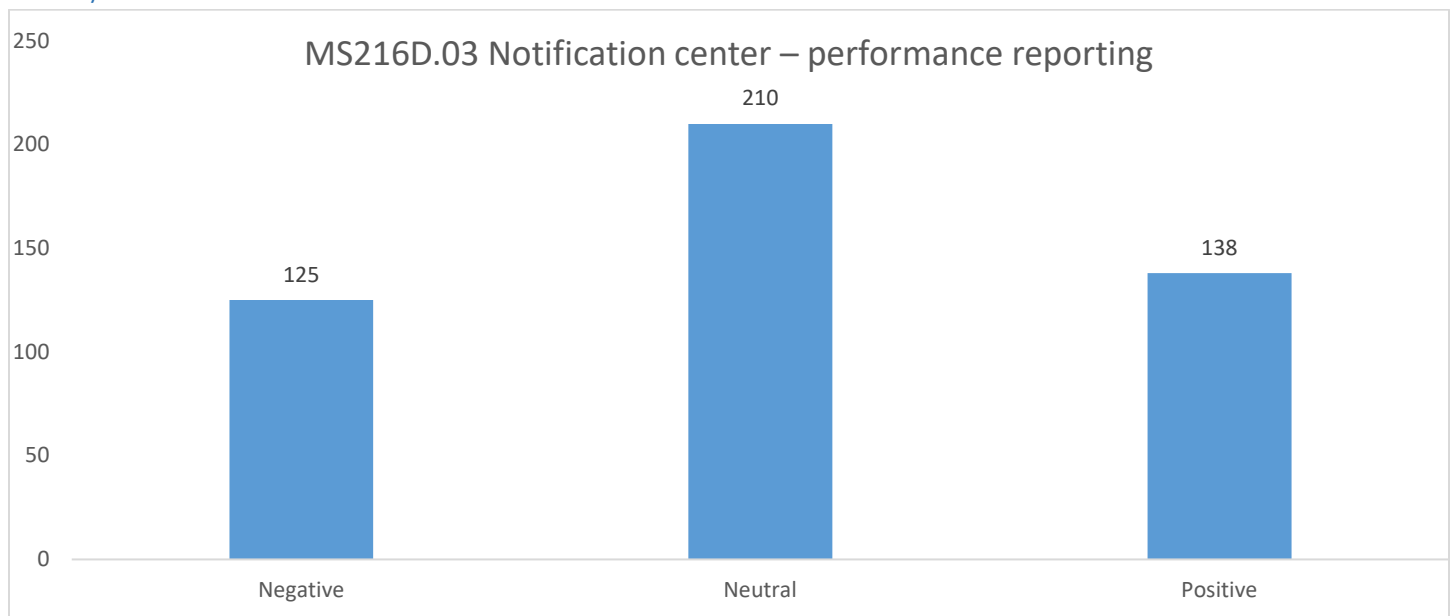


Figure 3. Number of responses per option on performance reporting.

Represented group	Number of responses		
	Negative	Neutral	Positive
Emergency response	2	8	4
Engineering/consulting	1	12	6
Excavator	55	115	68
Gopher State One-Call	1	5	1
Government	10	12	14
Homeowner/landowner	0	1	6
Land surveyor	0	1	1
Locator	1	11	13
Utility operator	55	45	25
Total	125	210	138

Table 5. Number of responses per group on performance reporting.

Survey comments:

MNOPS received 21 comments regarding the proposed change related to performance reporting. The survey number and associated comment submitted are listed in Table 13. Comments on Performance Reporting.

3 - MS216D.04 Excavation; land survey – meet notifications

Proposed change:

MNOPS is proposing the addition of Subd. 1b. Pre-construction Meet Notifications to [MS216D.04](#) to make meet requirements within the statute while adding requirements to the existing rule in [7560.0350](#). The revised language reads as follows:

Subd. 1b. Pre-construction Meet Notifications.

(a) An excavation notification that involves excavation in a 1 mile square area or 1 mile length, shall require a meet. A meet may be requested for any excavations at the discretion of the excavator. The meet notification must include the entire geographic area of the proposed excavation and the specific location of the meet. An excavator shall be prohibited in the submittal of notifications in separate smaller adjacent geographic sections to bypass this requirement.

(b) The excavator must provide a precise geographic area of the proposed excavation and use physical or electronic markings to detail the location of work.

(c) An affected operator shall attend the meet at the proposed date and time, or contact the excavator before the meet and reschedule for a mutually agreed date and time. The operator shall come to an agreement with the excavator at the time of the meet to establish a locating schedule for the duration of the meet notification.

(d) The meet date and time shall occur at least 72 hours after the notice, excluding Saturdays, Sundays, and holidays. The excavation start time must be at least 48 hours after the proposed meet date and time specified on the notice, excluding Saturdays, Sundays and holidays.

(e) The meet shall be documented. The notification center shall provide the means for the excavator and affected facility operators to document each meet. The documentation must include:

(1) The date and time of meet;

(2) The names, company affiliations, and contact information of the attendees of each meet;

(3) A diagram, sketch, or description of the precise excavation locations, dates, and times; and

(4) The agreed schedule of any future meets or communications.

Rationale:

This proposed revision expands on the current excavation meet requirements in Minnesota Rule [7560.0350](#). The proposal requires that larger projects utilize meet tickets to facilitate the scheduling of utility marking throughout the duration of complex projects. In addition, the proposal requires documentation for agreed marking schedules to be retained by the notification center. The expanded timeframe in the proposed language allows utility companies to schedule work and respond to the notification requests.

Survey results:

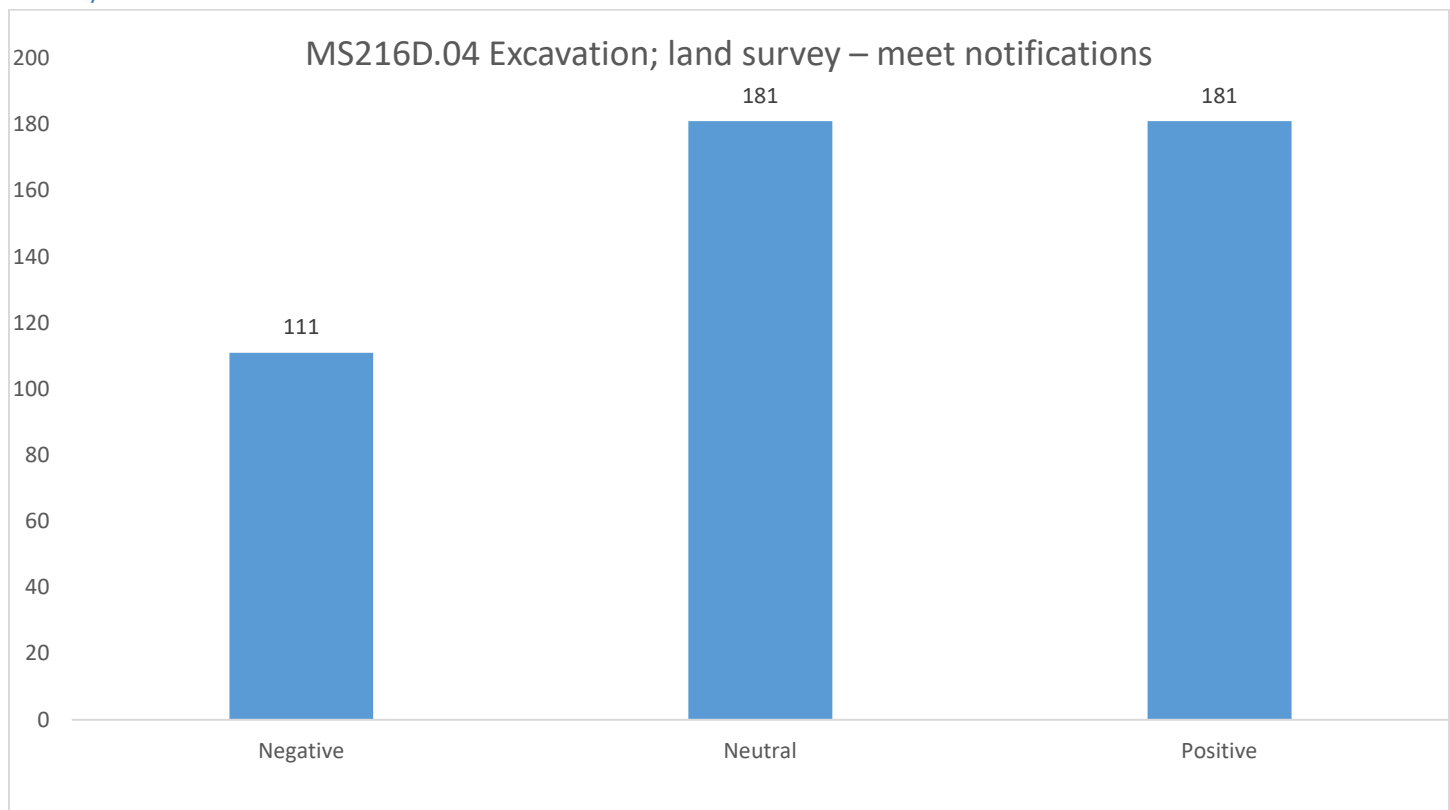


Figure 4. Number of responses per option on meet ticket notification.

Represented group	Number of responses		
	Negative	Neutral	Positive
Emergency response	1	6	7
Engineering/consulting	2	7	10
Excavator	70	99	69
Gopher State One-Call	1	5	1
Government	4	13	19
Homeowner/landowner	0	3	4
Land surveyor	1	1	0
Locator	1	7	17
Utility operator	31	40	54
Total	111	181	181

Table 6. Number of responses per group on meet ticket notification.

