



## Pipeline Operator Public Education Programs: Report on the Results of Operator Self-Assessments Required In Response to the Pipeline Safety Improvement Act of 2002

### **Background**

In November 2001, the U.S. Department of Transportation, Research and Special Programs Administration's Office of Pipeline Safety (OPS) began working with and advising a pipeline industry task force that was preparing guidance (API Recommended Practice (RP) 1162) for pipeline operators in the development, implementation and evaluation of effective public education/awareness programs. OPS has drafted a notice of proposed rulemaking (NPRM) and plans to incorporate the guidance of RP1162 by reference into regulation. OPS also plans to sponsor and support workshops to help pipeline operators develop and implement effective public education programs.

On December 17, 2002, Congress issued the Pipeline Safety Improvement Act of 2002. Section 5 of the Act called for operators of gas or hazardous liquid pipeline facilities to review their existing public education programs for effectiveness and modify the programs as necessary, by December 17, 2003, and submit the completed programs to OPS.

OPS determined that the most effective way to meet the intent of those requirements was to ask operators to complete self-assessments of their programs. The self-assessments would allow operators to acknowledge the requirements of the Act and existing pipeline safety regulations and to baseline their programs against the guidelines in RP 1162. With input from the pipeline industry and a contracted professional organization, OPS drafted a Self-assessment form and developed a web-based method for operators to complete the forms online. Two workshops were held by the RP1162 task force in September 2003 to introduce RP1162 to hazardous liquid and gas pipeline operators and to test the draft Self-assessment form.

OPS issued an Advisory Bulletin in a Federal Register Notice on November 25, 2003, reminding pipeline operators that they must complete and submit self-assessments of their public education programs to RSPA/OPS for receipt no later than December 17, 2003, to meet the deadline established in the PSIA.

The results of those operator self-assessments are included below.

### **Scope of the Pipeline Operator Public Education Program Self-assessment**

A pipeline operator may have a single public education "program" for all of its pipeline assets. This is particularly likely for smaller companies and local gas distribution company operators (LDCs). An operator's program may address all elements of the operator's efforts related to public awareness and education regarding its pipelines, including who, what, where, how and when.

Within the purview of its program, an operator may develop and implement multiple public education "plans" based on the configuration and mix of its pipeline systems and assets. These separate plans may be specific, for example, to different periods of time, to a mix of audiences, to one or more pipeline systems, segments, or facilities, or to different geographic areas.

Conversely, an operator may have multiple pipeline public education "programs", each administered separately and possibly with different requirements and internal guidelines. This could be the result, for example, of the company being a composite of different individual pipeline business units. Each of these

multiple programs might contain different and unique requirements for the development and implementation of public education program "plans" related to the company's different pipeline systems.

The OPS Pipeline Operator Public Education Program Self-assessment was intended to address a single pipeline public awareness "program". If the operator has multiple pipeline public education programs in use, a separate self-assessment was to be completed for each program.

### **Key Statistics from Operator Self-Assessments of Public Education Programs**

- The cut-off date for operators to submit their self-assessments was December 17, 2003. Overall, responses were received for 1,449 operator systems, based on their identification by OPS Operator Identification (Op ID) Number.
- Many operators include multiple systems under single educational programs.
- Self-assessments were received for the vast majority of gas transmission and liquid pipeline operators, based on the OPS 2004 User Fee Lists. These covered the majority of the respective pipeline mileage (see mileage statistics below). Responses were received for:
  - 85% of the Liquid pipeline operators
  - 80% of the Gas Transmission pipeline operators.
  - 68% of the Gas Distribution pipeline operators
- Overall, of the operators responding, data indicates that:
  - 91% conduct a single public education program to cover all of their systems. (Question 2a)
  - 95% were aware of the current requirements found in 49 CFR Parts 192 and 195 for operators to conduct public education programs. (Question 3.1)
  - 92% currently conduct public education programs as required by the regulations. (Question 3.2a)
  - 90% were aware of the public education program requirements found in the Pipeline Safety Improvement Act of 2002 (PSIA-02). (Question 3.3)
  - 92% were aware of the PSIA-02 requirement to review and modify their programs by 12/17/03. (Question 3.5)
  - 77% had conducted initial reviews to determine the effectiveness of their public education programs in response to the PSIA-02. (Question 3.6a)
  - 69% had determined that modifications to their current programs were necessary. (Question 3.6b)
  - 59% had begun making modifications to their current programs. (Question 3.6c)
  - Of the 261 operators that responded to the question asking how long is expected before a program will be fully developed and implemented if the operator does not currently have a public education program:
    - 60% indicated 1 year;
    - 22% indicated 2 years;
    - 6% indicated 3 years; and
    - 12% indicated more than 3 years.

