

# Article 1

## NOW is the Time to Address 'Late Locates'

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### 1. 'Late Locates' Background

Ontario took a large step forward in 2012 by establishing a mandatory One Call system to allow homeowners, construction contractors and other excavators to make one locate request to a call centre instead of the previous practice of requiring separate calls to up to 14 separate utilities.

A locate, however, is of little value unless it is both timely and reliable. In recent years, there have been growing concerns by all stakeholders on both sides of the Canada US border, about the perceived increase in the number and duration of late locate responses. Other stakeholders believed that 'late locates were temporary'<sup>1</sup> and that "It may take a couple of months to work out the kinks, but a five day locate standard will happen in Ontario."

Six years later, the same Landscape Ontario professional who had expressed optimism about five day locate responses was at the ORCGA's 2020 Symposium and noted: "almost every contractor that came into the ORCGA exhibit complained about late locates. I was surprised. Their comments were very upsetting because nothing seems to have changed over the last decade. Many contractors indicated that in some cases, locates were up to 15-20 days late. Late locates cost contractors time and money."

<sup>1</sup> <https://horttrades.com/the-solution-to-utility-locate-problems>

## 2. Evolution of DIRT Reports

The DIRT Report (Damage Information Reporting Tool) which is familiar to Ontario stakeholders originated through the US Common Ground Alliance (CGA). The foundation for DIRT reports (whether in the US or Canada) was and continues to be an examination of data for “events that could have, or did, lead to a damaged underground facility”, including damage information, downtime, and near misses. Canada’s current CCGA Best Practices<sup>2</sup> defines the term “Event” as “the occurrence of an underground infrastructure damage, near miss or downtime”.

In May 2020, the CGA provided a supplement to its DIRT report regarding ‘near-miss data’ for the years 2015-2018<sup>3</sup>. The headline of the associated press release read “Common Ground Alliance Analysis of Near Miss Data Suggests Late Locates of Buried Utilities are underreported”. That same article also included the following statement: “Isolating and examining near miss data helps us see what makes those situations unique for certain stakeholders, and has also illuminated paths for new data correlation and analysis, such as the potential for leveraging data from one call centers’ automated positive response (APR) systems to gauge the percentage of locate requests that are addressed late.”

## 3. The Relevance of ‘Late Locates’

As of late 2020, neither the US CGA, nor any of the Canadian Regional CGA chapters have had questions about the timeliness of locate responses as part of their DIRT data fields.”

Late Locates are a potential cause of “downtime”, and “downtime” is a reportable event that is related to ORCGA’s primary mission of damage prevention. The ORCGA does not yet have sufficient data to determine whether there is a direct link between late locates and infrastructure damage, and whether measures to reduce the number of late locates will trigger a corresponding reduction in infrastructure damage.

It is difficult to solve a problem if you cannot measure it. Doctors cannot be certain that a dose of a drug will reduce a patient’s high fever unless the doctor can measure the patient’s temperature. Similarly, one cannot know if specific steps will decrease the frequency and/or severity of late locates, unless there is a measurement of the frequency and severity of late locates before and after the steps are implemented. Due to the anonymity that is at the heart of the DIRT tool and the familiarity that stakeholders already have with inputting data into the DIRT tool, the ORCGA has determined that a measurement of ‘late locates’ should become a part of the DIRT tool.

## 4. Steps that Might Reduce Late Locates

In October 2020, CGA released its ‘Locator White Paper’<sup>4</sup>. One of the observations from that White Paper is: “If you’re going to squeeze productivity too much that means you’re going to push your locators harder, and they’re going to cut a corner. Something is going to be mis-marked or not marked and that’s where damages occur.”

The number of Ontario excavation activities that trigger locate requests is expected to grow year by year, although there may be temporary reductions

<sup>2</sup> CCGA Best Practices Version 3.0 – October 2018 at [https://orcca.com/wp-content/uploads/2018/11/CCGABest-practices\\_version3\\_October2018.pdf](https://orcca.com/wp-content/uploads/2018/11/CCGABest-practices_version3_October2018.pdf)

<sup>3</sup> US CGA Supplemental Report at <https://commongroundalliance.com/DIRT>

<sup>4</sup> <https://commongroundalliance.com/Portals/0/CGA%20Locator%20White%20Paper%20-%20FINAL%2010.21.20.pdf?ver=2020-11-10-130356-690>

in construction activity, either due to a major and lasting economic downturn, such as the 2008-2010 recession or the current COVID-19 pandemic.

In order to avoid pushing locators harder, the number of locate requests handled by locators can be reduced, and some of the difficulties for a specific locate response can be simplified.

Increasing the number of qualified locators available to respond to locate requests is likely to have a significant positive impact on reducing the number of locate requests handled by individual locators, however qualified and experienced locators cannot be created instantly, this is a step that will likely take several years to complete. Before proceeding in this direction, we will need answers to the questions of “who is going to pay for the training of the new locators?” and “who is going to cover the incremental cost of adding locators to various payrolls?”

The number of locate requests can also be reduced by extending the validity period of locate tickets from the prior practice of 30-day validity periods to 60-day tickets or longer. Recently many Ontario infrastructure owners have either implemented or agreed to implement this step. Other measures that could reduce the number of locate requests without reducing construction activity also includes placing greater onus on project owners to obtain locates on behalf of all prospective contractors bidding on a construction project instead of leaving it to individual bidders to obtain request their own locates. Authorizing the sharing of locate tickets among multiple excavators at a single project is another way to reduce the quantity of locate requests.

The US CGA published a White Paper in October

2020 ‘Insights into Improving the Delivery of Accurate, On-Time Locates’<sup>5</sup>, which was based largely on detailed interviews with high level decision makers at 20 locating and utility companies as well as questionnaires completed by more than 400 locate technicians from across the US. The white paper lists several actions to improve locate quality and turnaround times, including, but not limited to:

- Making white lining by excavators mandatory;
- Putting a greater emphasis on infrastructure owners to maintain and share updated maps; and
- Investing in improved locate technology and more accurate equipment.

## 5. Conclusions

Late Locates are neither a recent nor temporary phenomena and there is no simple, one-time fix that will alleviate the number and severity of late locate responses.

Each group of stakeholders has a unique opportunity to take positive steps that will reduce the frequency and severity of late locates. Measures taken by stakeholders to reduce late locates might also help to decrease the number and severity of damages to buried infrastructure.

One of the first steps to addressing the problem of Late Locates is to obtain measurements of the source and severity of the problem. ORCGA’s decision, to add a field to the DIRT questionnaire regarding the timeliness of locate responses, is likely to be a vital and constructive measurement tool for the ORCGA and its stakeholders. 

<sup>5</sup> <https://commongroundalliance.com/Portals/0/CGA%20Locator%20White%20Paper%20-%20FINAL%2010.21.20.pdf?ver=2020-11-10-130356-690>