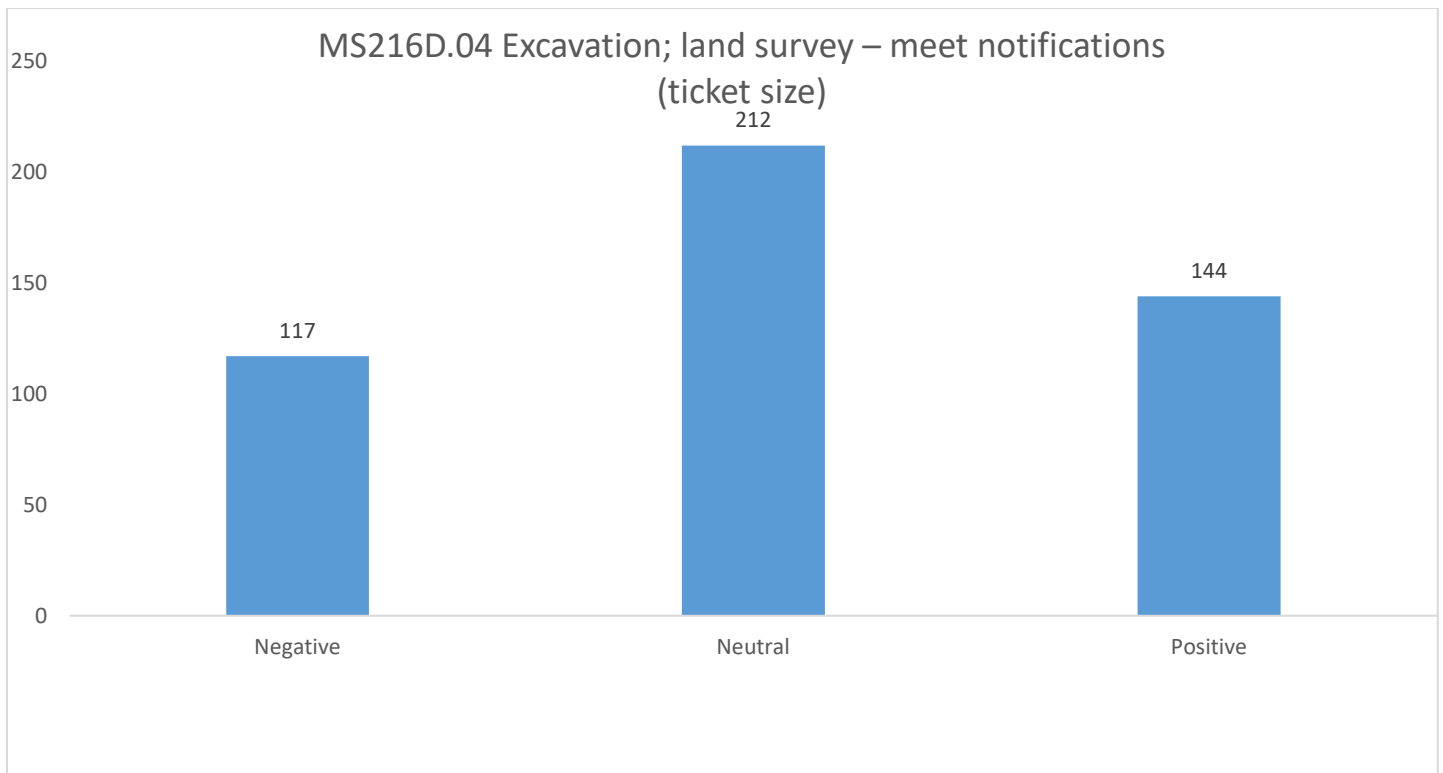


Figure 5. Number of responses per option on meet ticket size.

Represented group	Number of responses		
	Negative	Neutral	Positive
All Groups	117	212	144

Table 7. Number of responses per group on meet ticket size.

Survey comments:

MNOPS received 24 comments regarding the proposed change related to meet notifications. The survey number and associated comment submitted are listed in Table 14. Comments on Meet Notifications.

4 - MS216D.04 Excavation; land survey – locate underground facility

Proposed change:

MNOPS is proposing changes to Subd. 1 of [MS216D.04](#) to require notification be made by an excavator at least 48 hours prior to excavation, excluding the day of notification, instead of the current 48 hours. The revised language reads as follows:

Subdivision 1. Notice required; contents. (a) Except in an emergency, an excavator shall and a land surveyor may contact the notification center and provide notice at least 48 hours, excluding the day of notification, Saturdays, Sundays, and holidays and not more than 14 calendar days before beginning any excavation or boundary survey. An excavation or boundary survey begins, for purposes of this requirement, the first time excavation or a boundary survey occurs in an area that was not previously identified by the excavator or land surveyor in the notice.

Rationale:

Since 2019, MNOPS has responded to increasing complaints regarding the ability of utility operators meet the 48 hour notification time, especially during peak periods with high notification ticket volume. The proposed increase in time allows utility operators to respond to notifications more effectively and efficiently.

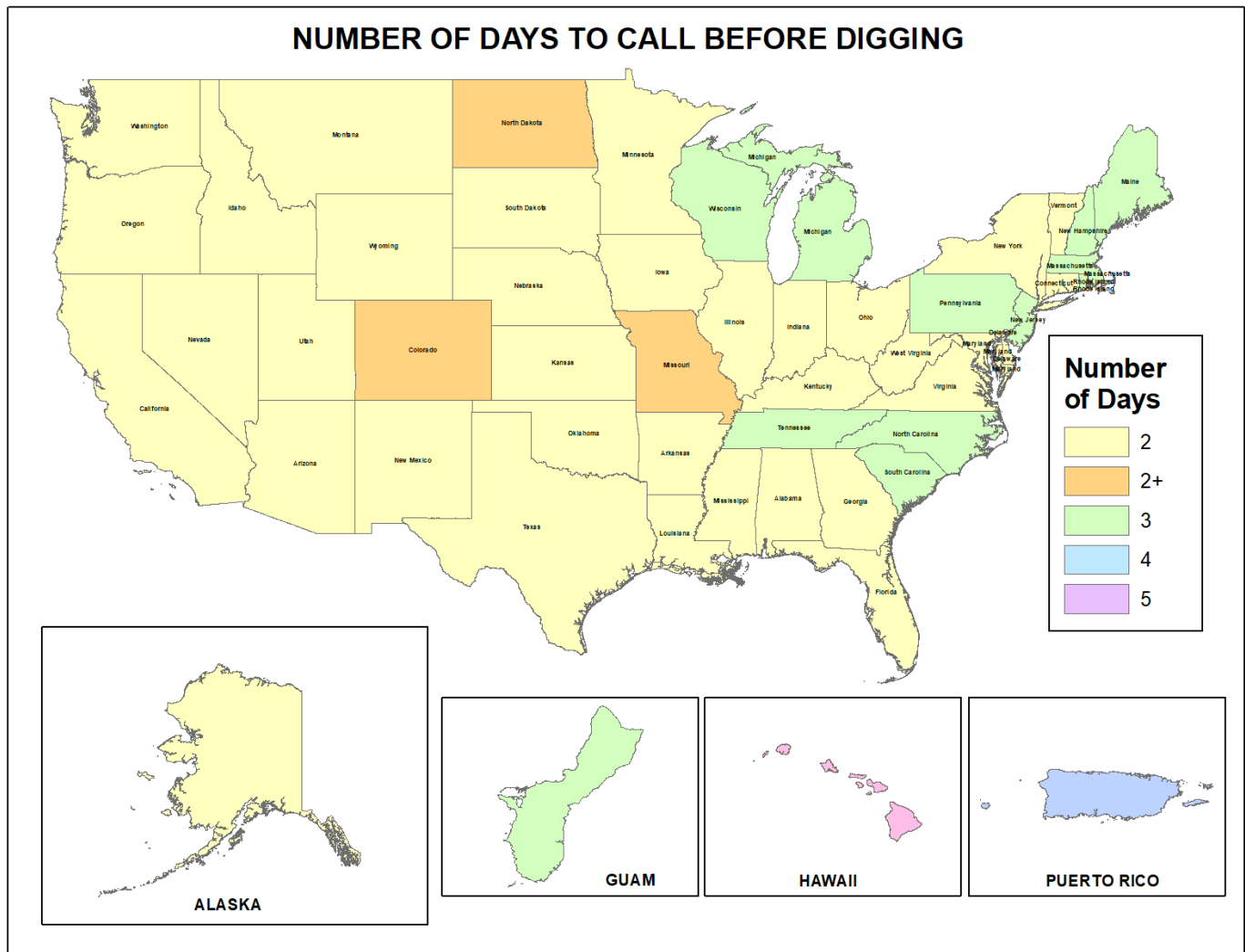


Figure 6. Map with number of days to call before digging.

Survey results:

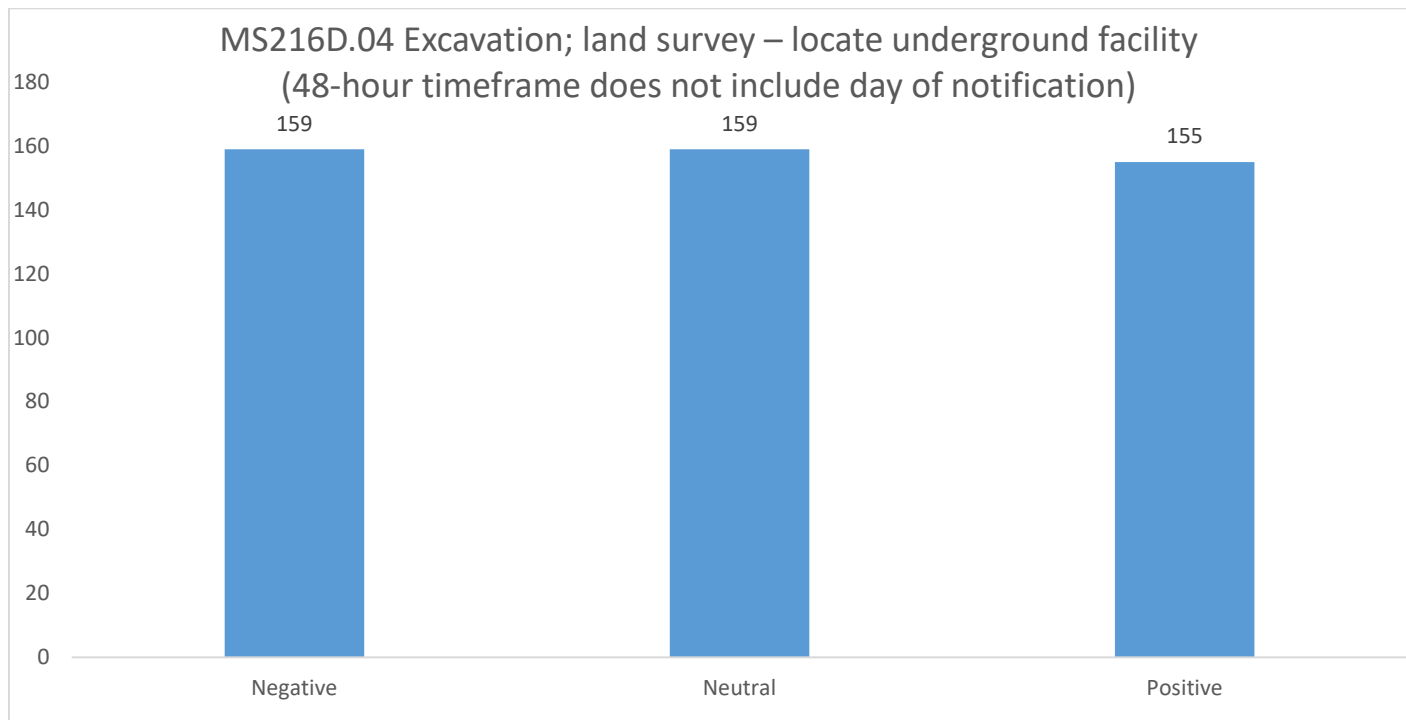


Figure 7. Number of responses per option on locate underground facility.