### Additional Observations

- The responses are considered very positive in that a large percentage of operators, especially liquid and gas transmission, have recognized and identified the need for modifications to their programs. (Questions 3.6 b, c)
- A fairly large percentage of the operator programs promote the use of the one-call system prior to excavation. (Question 3.4a) A smaller percentage of operators promote the other messages related to

damage prevention and recognition and response to pipeline releases. This indicates aspects where operator programs are likely to need strengthening. (Questions 3.4 b - f)

- Approximately 50% of the self-assessments indicate that management support for the public education program is not "high". This shows good candor on the responses. Overall, most of the industry seems to have been responsive and candid in completing the self-assessments. (Question 4.3a)
- Less than 30% of the operator programs require periodic development and documentation of program plans. This is considered an important aspect of a program. (Question 5.5a)
- Less than 50% of the operators require documentation of the actual program efforts. This is considered an important aspect of a program, especially as it regards the ability of the operator to evaluate and measure the program's effectiveness. (Question 5.5e - h)
- A significantly small percentage of operator programs require a periodic assessment of the program's effectiveness. This is an important area; assessing a program's effectiveness is necessary to ensure the public and other stakeholders are receiving and understanding the messages related to pipeline safety. (Question 6.2a)
- A very small percentage of operators use audience surveys to measure program effectiveness. Such surveys are considered a most important method of program evaluation and it is considered very important to encourage and support more operators in the use of audience survey tools to measure effectiveness. ( Question 6.4c)
- Follow up is needed to find out what constraints and issues will affect the operators' ability to develop and implement public education programs (Question 7). While the data for Question 7 is somewhat surprising, OPS and its state partners recognize that the self-assessments were done prior to any relevant rulemaking regarding operator public education programs and the data is understandable in the absence of a regulatory driver.
- There are some indicators of where operator programs are weak but not why (e.g., lack of \$, lack of management, drivers, etc.). The "why" is crucial information that would be useful to determine.

#### Mileage Statistics

- Self-assessments were received for approximately 85% of the hazardous liquid pipeline operators listed in the OPS FY 2004 User Fee Data List. Those represent approximately 96% of the total hazardous liquid pipeline mileage.
- Self-assessments were received for approximately 80% of the Gas Transmission pipeline operators listed in the OPS FY 2004 User Fee Data List. Those represent approximately 96% of the total gas transmission pipeline mileage.
- OPS and its state partners will be following up with operators that did not complete and submit Part A (Questions 3.1 through 3.6) of the self-assessment.

## **Caveats**

- The self-assessments were completed and submitted independently by the operators in a relatively non-controlled process. That is, a standard self-assessment form was made available and operators completed and submitted their responses to OPS in a variety of methods (online, Email, fax, and regular Postal Service mail). As a result, the statistics reflect the overall population of responses. In some cases, minor discrepancies may be noted in the logical numbers of responses to certain ‘dependent’ questions. For example, the statistics for Question 3.2(a) show that 1,337 operators carry out continuing education programs as required by the regulations. However, 1,362 operators responded to Question 3.2(b) which was written as a dependent question to Question 3.2(a). Thus, 25 more operators responded to the dependent question than responded to the precedent question. In all such cases, the discrepant numbers are considered relatively insignificant and the results can be used to reflect a valid and representative picture of the current status of pipeline operator public education programs.
- The operator type was indicated by the operator on the self-assessment response or was filled in by OPS support staff using a variety of checking methods, including the operator name (e.g., “City of” indicates a gas distribution operation) and follow up telephone calls to the submitting operator. However, due to gaps in the information provided by the operators, there may be minor gaps in the statistical data related to the types of operators responding. The most obvious example would be gas distribution operators that also operate one or more gas transmission or liquid pipelines but that did not include that information in the self-assessment response. OPS carried out a robust effort to check and confirm much of this data and any gaps are not considered to significantly affect the results.