Represented group	Number of responses		
	Negative	Neutral	Positive
Emergency response	1	8	5
Engineering/consulting	6	8	5
Excavator	132	68	38
Gopher State One-Call	2	4	1
Government	2	16	18
Homeowner/landowner	0	2	5
Land surveyor	0	2	0
Locator	2	3	20
Utility operator	14	48	63
Total	159	159	155

Table 8. Number of responses per group on locate underground facility.

Survey comments:

MNOPS received 29 comments regarding the proposed change related to locate underground facility. The survey number and associated comment submitted are listed in Table 15. Comments on locate underground facility.

5 - MS216D.04 Excavation; land survey – locate period and geospatial information

Proposed change:

MNOPS is proposing changes to MS216D.04 Subd. 3 (a) to define the notification locate period and adding a new Subd. 3 (g) to require utility operators to maintain geospatial information on newly installed utilities and abandoned utilities. The current language for Subd. 3 (g) will remain unchanged and be moved to Subd. 3 (h). The revised language reads as follows:

- (a) The locate period shall define ~~Prior to~~ the excavation start time on the notice, ~~where~~ an operator shall locate and mark or otherwise provide the approximate horizontal location of the underground facilities of the operator and provide readily available information regarding the operator's abandoned and out-of-service underground facilities as shown on maps, drawings, diagrams, or other records used in the operator's normal course of business, without cost to the excavator. The excavator shall determine the precise location of the underground facility, without damage, before excavating within two feet of the marked location of the underground facility.
- (g) An operator shall maintain geospatial location information of any newly installed underground facility or abandoned facility in the public right-of-way after December 31, 2026.
- (h) An operator or other person providing information pursuant to this subdivision is not responsible to any person, for any costs, claims, or damages for information provided in good faith regarding abandoned, out-of-service, or private or customer-owned underground facilities.

Rationale:

Since 2019, MNOPS has responded to increasing complaints regarding the ability of utility operators meet the 48-hour notification time, especially during peak periods with high notification and ticket volume. The proposed increase in time allows utility operators to respond to notifications more effectively and efficiently.

Additionally, the proposed change aims to require utility operators to acquire GPS quality level information of its utilities after Dec. 31, 2026, and maintain that information moving forward. The change increases the accuracy of information used by utility companies to mark underground lines. Inaccuracies in this information can lead to mismarking the location of the underground utility, failing to mark the utility, or incompletely marking the utility.

Survey results:

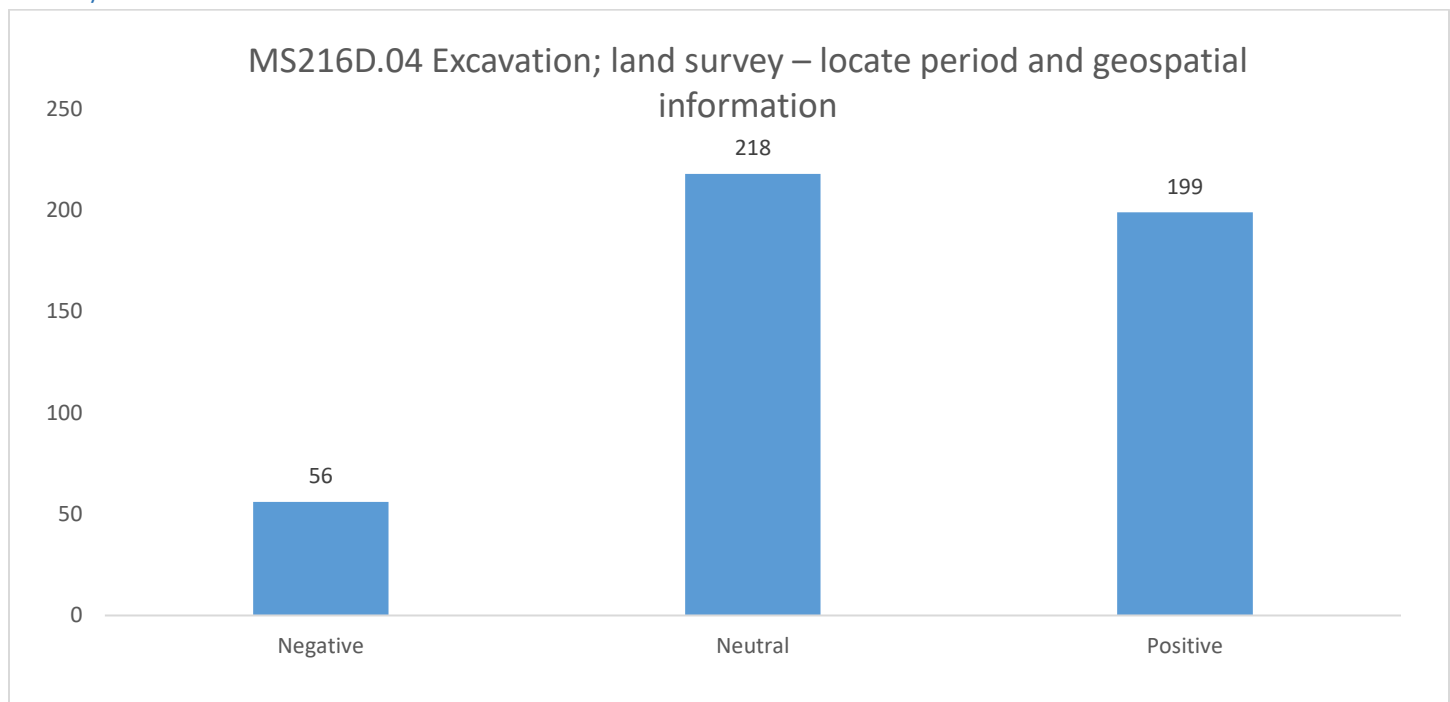


Figure 8. Number of responses per option on locate period and geospatial information.

Represented group	Number of responses		
	Negative	Neutral	Positive
Emergency response	1	7	6
Engineering/consulting	1	4	14
Excavator	31	110	97
Gopher State One-Call	0	6	1
Government	4	11	21
Homeowner/landowner	1	2	4
Land surveyor	0	2	0
Locator	2	8	15
Utility operator	16	68	41
Total	56	218	199

Table 9. Number of responses per group on locate period and geospatial information.

Survey comments:

MNOPS received 35 comments regarding the proposed change related to locate period and GPS requirements. The survey number and associated comment submitted are listed in Table 16. Comments on locate period and GPS requirements.

6 - MS216D.05 Precautions to avoid damage – allow for digital white marking

Proposed change:

MNOPS is proposing a change to section (2) of [MS216D.05](#) requiring excavators to place white markings, either physically or electronically for proposed excavations. The revised language reads as follows:

[DELETE: (2) use white markings for proposed excavations except where it can be shown that it is not practical;]
ADD THE FOLLOWING:

(2) use physical or electronic white markings for proposed excavations;

Rationale:

White marking proposed excavations allows for a greater level of safety and locate accuracy when an excavation ticket is submitted. Complaint investigations by MNOPS have shown that current compliance rates with this requirement is still low. The proposed change to MS216D.05 section 2 White Marking will allow the option for excavators to use digital marking to complete this requirement giving locators an onsite visual or an electronic confirmation of the planned excavation on excavation tickets. The change also removes the “when practicable” component of the regulation, which has historically caused unnecessary confusion.

Survey results:

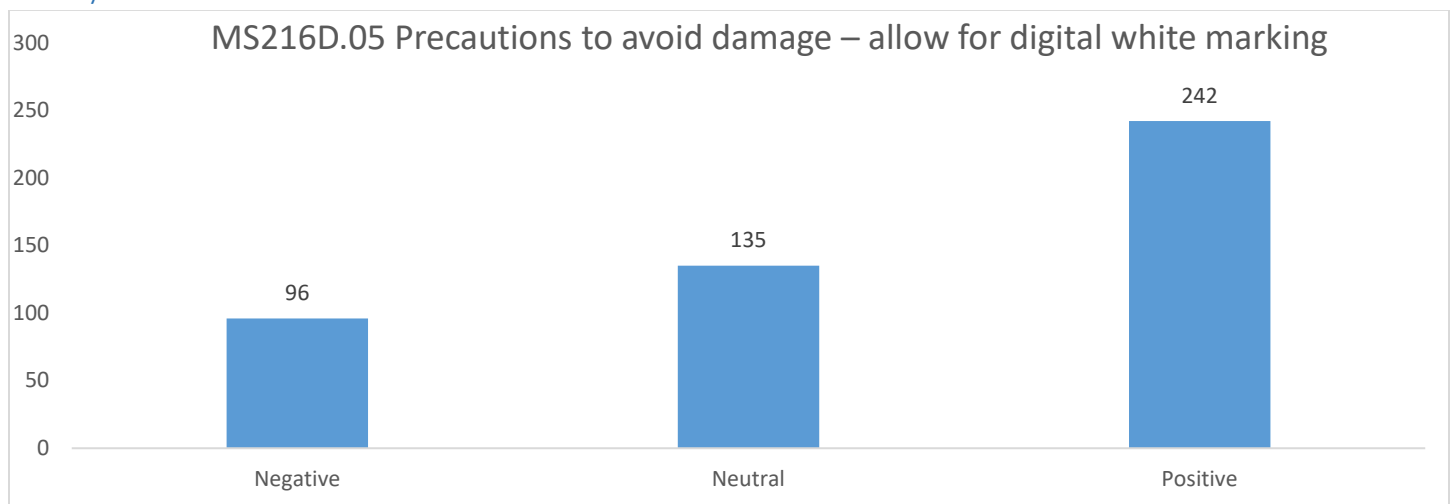


Figure 9. Number of responses per option on white marking.