## **Additional Statistics Regarding Operator Public Education Programs**

The following sections provide the statistical information for each question in the self-assessment. The sections are presented in the following order:

- Overall responses (Page 5)
- Responses for Liquid Pipeline Operators (Page 14)
- Responses for Gas Transmission Pipeline Operators (Page 23)
- Responses for Gas Distribution Operators (Page 32)
- Responses for Gas Gathering Operators (Page 41)

**Statistics for Overall Responses**

**2(a): How many separate pipeline public education "programs" does the operator have?**

1 –	90.6%
2 –	4.5%
3 –	1.5%
Greater than 3 –	3.2%

**2(b): If 2 or more, will separate self-assessments be completed for each program?**  
 [Although relational control between questions was not explicitly applied, it is assumed that those responding to Question 2(b) had indicated they two or more separate programs in response to Question 2(a).]

**Yes – 75.0%**

**3.1: Is the operator aware of the current requirements found in 49 CFR 195 and 49 CFR 192 (as applicable) for carrying out public education programs?**

**Yes – 95.0%**

**3.2(a): Does the operator currently carry out a continuing education program as required by 49 CFR Parts 192 & 195?**

**Yes – 92.2%**

**Does the program enable the following specific audiences (3.2b – 3.2d) to recognize a pipeline emergency and to report it to the operator or the fire, police, or other appropriate public officials:**

**3.2(b): Public?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
3.4%	1.3%	18.0%	22.0%	55.3%

**3.2(c): Appropriate government organizations?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
3.2%	1.5%	15.1%	21.8%	58.2%

**3.2(d): Persons engaged in excavation-related activities?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
4.3%	1.0%	10.9%	19.6%	64.0%

**3.3: Is the operator aware of the public education program requirements found in the Pipeline Safety Improvement Act of 2002 (PSIA 2002)?**

**Yes – 89.7%**

Does the operator currently carry out a continuing education program to educate the public on (3.4a – 3.4f):

3.4(a): Use of a one-call notification system prior to excavation?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
8.7%	2.3%	7.4%	12.6%	69.1%

3.4(b): Damage prevention activities other than use of the one-call notification system?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
14.2%	1.7%	16.0%	19.3%	48.9%

3.4(c): Possible hazards associated with unintended releases from the pipeline facility?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
15.2%	1.7%	19.2%	19.2%	44.7%

3.4(d): Physical indications that such a release may have occurred?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
14.7%	2.4%	18.1%	18.7%	46.1%

3.4(e): Steps that should be taken for public safety in the event of a pipeline release?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
12.5%	1.3%	16.7%	19.4%	50.1%

3.4(f): How to report an event such as a pipeline release?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
8.6%	2.5%	10.9%	20.5%	57.4%

3.5: Is the operator aware of the statutory requirement in the PSIA 2002 that by December 17, 2003, each operator must review its existing public education program for effectiveness and modify the program as necessary?

Yes – 92.2%

3.6(a): Has the operator conducted an initial review for effectiveness of its current pipeline public education program in response to the PSIA 2002?

Yes – 77.0%

3.6(b): Were modifications to the program deemed necessary?

Yes – 68.8%

3.6(c): Has the operator begun making modifications to its public education program?