Represented group	Number of responses		
	Negative	Neutral	Positive
Emergency response	3	7	4
Engineering/consulting	2	7	10
Excavator	58	73	107
Gopher State One-Call	1	2	4
Government	5	14	17
Homeowner/landowner	0	2	5
Land surveyor	0	0	2
Locator	5	3	17
Utility operator	22	27	76
Total	96	135	242

Table 10. Number of responses per group on white marking.

Survey comments:

MNOPS received 29 comments regarding the proposed change related to digital white marking. The survey number and associated comment submitted are listed in Table 17. Comments on digital white marking.

7 - MS216D – Overall changes

Survey results:

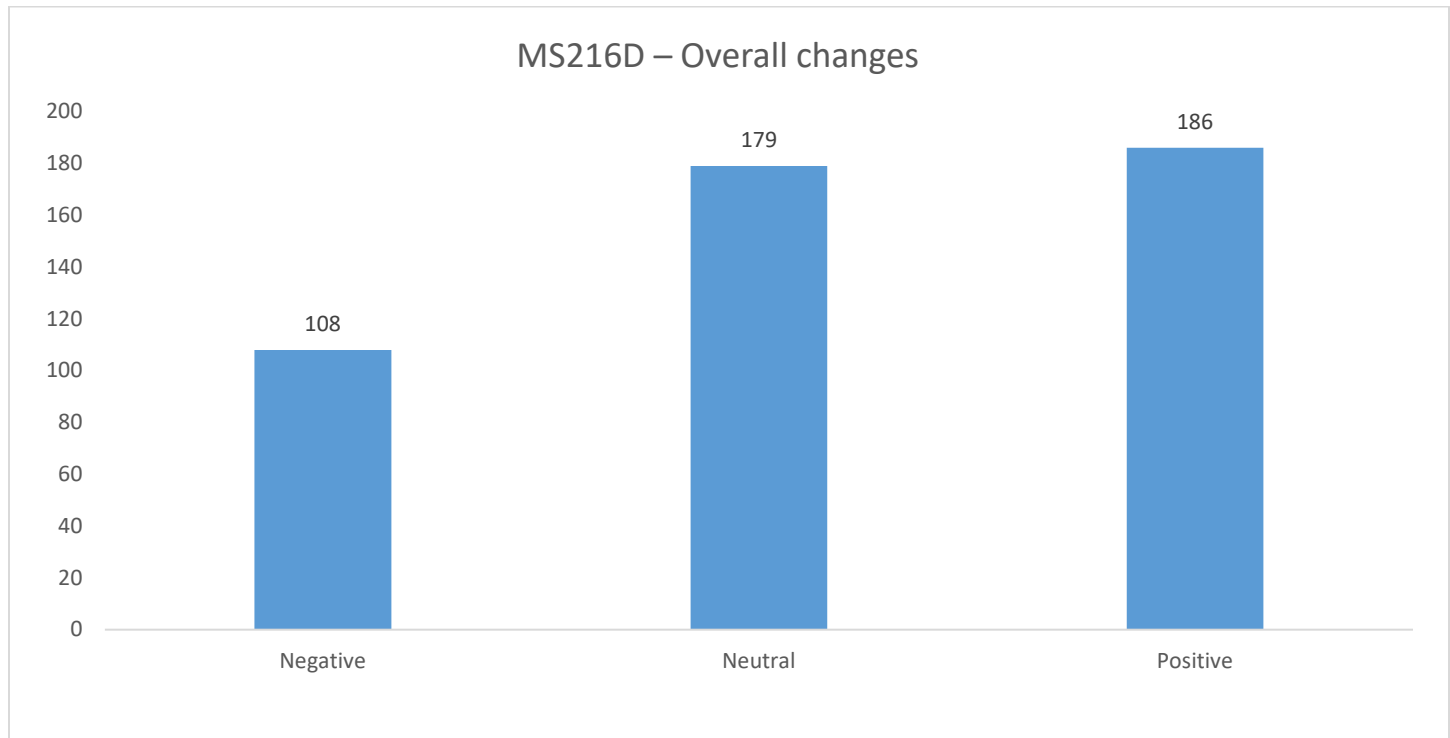


Figure 10. Number of responses per option on damage reporting.

Represented group	Number of responses		
	Negative	Neutral	Positive
Emergency response	0	9	5
Engineering/consulting	2	5	12
Excavator	59	106	73
Gopher State One-Call	1	4	2
Government	3	14	19
Homeowner/landowner	0	2	5
Land surveyor	0	2	0
Locator	3	4	18
Utility operator	40	33	52
Total	108	179	186

Table 11. Number of responses per group on damage reporting.

Survey comments:

MNOPS received 116 comments regarding the proposed overall changes. The survey number and associated comment submitted are listed in Table 18. Comments on Overall Changes.

Survey comments — detail

Table 7. Comments on definitions

Survey #	Comments on definitions
307	whats wrong with 48 hours from ticket submission?
308	What does these changes do to the existing definitions in Subd. 8 Notification Center, Subd. 9 Operator, and Subd. 10 Person?
317	Meet should indicate that this does not include of putting paint on the ground. Many times excavators are expecting paint to be put on the ground with a meet ticket same day.
323	I am seeing more problems with utility.company's putting their stuff next to the shoulder instead.of at the backslope. This is getting to be a large problem for me because I install signs. Probably not your problem but just noticing how full the ditches are becoming,
331	I do have concerns about smaller excavators and homeowners getting frustrated and not calling due to the added time. Those who watch the weather before deciding to excavate on a weekend project will find the added time to be a negative issue.
351	The 48 hour period should start when the 811 located ticket was submitted excluding any Saturday, Sunday or holiday.
362	The 48 hour should still begin after the locate ticket was submitted.
367	Most utility operators, use third-party locate companies to locate their utilities now. They can hire more locators to service their lines. There is zero standardization for how/where an operator installs a new line, with no regard to excavating companies and how the deeper pipes can safely be installed. Literally no standardization. And the excavating company always has to pay for any hit, even downtime is on the excavating company to pay, because all operators pass the buck.
370	I like the current status of the 48-hour period starting when you call the ticket in.
372	The time period is tricky, I'm not sure what's wrong with the current 48 hour notice with a starting clock of when it's put in.
396	These make sense and will provide additional clarity.
409	DON'T KNOW. YOU HAVEN'T SHOWN THE PRIOR VERBAGE.
410	Only positive if locating quality improves.
415	This will make locating quite a bit more efficient and save on costs for everybody.
419	Only a positive if the additional time improves the quality of the locate.
424	Don't want to see locate tickets extended out further than 48 hours.
427	I think that the 48 hour period should remain from the time called in, though to help the locators, I would recommend training on being a bit more specific in regards to area requested. One of my locators said it is very frustrating to mark the right of way for a quarter section (0.5 miles square, would be a mile of locating) and then see one short line or repair was the extent of the digging, which could have been safely made more specific.
436	Locate Period - By allowing additional time will we receive more accurate locates?
439	Public right-of-way should include alley and/or alleyway.
443	Would like to see the definition of "locate" also include approximate vertical locations, and the requirement to also mark nipples, blowoffs, stubs and valves.
445	Waiting until 12:01 can add an extra day.
455	IT SHOPULD REMAIN 48 HOURS AFTER LOCATE CALLED IN.
472	<p>Subd 9. (2) . This can be problematic if they have up to the last minute of excavation date. I have been called out to the field many times because an unexpected line marking conflicts and the contractor is waiting to start. This timing has a cost taxpayers and lost time to excavators. This should be 24 hours prior to "noted date and time of excavation." if you really want to reduce field conflicts and re-design issues.</p> <p>Subp. 14 My City used the same definition but adds "outlots, parks and drainage and utility easements." Also, a public right of way includes green or unmaintained spaces where underground may be located. New developement plats typically have easments surrounding each lot (5' to 20' wide) for access/utility. These should be discussed to</p>

	determine legal access by telecoms and also their eventual abandonment within in an easement on private property as this becomes a hardship for the residential owner.
474	the 12:01 am change would be a game changer for our industry in MN.
476	We need further discuss on the negative impacts of marking tees and service laterals and what that would look like for abandoned facilities. In the instance of an abandoned line, we may not have the means to accurately locate it. This may be a big part of why we are abandoning it. When marking tees on our live facilities we will need to do this by measurements which will increase the time it takes to locate a ticket. We already struggle with workload demands. This will slow our work force down. This activity is redundant as there is a 2' hand dig zone. This does not add to damage prevention.
477	While the 48-hours starting at 12:01 the next day is an adjustment it is one we have successfully adapted to in other states. It will provide some additional buffer time for the locating resources to accommodate peak request days and if managed correctly should improve overall on time performance. As an excavator I would expect the tradeoff for this change to be more aggressive and consistent enforcement by MNOPS than we have seen in the past when the operator/locator fail meet the deadline.

Table 13. Comments on performance reporting

Survey #	Comments on performance reporting
307	works for me, keep track of the outfits that cant stop hitting things.
310	Why do we need to collect this data? Seems like adding paperwork, which requires staff time, which adds cost to operations. Item (c) indicates that the data may not be used to initiate enforcement, so what is it for? We do not support the creation of more paperwork and reporting burden. If data can be gathered by the One Call system without operator effort, then I would switch from "negative" to "neutral". I am not in favor of additional government initiated paperwork.
312	I don't need more paperwork to do with my business! You all can see what I turn in for locates!!
317	Could be very beneficial for MNOPS to see the cause of damages and focus on the changes with that data.
326	Seems like alot of additional work, but if it helps to lesson the amount of damage to existing facilities, it may be worth it.
351	It will be hard for large excavation companies to keep track of how many tickets are called in each year.
370	Un-needed paperwork for operators so a state employee can justify their job and waste my taxpayer dollars. OPS needs to enforce the current laws with some backbone instead of a slap on the wrist before they create new laws.
371	We are exempt from this.
372	This may make the locators start being held more accountable. Right now there are many who aren't very good to be quite honest.
373	It would help for someone to see that the utilities are not always marked prior and some never are even after the start time of the tickets.
396	We do not oppose performance reporting. However, there are concerns with how this section is written. In general, this section needs more development and consideration before adoption. (1) The total number of notifications, notification type, and timeliness of locates is something that GSOC should be able to provide since Operators are providing positive response back to the center. We work with other centers that utilize the data/responses they receive to generate performance reports instead of having each individual operator complete their own report. Instead, if adopting this, the focus should be on GSOC creating a report using the positive reponse, and the operators validating the results. Then there would need to be a dispute process for results which are not accurate as inaccurate results could have negative impacts on operators in MN. (2)No concerns with damage reporting. (3) This section does not specify if/how this could be viewed by the public.
418	Only getting one side of the story.
425	There is two big phone companies that you can't even get in contact
427	I appreciate that his does not result in enforcement, as I think that will encourage honest reporting.

428	I do not gather this information on a daily basis and have no current way to keep track of this information easily. If this is to become a required duty of mine, I would need a simple way to track the information required with guidelines of notification types. I do not track the percentage of notifications marked by the start time. This seems like something the GSOC system should be able to track.
465	What is MNOPS going to do with the data if "enforcement action" may not be initiated due to the data entered? The data should be used to point out what areas of the state, what contractors, owners, and operators need more attention and inspection.
472	Can date reporting be broken down into City or County and provided to the respective City or County Engineer. Data helps us understand the impacts of locators, operators and excavators.
474	I don't feel this would assist in damage prevention.
476	The completed-on time definition needs to be defined so all utilities are measured by the same standards. How do we measure this if a company doesn't have the capability of electronic positive response. This It is not required by law.
477	Very much support. Operators (particularly gas operators) have often made it mandatory for their excavation contractors to belong to organizations that require damage reporting. It is only fair they do the same and, in a format, where the data is visible to the contractor community.
482	It appears the Office of Pipeline Safety is creating more work for the utility companies with not much benefit to themselves for all the additional data entry. Utility companies do not want damage done to their lines anymore than the OPS but by making more work for them takes away more resources of theirs to prevent these hit.

Table 8. Comments on meet notifications

Survey #	Comments on meet notifications
317	I think the ability to put marking or "electronic markings" need to be defined better. I also believe that if these are not accurate that the utility/locator should have the ability to request an extension on the ticket until that is done properly.
331	This should help get more meets for these projects.
343	Some put a large area in their requests to cover unknown potential problems if they don't know the area but want more coverage of their digs so this might result in unnecessary meetings.
351	I think this is a great idea because large highway construction projects are very difficult to mark with paint and flags so a digital marking and or map helps a lot.
352	a 5 day window seems a bit lengthy from notifications to start time. though i feel the meet is a good way to clearly communicate the area needing located. Also a good way to acquire locator contacts. The documentation of the meet seems overkill.
367	with 72 hours notice for the meet and another 48 hours after the meet, they can get a head start on marking or hire more locators. the current 48 hours for a meet and 24 hours to mark after the meet is more than enough time to mark as needed. Excavators get the brunt of all changes and it doesn't need to be. Keep it the same.
370	Too long to start. keep the standard time as is.
371	Meet ticket definition is neutral. In my experience, all of this is discussed at the meet now.
372	We generally do locate meets with any of our large projects anyway, but I think renewal tickets should not be held to the same standard. It makes sense to meet for the initial meeting, after that renewal tickets shouldn't require an additional meet.
373	This in no way affects my company.
396	This is a great change which will improve communication for larger projects. This will also help excavators have the best contact for the locators responsible to locate for that project and will improve timeliness by communicating which areas to focus on first.
404	Primarily, our areas are along the highway right of way, and the locations fall between 2 roads/streets. With the meet requirement, this pushes the start of work out to 5 days versus the current 48 hours. In our industry, we are typically given little notice to when the site is ready for subgrade installations, thus the 48 hour timeframe works best.
411	This will just cause more delays.

427	I wonder if there should be an allowance for breaking a square mile into smaller parcels if the areas are identifiable and if each parcel takes significant time (two weeks?) before moving to the next parcel. I would agree that if work begins at multiple points within the square mile simultaneously that the meet should happen.
433	1 Miles is just too large. If the area is 1 mile, then it should be broken up.
436	1 mile of rural highway may not require a meet versus 1 mile through a city with multiple utilities.
438	1b - I don't see the need for "and use physical or electronic markings to detail the location of work." at the time of the Meet. This information is required at the time of locates or future locates. "The excavator must provide a precise geographic area of the proposed excavation" is what is needed at the time of the initial Meet.
450	The meet requirement should also include complexity of the job.
453	I think 1 mile in length is too restrictive. In our case, we replace overhead lines usually 2 to 3 miles at a time and each new pole is staked. With this revision we would have to allocate someone to be on-site for a meeting and wait 5 days to start the project that is clearly marked approximately every 200 feet. My suggestion would be to consider adding an exception for work that is not continuous in nature like road projects, tiling or installing underground facilities are.
465	Indifferent about the length or size requirement as our projects do not always meet that criteria. We have been utilizing locate meets more in attempt to better connect with locators and facility operators to discuss the project scopes and sequencing and proactively identify problem areas.
472	For municipal or transportation construction projects, there is no reference to involving the project design engineer such as City, County, State or Consultant. Conflicts that result in design changes have to be approved by the Engineer. Also, facility operators attendance at Pre-Construction meetings for projects has become VERY poor. Power and gas seem to show up more than half of the time but telecom reps don't even respond to the invite. Without them, we can't effectively confirm or solve conflicts by redesign (street grades, pipe alignment, etc). For example, unknow and unreported concrete ducts with Windstream fiber were found laying storm sewer in 2017, 2018, and 2022 on reconstruction projects in the City. Resulted in taxpayer costs, contractor downtime, arguing and shifting of streets and storm pipes. I am not sure what the area and length is trying to achieve and would have to make an assumption. Does this refer to multiple excavations within these limitations?
476	We need to discuss this further. In metro areas a mile is still too much while in rural it could be appropriate. On C we should be able to reschedule for a mutually agreed upon time because the one call center schedules these and often has many scheduled for the same time.
477	The new language extending the dig date out to 5 working days is a huge ask for the excavator. Language should be considered to protect the excavator that states the operator is required to mark a minimum of 1000 LF or 20% of the total locate scope before the excavation start date and time. It also puts the majority of the burden for negotiating & documenting marking schedules on the excavator. With our ROW's filling up many of the locates of this type and scope will have 6 or more facility owners that are required to mark. The challenging logistics of getting half a dozen facility owners to agree to marking schedules that day in day out will consistently provide shovel ready work for the excavator are not improved by this new language.
480	Meets should include how many "crews" to be working in area and a person representing and/or running that crew be at meet. 1 person equals 1 crew.

Table 15. Comments on locate underground facility

Survey #	Comments on locate underground facility
308	This is a sneaky way of pushing the notice requirement out to 3-days and makes the current code unclear.
326	This seems reasonable.
331	We are large enough to manage this change. However, I do have concerns about smaller excavators and homeowners getting frustrated and not calling due to the added time. Those who watch the weather before deciding to excavate on a weekend project will find the added time to be a negative issue.
337	It's hard enough to get locates in the normal 48 hrs. Why should we give them more time? Do we get more time added on to our projects? These locating companies need to find more help. It's a struggle for all of us.
346	This is a fast-paced industry. 48 hours from the time of notification should be sufficient.

351	The only consistent in construction is change so adding an additional day is a lot.
352	just need to plan ahead.
363	While not a 72 hour advanced notice, the change has same net effect. Things change too rapidly even with the best planning to wait three days.
367	The operators can hire more third-party locators to locate their lines. The only reason these third-party companies are used so each can pass the buck back and forth making it nearly impossible for an excavator to get questions answered when something is wrong.
370	We have to wait 48hrs now, another 12-24hrs is too much!!!
371	if the longer notice is to allow for a more thorough locate; positive. If it is to buy more time for the locator, it feels like more tickets will stack up on the back end.
372	I think 48 hours should be 48 hours, this has been the standard for quite awhile. Changing this to 48 hours + isn't going to help anything, just push forward how soon people renew tickets. This change won't help anything in my opinion.
373	We're all busy I get that, but delaying a release time is delaying marking time in my opinion. What if a locator is in the area and could have marked something while there instead of making a return trip in future days.
396	This change will have great impacts for scheduling of locate technicians and will decrease past due tickets.
402	This might alter plans for excavation work for short notice projects.
411	This will just cause delays
419	Only a positive if the additional time improves the quality of the locate.
420	We have too short of a construction season the way it is and we need these locates as quickly as possible.
427	As stated above, I think the 48 hour period is working reasonably well. As the metrics improve with the changes proposed in .03 subd 5 perhaps we will learn that changes such as additional locators are necessary.
428	In many cases, I already do this. It would be good to let the contractors in general be aware of this timing too.
433	If a contractor submitted a ticket on a Monday Afternoon, we should have until Thursday morning before the dig ticket is good.
434	why can't they continue on with the current 72hrs on the day of notification? it sets us back 1 more day. more people need to be hired.
436	Locate Period - By allowing additional time will we receive more accurate locates?
445	That add too much time
453	This provision should help with the locators chasing a start time and be able to schedule their day more efficiently.
465	Are the additional hours given going to improve the accuracy of locate marking? Or an on-time response? Or is it going to just "kick the can down the street" and cause further delays for contractors because a utility owner/operator still cannot get a locator to site in a timely manner even with the additional time given? Why should contractors be the ones left to pay for delays that are the result of a non-response from utility operators or locators arriving late to perform locates.
472	<p>I would like to start with considering changing the definition of a boundary survey in 216D.01. Surveys for construction projects have a topographic survey performed which include utility location (markings/flags) and a laundry list of items. I order boundary surveys to identify the right of way lines or property lines which mostly focuses on property corner locations.</p> <p>Lengthening the time doesn't help scheduling from City/contractor side but if that is a "give" to get other changes then so be it. If not, I do not support. The locators need to adequately train, staff up and deliver the service. I also recognize they need time to do mapping research so as not to rush the locate marks and to be thorough and accurate.</p>

476	We should allow contractors to call ahead more than 14 days prior to the start of excavation so locators can better plan their work. If this proposal states 48 hrs. begins at 12:01 AM of the day after the notification was submitted, we are positive on this.
481	Survey tickets are at times for large areas. When it is busy in the middle of summer, survey tickets must be satisfied with maps.