Yes – 58.8%

#### 4. Program Goals/Objectives and Administration

4.1(a): Does the operator's pipeline public awareness program have defined and documented management objectives?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
24.3%	6.4%	25.0%	12.4%	32.0%

Does the operator's program strive to support the following objectives (4.2a – 4.2g):

4.2(a): Raise the awareness of stakeholders to the presence of pipelines in their community?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
9.0%	3.0%	23.4%	18.4%	46.2%

4.2(b): Raise the awareness of stakeholders in understanding of the role of pipelines in transporting energy?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
20.2%	7.5%	25.5%	15.5%	31.3%

4.2(c): Help the public understand that while pipeline accidents are possible, pipelines are a relatively safe mode of energy transportation?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
16.9%	5.0%	25.1%	18.3%	34.6%

4.2(d): Help the public understand that pipeline operators undertake a variety of measures to prevent pipeline accidents?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
14.7%	6.8%	23.4%	18.9%	36.2%

4.2(e): Help the public understand that pipeline operators anticipate and plan for management of accidents if they occur?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
14.7%	5.6%	25.6%	18.2%	36.0%

4.2(f): Help the public understand the steps that it can take to prevent pipeline emergencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
9.8%	3.5%	21.8%	20.0%	44.9%

4.2(g): Help the public understand the steps that it can take to respond to pipeline emergencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
7.5%	3.2%	22.8%	20.6%	45.9%

Is organizational support for the operator's public awareness program demonstrated by (4.3a – 4.3d):

4.3(a): Management support for the program is [low to high]:

<b>Low</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>High</b>
<b>3.9%</b>	<b>1.4%</b>	<b>12.4%</b>	<b>26.6%</b>	<b>55.6%</b>

4.3(b): Is the program documented in company policies and procedures?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>10.1%</b>	<b>3.8%</b>	<b>21.0%</b>	<b>18.6%</b>	<b>46.4%</b>

4.3(c): Are positions responsible for program administration clearly designated?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>15.1%</b>	<b>3.6%</b>	<b>22.4%</b>	<b>17.0%</b>	<b>41.9%</b>

4.3(d): Are the roles and responsibilities of each position with responsibility for program implementation documented?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>22.2%</b>	<b>5.2%</b>	<b>24.4%</b>	<b>16.1%</b>	<b>32.1%</b>

## 5. Baseline Program Scope and Implementation – Audience Scope & Identification

Does the operator's pipeline public awareness program address the following audiences (5.1a – 5.1d):

5.1(a): Affected Public?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>4.7%</b>	<b>2.9%</b>	<b>21.3%</b>	<b>20.3%</b>	<b>50.9%</b>

5.1(b): Local Public Officials?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>8.6%</b>	<b>3.3%</b>	<b>17.9%</b>	<b>22.9%</b>	<b>47.2%</b>

5.1(c): Emergency Officials?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>3.3%</b>	<b>1.2%</b>	<b>13.0%</b>	<b>23.1%</b>	<b>59.4%</b>



**5.1(d): Excavators?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
5.8%	1.2%	11.1%	20.9%	61.0%

**5.2(a): Does the program documentation establish communication coverage areas (e.g., corridor width and distance) relative to pipeline assets included in the program?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
37.1%	6.2%	21.8%	8.7%	26.2%

What is the coverage area specified by (5.2b – 5.2i):

**5.2(b): LDC Customers?**

**Yes – 32.9%**

**5.2(c): Residents located along distribution systems?**

**Yes – 38.5%**

**5.2(d): Residents located adjacent to transmission pipeline ROW?**

**Yes – 24.9%**

**5.2(e): Residents located on gathering system ROW?**

**Yes – 12.2%**

**5.2(f): Gathering places such as schools and hospitals?**

**Yes – 23.1%**

**5.2(g): 1/8 mile on either side of ROW?**

**Yes – 16.7%**

**5.2(h): Greater than 1/8 mile on either side of ROW?**

**Yes – 9.5%**

**5.2(i): Other?**

**Yes – 11.8%**

**5.3(a): Does the program documentation establish methods to be used to identify the appropriate members of the stakeholder audiences?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
27.6%	6.7%	24.1%	13.2%	28.5%

**Communication Messages, Frequency and Methods**

**5.4(a): Does the operator's program documentation establish guidance regarding the content (i.e., the key messages) to be communicated to each audience?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
19.3%	4.0%	26.2%	15.2%	35.4%

5.4(b): Does the operator's program documentation establish a baseline delivery frequency for communicating to each audience?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
17.9%	4.4%	20.1%	17.7%	39.8%

5.4(c): Does the operator's program documentation establish methods to be used in communicating with each different stakeholder audience?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
21.1%	3.8%	25.4%	15.3%	34.4%

**Program Planning, Implementation and Documentation**

5.5(a): Does the program require periodic development and documentation of a program plan (i.e., communication plan)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
32.9%	4.9%	21.8%	11.5%	28.9%

5.5(b): Does the program require identification of resource requirements (i.e., for plan implementation)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
39.2%	5.5%	20.9%	11.4%	23.1%

5.5(c): What is the length of the period between the developments of new program plans?

1 Year	32.0%
2 Years	6.4%
3 Years	5.3%
Greater than 3 Years	7.4%
N/A	49.9%

5.5(d): Is the operator's program being implemented in accordance with documented program plans and requirements?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
11.3%	3.5%	20.6%	18.8%	45.9%

Documentation of the operator's actual program implementation is developed and maintained, including:

5.5(e): Are the target audiences to whom communications were actually directed identified in the records?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
16.2%	3.2%	21.9%	16.9%	41.8%

For each stakeholder audience is the actual program implementation documented such that the following information is recorded (5.5f – 5.5h):

5.5(f): Actual message type and content (including copies of printed materials distributed)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
12.9%	2.9%	20.2%	15.9%	48.2%

5.5(g): Actual delivery frequencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
15.2%	3.0%	22.4%	16.0%	43.3%

5.5(h): Actual delivery methods?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
13.3%	3.4%	21.5%	17.6%	44.2%

## 6. Program Evaluation and Improvement

6.1(a): Does the operator's public awareness program require periodic assessments to determine if it is being implemented as planned?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
27.1%	6.0%	23.4%	10.4%	33.1%

How are such assessments performed (6.1b – 6.1e):

6.1(b): Internal self-assessments?

Yes – 57.5%

6.1(c): Third-party audits?

Yes – 10.8%

6.1(d): Regulatory inspections?

Yes – 54.8%

6.1(e): Other?

Yes – 4.6%

6.2(a): Does the program require periodic assessments to determine if the program is effective?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
42.1%	7.7%	19.2%	7.9%	23.1%

6.2(b): How frequently are such assessments for program effectiveness to be performed?

1 Year	33.1%
2 Years	5.3%
3 Years	4.4%
Greater than 3 Years	4.0%
N/A	53.2%

6.3(a): Does the program establish internal guidelines for conducting assessments for effectiveness?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
51.2%	5.1%	17.9%	7.9%	17.9%

What aspects of the program are measured to assess whether the program is effective (6.3b – f):

6.3(b): Is the information reaching the intended stakeholder audiences?

Yes – 39.4%

6.3(c): Are the recipient audiences understanding the messages delivered?

Yes – 29.1%

6.3(d): Are the recipient audiences motivated to respond appropriately in alignment with the information provided?

Yes – 24.9%

6.3(e): Is implementation of the program impacting bottom line results (e.g., a reduction in third-party damages)?

Yes – 31.5%

6.3(f): Other?

Yes – 5.1%

6.3(h): Does the program establish requirements or internal guidelines for incorporating effectiveness assessment findings into modifications to the program as necessary?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
51.6%	5.0%	18.1%	7.9%	17.4%

What methods are used to solicit data to determine if the program is being implemented appropriately and if the operator’s public awareness efforts are effective (6.4a – 6.4g):

6.4(a): None?

Yes – 43.0%

6.4(b): Solicitation of input from pipeline personnel?

Yes – 26.8%

6.4(c): Targeted audience surveys?

Yes – 22.0%

6.4(d): Focus groups?