Table 9. Comments on notification locate period and geospatial information

Survey #	Comments on locate period and geospatial information
5	" Subp 16. Utility quality level" is a really bad idea. We cannot afford laziness of employees to mark bad and give a low ratings. PLEASE PLEASE REMOVE IF APPROVED. Our current workforce needs to be controlled not given a back door out.
8	48 hours excluding day of notification is just going to load up the following day. Is GSOC changing how tickets are being processed? Meet tickets requiring excavating 48 hours after meet is going to cost excavators a lot of money!!
9	48 hours should be enough for marking the utilities out, some of the facilities are taking more than the time allowed and this is causing problems with our time to get our work done. Most locating companies are under staffed because of low pay.
11	Adding the time for a routine ticket will not make the locators any better then they are now.It will cost excavators more.
12	Allowing more time between tickets from 48 hours to (essentially) 72 hours is going to be challenging for small companies like mine. We already struggle administratively. Too, weather impacts schedules quickly in our climate. Slippery slope.....
13	Alot of the locaters don't either care or are lazy. Most of my services include grading entire lots, Planting trees throughout the yard ect. Almost every locate I call in I get a call from the locator. To extend time or not mark entire lot.
14	As a municipal utility operator regarding MS216D.04 changes, I want more time for our locators to respond to tickets, but also don't want longer ticket waiting durations for our own maintenance crews to do projects. Can I have the best of both world
16	contractors shouldn't have to wait 48 to 72 hrs for a meet and then an additional 48 hours for locates.
17	Delaying the dig start time from 48 hours to 72 hours is a huge negative to an already short construction season in Minnesota. Please don't extend the required start of dig time.
20	Does the ROW definition match with ROW as defined elsewhere in state statute and rules?
23	extending the locate period, when we have all this communication and technology only benefits the locating contractors. Its hard enough to schedule work out 2 full days now your adding an additional day. We have to staff our company accordingly
24	For 216D.04 - is ok as long as it is not expected to be survey grade or GPS'd accuracy.
25	For MS216.04 Subd 1 - Just have a set time amount, (48, 60 or 72Hrs) otherwise finish time can and will be ambiguous.
26	For MS216D.04 When speaking about geospatial location, you should refer to the ASCE 75-22 Standard. This standard is specific for recording and exchanging utility data.
34	I struggle with 48 hours not enough time so if we do locate's in morning. we have to wait another day
41	increasing lead times for the locates will result in markings wiped out between the time of marking and the allowed start time for the contractor which will be down time for the contractor who shows up onsite expecting to go to work and can't.
47	Increasing the time between the notification & excavation won't get more tickets marked. Each locator can only mark so many jobs in a week or month and 48+ will make for more relocate ticket!
49	MS216D.01 subd 9(1): Locate period should just be 48 hrs from submittal or 72 hrs from submittal. keep it simple.
50	MS216D.04 subd 3 g) Does the geo location info have to be electronic or can it be paper?
53	MS216D.04-g Geospatial information will be a huge burden to small operators. Great idea, just not practical. Aging work crew has no desire/ability to obtain this information.

61	Recommend MS216D.04Subd.3(g) to Dec. 31, 2025. Too many abandoned utilities in ROW req. positive confirmation of abandonment before work can be performed. Get them ID'd for worker safety
70	There should be requirement for all underground facility owners and/or operators to use GIS mapping of the existing underground facilities. This should be the information provided during a project design phase, and for precise locating.
74	we have a very hard time having job sites preserve our locates for 48 hours as it is. This change proposes that we must freeze job sites for 72 hours. This is untenable. This adds 50% to our timeline and will cause much chaos and problems.
80	overall I like these changes. the only change i have a little grief with is the 72hr & 48Hr time period for meet tickets. as long as an excavator can schedule these meets out a week or 2 from actual excavation.
82	All utilities should have to as built their facilities and provide usable maps.
88	we need to start making the owners use GPS when they install new utilities. Every other thing in the industry has to provide coordinates on where their stuff is, why not make the small utilities do it as well??
89	Unclear if tickets would be due at midnight following the 12:01 AM beginning of 48 hour countdown. Would like clarification on that.
92	What is the definition of "geospatial location information"? Does this mean that GPS data will be required or are hand drawn maps adequate? This could be a substantial financial burden if GPS is the requirement and GPS data should not be used as a standalone locating method anyway.
95	MS216D.04 Excavation; Land Survey, part (g) is vague, as the definition and precision of geospatial information is imprecise in itself.
98	The construction season in Minnesota is a small window, if you are going to give the locator extra time to mark utilities then Saturday needs to become a workday as well. 72 hours is too big of a window for the locators, you can have the meet scheduled, and they will cancel at the last minute then you have to reschedule for another 72 hours. There goes a week of time.
102	Only concern is that not all operators have access to locators or a means of marking new facilities with GIS data. Even though this is set to start in 2026, there may need to be some other data collection. I believe the industry is heading towards electronic mapping, but accurate mapping is more important than limiting operators to GIS data mapping. So allowing other means of accurately mapping new facilities should be explored as well.
105	For Subd. 3g, the operator should be required to provide digital locations of all facilities in public rights of way. Too many facility operators send a google maps location map with a highlighter location. There should also be a strict requirement for facility operators to provide a contact name, phone and email contact for an area representative to respond to location questions for excavation and non-excavation tickets.
106	Have concerns extending the time for locates to be completed. Also have concerns on not using white paint markings.
110	I realize you want to promote safe digging and give the locators more time to locate facilities but seems like you are catering to the locators and not thinking about the contractors who are trying to make a living everyday. In Minnesota it is a short dig season and extending locate times could raise havoc for everyday workers who are trying to make a living.
117	we are against modifications that allow more time to locate.

Table 10. Comments on digital white marking

Survey #	Comments on Digital White Marking
317	I think the ability to put marking or "electronic markings" need to be defined better. I also believe that if these are not accurate that the utility/locator should have the ability to request an extension on the ticket until that is done properly.
321	I do not believe Google Earth will provide sufficient data to establish a route.
323	its your rule and stick with it 1 standard marking
331	The ability to use electronic marking should leave no excuse not to use white markings.
337	I think a map and a meet is very effective

349	Unclear on how a white marking against a standard white background is feasible, without some form of prescriptive application; this conversation is similar to that concerning white paint on a snow covered landscape.
351	If white marking mean a red lined plan or drawing than this is a positive. Large scale highway heavy projects are really hard to mark in white paint or flags.
352	not sure what electrotonic white markings are? if this is the shapes we create on the online ticket request portal, then i like this.
367	White marking only help all parties involved.
370	Electronic white markings???? not sure what that means....seems like an open-ended statement.
371	What is an electronic white marking?
372	If white markings are REQUIRED, then it would be nice to be able to do them electronically. We have some grading projects where we're literally grading a mile at a time, it would be a waste of time and resources to go and put white flags the entire two miles "because the law said". If we just marked on the electronic map we're regrading everything, and the locators can call us for specifics, that works the best.
373	It is sometime difficult to mark an area that was estimated months prior that is a fair distance from our location when a customer decides to move forward with a project. Love the idea of electronic markings for this reason
396	Use of Electronic white marking has been proven as a very successful way to indicate dig areas which actually saves time for locators as they may be able to avoid a drive to site to clear the ticket.
398	Snow cover
410	More clarification should be made on what electronic white markings are
414	What would the format of "electronic white markings" be? Polygons drawn into the GSOC online requests? kmz, kml, or other gis format? Lines in a pdf?
427	I would like to check with the locators before approving electronic markings. I would suggest that pink or some other color could be allowed during winter months for visibility.
428	How are the electronic white markings provided by the excavator? Do we do this when we map out the area during the locate request? We locate lots for new homes. Am I supposed to physically mark with white paint each lot we work in?
433	Every and all contractors should mark out there excavation. Very tired of seeing, "DID NOT KNOW"
438	white markings works for simple linear projects such as a pipeline installation but does not work for 2-dimensional sites like roadways and site developments.
448	not sure what electronic marking are or how to use them
453	With enforcement - this will be a positive change.
455	PHYSICAL MARKING ARE NOT MISLEADING.
468	Electronic markings would be great. Having to run to a site to physically mark everything is full time employment for one person. With the current overload of work and timeline to get everything done is near impossible anymore. With detail maps and everyone's ability to have technology in hand this should be a plausible option.
472	I like your intent. But what is electronic white marking? Electronic white markings on white paper doesn't print. I think simple rewrite to indicate proposed markings on electronic format accomplishes what your goal is.
476	This requires more conversation. If we do this as it is written, we will get more digital white lining then physical, and the physical white lining is more precise. Each excavator will be sending in their own version of their digital white line. There is no quality control and we do not have the resources for enforcement when it is not done. We also need to discuss what takes precedence the written description or the white line.
477	Positive assuming the tool provided by the one call center has up to date surface maps or images to use for the marking effort.
480	Any ticket without white markings is voided and excavators must cancel ticket and call in new ticket when white marks are present in ether format.

Table 11. Comments on overall changes

Survey #	Comments on overall changes
9	Keep everything as is.
12	Contractors shouldn't have to wait 48 to 72 hrs for a meet and then an additional 48 hours for locates.
16	The operators profit off their systems, the locating companies take on too much work, the excavators continue to suffer the consequences. These laws strengthen that position. Locating companies will just take more on and the safety issues will remain.
17	Thank you.
19	From how I read most of these changes it's making it harder for the excavator. It would be a lot easier to read if it wasn't in legal terms. Or provide the info of how it was to how it's going to be side by side. It's hard to read and understand.
22	For MS216.04 Subd 1 - Just have a set time amount, (48, 60 or 72Hrs) otherwise finish time can and will be ambiguous.
25	White doesn't work in the Winter. Everyone switches to Pink. No way around it.
26	increasing lead times for the locates will result in markings wiped out between the time of marking and the allowed start time for the contractor which will be down time for the contractor who shows up onsite expecting to go to work and can't.
27	MS216D.04-g Geospatial information will be a huge burden to small operators. Great idea, just not practical. Aging work crew has no desire/ability to obtain this information. MS216D.03-Just more busy work. It is covered during annual audits.
29	48 hours excluding day of notification is just going to load up the following day. Is GSOC changing how tickets are being processed? Meet tickets requiring excavating 48 hours after meet is going to cost excavators a lot of money!!
30	I white mark everything already. But this could give locators an excuse to not locate if someone pulls the flags. It is hard enough to get them out and locate the jobs as is
34	Often times you do not know exactly where on the property you are going to have to excavate. If you know the entire front yard could be involved ie sewer/water breaks. It is really nice to know where all the utilities not just where you are digging.
35	" Subp 16. Utility quality level" is a really bad idea. We cannot afford laziness of employees to mark bad and give a low ratings. PLEASE PLEASE REMOVE IF APPROVED. Our current workforce needs to be controlled not given a back door out.
39	The 1 mile length meet requirement for excavations is a bit excessive when you're talking locates in the countryside. in town it makes sense, but in the country it should be a larger area.
40	Allowing more time between tickets from 48 hours to (essentially) 72 hours is going to be challenging for small companies like mine. We already struggle administratively. Too, weather impacts schedules quickly in our climate. Slippery slope.....
41	Need more information on electronic white markings. Physically marking an area with white paint is not always feasible
42	Making us chase an hour to job site to place white markings is expensive and time consuming. You are driving to cost to do business up. Especially when a backyard patio or a retaining wall is being installed on a residential site.
59	White markings in the field Cannot be misinterpreted. I'm not confident in everyone's electronic capabilities.
60	I would feel positive except for allowing markings to be electronic. Physical markings still should be required as they provide more specific areas of excavation instead of an address. This will result in more staff time needed for locating.
70	MS216D.04 1b a - The size requirement is fine, but the provision not allowing the breaking up of smaller work impractical. MS216D.05 2 - In what format will the electronic white marks be provided back to the locators in the field?
71	Having physical white markings showing the proposed route is invaluable. It allows locators to mark precise crossing locations. Electronic markings reduce safety. OPS should get on-time marking reports from GSOC, not add requirements for operators.
73	One issue we are running into is snow removal being without a survey ticket submitted by the excavator..When the snow is to high the excavator may not see the cabinet or cabinet marker. The use of orange ribbon around poles. The snow covers up the wh

77	If plans could be uploaded to the online system to identify exact excavation areas, it would be amazing and be such a time saver for everyone.
78	The most useful thing MN could do is make a required reporting form where utilities MUST report dig in's after marking and including a warning and fine progression for excavators. Businesses need to be held accountable and a database created.
82	It's a start in the right direction.
83	MS216D.03 new subd 5. Couldn't the notification center provide these reports rather than the operators? MS216D.04 subd 1b a), I assume it means 1 mile or more? MS216D.04 subd 3 g) Does the geo location info have to be electronic or can it be paper?
85	If it is encouraged to call in a meet locate ticket, essentially changing the timeframe from about 72 hours to a full week from notification request to when excavators can legally dig is a major deterrent.
86	The "locate" definition does not seem to allow recognition of sites that were "clear" after visit or excavator contact. That's still a locate.
90	if we give locators the extra day when they are already using the 1 day extension do they now get 4 days? I do routes on e tickets and get called back because locaters cant see that info will you force locators to update there software in the field?
97	Digital white line - it's about time. North Dakota has been using for years. No on Mandatory Meet Tickets
98	MNOPS should be able to get the type of tickets and timely response directly from GSOC. Electronic marking can be difficult to interpret. Imagery may not be updated. Physical white markings make it clear to the locator where the work will be done.
99	"Mark entire lot" or "radius" used to work just fine.
100	MS216D.01 subd 9(1): Locate period should just be 48 hrs from submittal or 72 hrs from submittal. keep it simple. MS216D.03 Subd 5(c): Data should be used to start enforcement actions for operators not marking. Not enough space allowed for comments!
103	I generally feel positive about the proposed changes. With that said, any law change must allow the utility/locator and the excavator to have a mutually agreed upon work schedule or a rescheduled locate date on any normal ticket. This is critical.
104	This will without a doubt delay proposed work. Facility operators and designers already get too much protection or lack of enforcement..
106	MS216D.03 quarterly is frequent compared to other states. Some are every six months and others annually. Gathering the data is important but would prefer a longer timeframe. Damages should also require notification to 811 plus owner.
107	Dig sites for sewer repairs are often unknown therefore marking ahead with with paint is not always possible
108	The issue I have is with the Proposed Meet requirement. When you take a total an add'l 72 hrs for the locate ticket to be marked you are taking time off of the due date of a project which can lead to fines for some companies. Please rethink this rule
114	I feel that electronic white markings can be dangerous. The more info that can be provided to the locator the better. Its always better to physically see where the excavation. Also Needs definition of electronic white markings and white markings.
115	Recommend MS216D.04Subd.3(g) to Dec. 31, 2025. Too many abandoned utilities in ROW req. positive confirmation of abandonment before work can be performed. Get them ID'd for worker safety MS216D.05 section 2 is either/or, not white markings for all.
122	Physical white marking is the best way
124	The reporting burden is not worth the additional labor requirement on the facility owner. It also provides an opportunity for a bureaucracy to expand and become an overwhelming police state. White markings don't work in the snow.
125	I feel that with meet tickets now requiring 5 days that the amount of meets that will take place on Mondays. And like wise the we are providing more time, 72 hours for a simple meeting, but 48 hrs, to do the physical locating work. Counterproducti
127	Does the ROW definition match with ROW as defined elsewhere in state statute and rules?

129	As a municipal utility operator regarding MS216D.04 changes, I want more time for our locators to respond to tickets, but also don't want longer ticket waiting durations for our own maintenance crews to do projects. Can I have the best of both world
134	we have a very hard time having job sites preserve our locates for 48 hours as it is. This change proposes that we must freeze job sites for 72 hours. This is untenable. This adds 50% to our timeline and will cause much chaos and problems.
145	I struggle with 48 hours not enough time so if we do locate's in morning. we have to wait another day
151	For small landscapers, the "white markings" are excessive. We do small repairs, and rarely go onsite before repair.
152	Too easy to have communication errors with white marking for excavations especially when talking entire ROW. Excavators should have access to maps of utilities. New construction utilities maps should be updated quicker. Prevailing wage for locators.
153	MN one call site needs digital white marking capability. Increasing the time between the notification & excavation won't get more tickets marked. Each locator can only mark so many jobs in a week or month and 48+ will make for more relocate ticket!
161	There should be requirement for all underground facility owners and/or operators to use GIS mapping of the existing underground facilities. This should be the information provided during a project design phase, and for precise locating.
162	Delaying the dig start time from 48 hours to 72 hours is a huge negative to an already short construction season in Minnesota. Please don't extend the required start of dig time.
164	48 hours should be enough for marking the utilities out, some of the facilities are taking more than the time allowed and this is causing problems with our time to get our work done. Most locating companies are under staffed because of low pay.
165	extending the locate period, when we have all this communication and technology only benefits the locating contractors. Its hard enough to schedule work out 2 full days now your adding an additional day. We have to staff our company accordingly
166	Electronic white markings has a tremendous value to all parties. This will save windshield time reducing emissions, travel risk, and overall savings to all companies on both sides.
170	Alot of the locaters don't either care or are lazy. Most of my services include grading entire lots, Planting trees throughout the yard ect. Almost every locate I call in I get a call from the locator. To extend time or not mark entire lot.
175	Adding the time for a routine ticket will not make the locators any better then they are now.It will cost excavators more. We are not able to white mark running lines until we know where the existing utility's are? This would not benefit us in any wa
181	(Specific) Location of the meeting place must be included on any Meet Ticket.
182	This section is very limited. A few sentences, and it is full. I tried, but cannot provide more detailed comments to each of the proposed changes. No ability to comment on each change individually. Not good.
183	For MS216D.04 When speaking about geospatial location, you should refer to the ASCE 75-22 Standard. This standard is specific for recording and exchanging utility data.
188	White marking in the field need to be the only way. Many times, office people call in the tickets and mess up. Having the white marks in the field it's a chance catch the mistake. I know I have many times for contractors.
190	If electronic white marking is adopted, the stakeholders need to establish some best practice guidelines as to how it needs to be done. (we heard complaints about simply uploading construction plans, without any indication of the perimeter of excavation, for example)
191	Meets should be required for any HDD over 500 feet.
193	For 216D.04 - is ok as long as it is not expected to be survey grade or GPS'd accuracy. For the quarterly reporting, the 5000 tickets exemption is too low.
194	My experience has been that meets are not very productive, so requiring locators and contractors to have them on large projects will not significantly improve safety. Most contractors will call for them if they are necessary. Rather than all together excluding the day of notification, can the scope of the locate be considered? Perhaps submitting a locate request under 1000 feet would include the day of notification, and anything over 1000 feet would not.
195	I do not think only electronic markings is a positive as this then requires additional equipment by the utilities when marking to ensure correct location. White physical flags are a positive means of identification.