Yes – 4.6%

6.4(e): Bounce-back reply cards?

Yes – 6.6%

6.4(f): Meetings with stakeholders?

Yes – 20.0%

6.4(g): Other?

Yes – 7.8%

6.5: Does the operator's program evaluation process/plan include making use of separate evaluations, in whole or part, sponsored by industry groups or other operators in the region or that otherwise apply?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
62.2%	5.3%	11.5%	6.0%	15.0%

6.6: Does the program require that program changes be documented to describe their nature and the basis for why the modifications were needed?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
57.7%	4.8%	14.0%	6.1%	17.4%

## 7. No Current Program

7(a): If the operator does not currently have a public education/awareness program, how long is expected before a program will be fully developed and implemented?

1 Year	60.0%
2 Years	22.0%
3 Years	6.0%
Greater than 3 Years	12.0%

**Statistics for Hazardous Liquid Operator Responses**

2(a): How many separate pipeline public education "programs" does the operator have?

1 –	85.9%
2 –	8.9%
3 –	1.1%
Greater than 3 –	3.9%

2(b): If 2 or more, will separate self-assessments be completed for each program?

[Although relational control between questions was not explicitly applied, it is assumed that those responding to Question 2(b) had indicated they two or more separate programs in response to Question 2(a).]

**Yes – 80.0%**

3.1: Is the operator aware of the current requirements found in 49 CFR 195 and 49 CFR 192 (as applicable) for carrying out public education programs?

**Yes – 98.8%**

3.2(a): Does the operator currently carry out a continuing education program as required by 49 CFR Parts 192 & 195?

**Yes – 97.1%**

Does the program enable the following specific audiences (3.2b – 3.2d) to recognize a pipeline emergency and to report it to the operator or the fire, police, or other appropriate public officials:

3.2(b): Public?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
1.2%	0.6%	12.7%	28.3%	57.2%

3.2(c): Appropriate government organizations?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
0.6%	0.6%	10.3%	25.3%	63.2%

3.2(d): Persons engaged in excavation-related activities?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.3%	0.6%	6.9%	25.9%	69.4%

3.3: Is the operator aware of the public education program requirements found in the Pipeline Safety Improvement Act of 2002 (PSIA 2002)?

**Yes – 98.3%**

Does the operator currently carry out a continuing education program to educate the public on (3.4a – 3.4f):

3.4(a): Use of a one-call notification system prior to excavation?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
4.5%	0.6%	9.0%	16.4%	69.5%

3.4(b): Damage prevention activities other than use of the one-call notification system?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
9.1%	1.7%	15.3%	19.3%	54.5%

3.4(c): Possible hazards associated with unintended releases from the pipeline facility?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
4.5%	1.7%	14.7%	20.3%	58.6%

3.4(d): Physical indications that such a release may have occurred?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.9%	1.1%	12.0%	21.7%	62.3%

3.4(e): Steps that should be taken for public safety in the event of a pipeline release?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
3.4%	1.1%	13.0%	22.0%	60.5%

3.4(f): How to report an event such as a pipeline release?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.3%	0.6%	8.5%	22.7%	65.9%

3.5: Is the operator aware of the statutory requirement in the PSIA 2002 that by December 17, 2003, each operator must review its existing public education program for effectiveness and modify the program as necessary?

Yes – 97.7%

3.6(a): Has the operator conducted an initial review for effectiveness of its current pipeline public education program in response to the PSIA 2002?

Yes – 89.8%

3.6(b): Were modifications to the program deemed necessary?

Yes – 85.9%

3.6(c): Has the operator begun making modifications to its public education program?