199	not a fan of the electronic markings, electronics are not reliable, paint and flags are
202	Interested to hear possible methods to submit quarterly reports to OPS. My hope would be this could be done through existing GSOC ticket management systems, like KorWeb. Marking laterals for a system as old as MCES Interceptor system will prove challenging. Interested to learn more about 'utility quality level' ratings.
204	Electronic white marking is a great idea AS LONG AS EVERYONE INVOLVED CAN SEE THE MARKS. This includes call center, the operator, the locators in the field, the excavator, etc. I know in years past various states' online ticketing have had the capability to upload a picture/ file drawing but it turned out only the person completing/ approving the ticket at the call center could see it. The locators out in the field could not, rendering this capability practically useless.
205	Changes to the 48 hour rule and the meet ticket size will be great changes to 216D. However, the electronic option to white line is not. Every ticket will turn into an electronic white line and locators will have no real starting point as excavators will just extend buffers greatly to cover their work area.
212	You need to have an equal balance of construction companies and Utility companies.. This is only favoring the utility companies. Unfair representation
214	Nothing in here helps the current situation, it only benefits the utility owner.
220	Sometimes we need to know the location of utilities before we come up with a plan. Requiring white marks doesn't work in that situation. Ive also found most locators don't respond to boundary surveys.
223	Have concerns extending the time for locates to be completed. Also have concerns on not using white paint markings.
231	For Subd. 3g, the operator should be required to provide digital locations of all facilities in public rights of way. Too many facility operators send a google maps location map with a highlighter location. There should also be a strict requirement for facility operators to provide a contact name, phone and email contact for an area representative to respond to location questions for excavation and non-excavation tickets.
232	Locators need white markings of some kind. Electronic markings just make the excavators life easier. Physical white markings take any guess work out excavation location.
233	What is meant by "electronic white markings"?
234	Only concern is that not all operators have access to locators or a means of marking new facilities with GIS data. Even though this is set to start in 2026, there may need to be some other data collection. I believe the industry is heading towards electronic mapping, but accurate mapping is more important than limiting operators to GIS data mapping. So allowing other means of accurately mapping new facilities should be explored as well.
242	Hoping to see realistic/ well rounded representation, in an average excavator & utility locator working relationship, with any changes that are made.
244	I do not believe they should be able to do electronic markings. They need to be familiar with their site. The site is different than the maps.
258	My only comment is on the last one regarding white markings. White doesn't work in northern Minnesota in the winter. Pink should be allowed as an alternative in the winter. However, I do like the option for electronic markings.
268	The construction season in Minnesota is a small window, if you are going to give the locator extra time to mark utilities then Saturday needs to become a workday as well. 72 hours is too big of a window for the locators, you can have the meet scheduled, and they will cancel at the last minute then you have to reschedule for another 72 hours. There goes a week of time.
269	The electronic white marking are a great idea for the non-emerge tickets but what about for emergencies and in states where it has just snowed or snows after markings are set for the physical markings in the field,
270	Meet tickets are currently used in some cases to sidestep waiting periods, recklessly destroy markings and have an on-demand locator. Writing anything in the law that requires operators to agree to meeting terms is only going to make that worse, and embolden the abusers, especially given how long these tickets are valid. Locators are already having thier routes disrupted on a whim for thousands of these tickets everyday. This will also encourage overnotification because excavators will request a mile even if they don't really need it, just to get the meet type ticket, when otherwise it would be unnecessary. Also, this language requires a meet for every project of this scope, when in many cases simple language can describe the area without it being complex or requiring a meet. These changes will add additional inefficiencies, and delay locating resources unnecessarily.
273	MS216D.04 Excavation; Land Survey, part (g) is vague, as the definition and precision of geospatial information in imprecise in itself.
275	From an excavator perspective we beleive the greatest risk to our people, the public and stakeholders is timely locating (responsive), locating with accuracy (including abandoned utilities as this creates a very dangerous situation if abandoned and active gas or electric lines are parralelling) and operators/owners to participate in meets and provide benficial information. These proposed changes offer marginal improvement in the aforementioned categories.
276	As a Telco operator, most of the proposed changes appear to hit this industry more than any other. When doing upgrades to our infrastructure, we call in many miles of route. To change this to a meet requirement will tie up

	<p>manpower, and create a large amount of additional paperwork for these types of projects, all the while muddying up where responsibilities lie.</p> <p>In my opinion, meet tickets are already used incorrectly more often than they are used correctly. Adding more meets to the construction season will not help this. I believe that a large part of the push for meet tickets is based on excavators calling in more work than is realistic in a day or week.</p> <p>I am both responsible for having our facilities located for work by other entities, and for calling in locate tickets for our own crews to proceed with work. My company has used contract locating services, as well as doing our own locating. So I am sharing a point of view from having seen both sides of most situations.</p>
277	<p>The information regarding the number and type of notifications and notifications marked by start time should be able to be gathered directly from GSOC through automated reports rather than from the utilities.</p> <p>More information is needed regarding how "electronic" white markings will work before I will be comfortable with that concept.</p> <p>What is the definition of "geospatial location information"? Does this mean that GPS data will be required or are hand drawn maps adequate? This could be a substantial financial burden if GPS is the requirement and GPS data should not be used as a standalone locating method anyway.</p>
283	<p>My biggest concern is what are electronic white markings and how is that accomplished. It is often not practical to physically mark the area so if there is no exception the method needs to be easy enough not to create a burden. I'm not clear why the current one call mapping does not accomplish this.</p>
285	<p>Unclear if tickets would be due at midnight following the 12:01 AM beginning of 48 hour countdown. Would like clarification on that.</p>
292	<p>we need to start making the owners use GPS when they install new utilities. Every other thing in the industry has to provide coordinates on where their stuff is, why not make the small utilities do it as well??</p>
298	<p>There are issues from the Excavator's side need to be addressed also. Operators need to be more responsible for delays that are caused by them, or their third-party locators not showing up on time for locates. We have had numerous issues where crews are waiting for locators for hours past the locate due time and at times even days have gone by. Who should be responsible for the costs incurred? If you end up extending the period of time operators have to locate then we better not have any delays. And if there are delays the law should state the company who caused the delays are responsible for the costs of that delay. To be billed to that party from the excavator.</p>
306	<p>Leave it alone - We don't have time to go paint out areas to be located!!!</p>
307	<p>i see nothing noted above about instituting prevailing wage requirements for utility locators. if a guy can flip burgers and make the same amount of money instead of taking the liability and labor intensive work of locating, why wouldnt they? i understand the state has no horse in this, it is a result of cheap utility owners shopping out locating contracts to backwoods firms like stake center. however, if the state can subsidize worthless liberal arts degrees, you'd think they could pony up a few bucks to raise the wages of the men and women that have lives in their hands. change notification periods all you want, all you are going to do is impede progress. the only solution to the sub-par locating conditions that have been occurring in the past 4+ years (ever since century link brought the entire industry to a grinding halt in the spring of 2019 due to cost saving efforts) is higher pay for the men and women actually doing the work.</p>
310	<p>Not a fan of increased reporting burden for utilities</p>
312	<p>Quit changing what works and has worked just fine for many years!! If you change too many things people will just stop using it and then what are you gonna have!! Quit trying to make this harder on the small guys!!! This is stupid!!!</p>
313	<p>All utilities should have to as built their facilities and provide usable maps.</p>
331	<p>We still need to address the need to allow the use of mechanical hydrovac equipment to pothole. The state law requires hand digging only. This is so archaic and so contrary to best practices. It is time to get this clarified. Seems pretty simple to do so.</p>
352	<p>overall I like these changes. the only change i have a little grief with is the 72hr & 48Hr time period for meet tickets. as long as an excavator can schedule these meets out a week or 2 from actual excavation.</p>
370	<p>I realize you want to promote safe digging and give the locators more time to locate facilities but seems like you are catering to the locators and not thinking about the contractors who are trying to make a living everyday. In Minnesota it is a short dig season and extending locate times could raise havoc for everyday workers who are trying to make a living.</p>
372	<p>Definitely a mixed bag.</p>
396	<p>Overall, the changes are good. The Performance Reporting definitely needs more work before we would support the change.</p>

398	When do the utilities locator be held accountable for miss marking our not making at all. (Usic)
402	Hopefully these changes can help make someone's job easier and productive.
418	It seems to benefit the locators and not the contractors. If they can't locate on time they need to hire more locators. Not have locators that are responsible for to large of an area. We have to get our work done on time. Why can't they?
420	The quality and care for the locating services has gone backwards in the last 10 years. Locators are not given either enough information or are not trained properly. Locators get confussed with the new and old cables that are in the ground. Installation of utiliites needs to be more closely watched also.
427	One contractor I connected with mentioned the problem of above ground facilities (e.g. telephone peds, power tubs, odorizers) being buried by snow. When the contractor brings out a dozer to push snow away from the roads these facilities are at risk. While some facility owners are diligent in adding tall markers to protect these, others do not. I would ask that this issue be explored and a solution found.
428	I have concerns about the white markings. Other than that, I can work with the changes proposed.
433	Update excavations need to be fixed. Locating an area 4 to 5 times before a contractor starts work is unnecessary. Plus a contractor should preserve marks so remarks are not necessary.
445	we are against modifications that allow more time to locate. We give extra time when we can, but are frequently called and asked to extend the tickets
448	not sure what electronic marking are or how to use them
451	Overall negative, must have these two issues resolved to ensure public safety and appropriate use of resources: 1. MS216D.01 Definitions -Locate" - must strike or align with the definition already in Minnesota Rules Chapter 7560.0100 Subpart 4. If you must keep it strike the word "tee". Otherwise, it should go to rulemaking to change the current Minnesota Rule. 2. MS216D.04 Excavation; Mapping - utility operators should be able to maintain information by any means as long as we are able to meet other MS216D requirements. Accurate locates require field review. Also, need to restore the following language to MS216D.01 sub 3: "unless otherwise agreed to between the excavator and operator". We suggest that rulemaking is appropriate for several of these proposed changes. The public needs to be represented as they ultimately bear the cost of regulatory changes to MS216D, and their safety is one of the primary purposes of the statute.
455	HAVE HAD BAD EXPERENCECE WITH EMERGENGY LOCATES IN THE PAST YEAR NOT RESPONDING, MOSTLY GAS LOCATES.
468	Some I agree with others I don't.
472	I am please to hear changes. Since COVID, field locates have drastically suffered in accuracy, timing and overall performance. This has had an impact on my design and contractors say they are raising their bids for certain telecom areas. I have redesigned a marked conflict in the field and get a call the next day that there is another unmarked cable in the way or that we have to go back to the original plan. In 2021, a locator ran out of orange Windstream flags so he put down Charter flags. We coordinated a 500 foot long cable relocation with the wrong company. Charter showed up 1 week before strom pipe and informed me that it wasn't their cable to relocate. We ended up with delays, realignment and costs to the taxpayers. Abandoned cable/conduit/pipe is becoming a safety issue as the mapping and locating is very poor. In some cases, nobody accepts ownership of them. I have some great working relationships with some operators and others have difficulty communicating with.