Yes – 78.0%

#### 4. Program Goals/Objectives and Administration

4.1(a): Does the operator's pipeline public awareness program have defined and documented management objectives?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
12.8%	7.6%	26.7%	18.0%	34.9%

Does the operator's program strive to support the following objectives (4.2a – 4.2g):

4.2(a): Raise the awareness of stakeholders to the presence of pipelines in their community?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
3.5%	1.7%	10.4%	23.7%	60.7%

4.2(b): Raise the awareness of stakeholders in understanding of the role of pipelines in transporting energy?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
12.1%	4.1%	16.8%	28.3%	38.7%

4.2(c): Help the public understand that while pipeline accidents are possible, pipelines are a relatively safe mode of energy transportation?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
10.3%	4.0%	17.8%	26.4%	41.4%

4.2(d): Help the public understand that pipeline operators undertake a variety of measures to prevent pipeline accidents?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
5.8%	8.1%	21.3%	25.3%	39.7%

4.2(e): Help the public understand that pipeline operators anticipate and plan for management of accidents if they occur?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
8.6%	2.9%	21.3%	24.1%	43.1%

4.2(f): Help the public understand the steps that it can take to prevent pipeline emergencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.9%	2.9%	10.7%	27.0%	56.3%

4.2(g): Help the public understand the steps that it can take to respond to pipeline emergencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
1.7%	2.9%	13.2%	24.7%	57.5%



Is organizational support for the operator's public awareness program demonstrated by (4.3a – 4.3d):

4.3(a): Management support for the program is [low to high]:

<b>Low</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>High</b>
<b>0.6%</b>	<b>0.0%</b>	<b>9.1%</b>	<b>25.1%</b>	<b>63.4%</b>

4.3(b): Is the program documented in company policies and procedures?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>3.5%</b>	<b>2.9%</b>	<b>19.8%</b>	<b>27.3%</b>	<b>46.5%</b>

4.3(c): Are positions responsible for program administration clearly designated?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>11.0%</b>	<b>4.1%</b>	<b>17.4%</b>	<b>20.3%</b>	<b>47.1%</b>

4.3(d): Are the roles and responsibilities of each position with responsibility for program implementation documented?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>14.0%</b>	<b>6.4%</b>	<b>27.9%</b>	<b>19.2%</b>	<b>32.6%</b>

## 5. Baseline Program Scope and Implementation – Audience Scope & Identification

Does the operator's pipeline public awareness program address the following audiences (5.1a – 5.1d):

5.1(a): Affected Public?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>2.3%</b>	<b>3.5%</b>	<b>16.4%</b>	<b>21.1%</b>	<b>56.7%</b>

5.1(b): Local Public Officials?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>5.2%</b>	<b>3.5%</b>	<b>14.5%</b>	<b>22.7%</b>	<b>54.1%</b>

5.1(c): Emergency Officials?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>1.2%</b>	<b>1.2%</b>	<b>6.4%</b>	<b>23.8%</b>	<b>67.4%</b>

**5.1(d): Excavators?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.9%	2.9%	10.5%	21.5%	62.2%

**5.2(a): Does the program documentation establish communication coverage areas (e.g., corridor width and distance) relative to pipeline assets included in the program?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
22.6%	6.0%	22.0%	14.3%	35.1%

What is the coverage area specified by (5.2b – 5.2i):

**5.2(b): LDC Customers?**

**Yes – 3.9%**

**5.2(c): Residents located along distribution systems?**

**Yes – 6.1%**

**5.2(d): Residents located adjacent to transmission pipeline ROW?**

**Yes – 55.6%**

**5.2(e): Residents located on gathering system ROW?**

**Yes – 20.2%**

**5.2(f): Gathering places such as schools and hospitals?**

**Yes – 28.0%**

**5.2(g): 1/8 mile on either side of ROW?**

**Yes – 36.5%**

**5.2(h): Greater than 1/8 mile on either side of ROW?**

**Yes – 27.5%**

**5.2(i): Other?**

**Yes – 24.7%**

**5.3(a): Does the program documentation establish methods to be used to identify the appropriate members of the stakeholder audiences?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
21.4%	2.9%	30.6%	19.1%	26.0%

**Communication Messages, Frequency and Methods**

**5.4(a): Does the operator's program documentation establish guidance regarding the content (i.e., the key messages) to be communicated to each audience?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
10.5%	2.3%	22.1%	19.2%	46.0%

5.4(b): Does the operator's program documentation establish a baseline delivery frequency for communicating to each audience?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
6.5%	4.2%	22.6%	19.0%	47.6%

5.4(c): Does the operator's program documentation establish methods to be used in communicating with each different stakeholder audience?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
12.1%	1.7%	24.1%	21.3%	40.8%

**Program Planning, Implementation and Documentation**

5.5(a): Does the program require periodic development and documentation of a program plan (i.e., communication plan)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
26.7%	3.5%	22.1%	15.1%	32.6%

5.5(b): Does the program require identification of resource requirements (i.e., for plan implementation)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
30.1%	4.6%	24.3%	13.9%	27.2%

5.5(c): What is the length of the period between the developments of new program plans?

1 Year	38.5%
2 Years	8.9%
3 Years	8.3%
Greater than 3 Years	6.5%
N/A	37.9%

5.5(d): Is the operator's program being implemented in accordance with documented program plans and requirements?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
4.1%	1.2%	18.3%	29.6%	46.7%

Documentation of the operator's actual program implementation is developed and maintained, including:

5.5(e): Are the target audiences to whom communications were actually directed identified in the records?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
8.7%	1.7%	15.1%	21.5%	52.9%

For each stakeholder audience is the actual program implementation documented such that the following information is recorded (5.5f – 5.5h):

5.5(f): Actual message type and content (including copies of printed materials distributed)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
4.1%	0.6%	15.8%	16.4%	63.2%

5.5(g): Actual delivery frequencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
6.4%	1.2%	15.8%	24.0%	52.6%

5.5(h): Actual delivery methods?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
6.4%	2.3%	12.7%	28.1%	50.3%

## 6. Program Evaluation and Improvement

6.1(a): Does the operator's public awareness program require periodic assessments to determine if it is being implemented as planned?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
18.0%	5.2%	29.1%	14.5%	33.1%

How are such assessments performed (6.1b – 6.1e):

6.1(b): Internal self-assessments?

Yes – 68.5%

6.1(c): Third-party audits?

Yes – 13.4%

6.1(d): Regulatory inspections?

Yes – 57.8%

6.1(e): Other?

Yes – 7.8%

6.2(a): Does the program require periodic assessments to determine if the program is effective?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
32.7%	5.3%	23.4%	13.5%	25.1%

6.2(b): How frequently are such assessments for program effectiveness to be performed?

1 Year	41.7%
2 Years	9.2%
3 Years	5.5%
Greater than 3 Years	1.8%
N/A	41.7%

6.3(a): Does the program establish internal guidelines for conducting assessments for effectiveness?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
42.7%	7.0%	24.0%	10.5%	15.8%

What aspects of the program are measured to assess whether the program is effective (6.3b – 6.3f):

6.3(b): Is the information reaching the intended stakeholder audiences?

Yes – 51.6%

6.3(c): Are the recipient audiences understanding the messages delivered?

Yes – 34.8%

6.3(d): Are the recipient audiences motivated to respond appropriately in alignment with the information provided?

Yes – 23.6%

6.3(e): Is implementation of the program impacting bottom line results (e.g., a reduction in third-party damages)?

Yes – 31.4%

6.3(f): Other?

Yes – 8.9%

6.3(h): Does the program establish requirements or internal guidelines for incorporating effectiveness assessment findings into modifications to the program as necessary?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
41.9%	5.4%	24.0%	10.8%	18.0%

What methods are used to solicit data to determine if the program is being implemented appropriately and if the operator’s public awareness efforts are effective (6.4a – 6.4g):

6.4(a): None?

Yes – 22.4%

6.4(b): Solicitation of input from pipeline personnel?

Yes – 48.3%

6.4(c): Targeted audience surveys?

Yes – 31.4%

6.4(d): Focus groups?

Yes – 10.1%

6.4(e): Bounce-back reply cards?

Yes – 16.2%

6.4(f): Meetings with stakeholders?

Yes – 45.5%

6.4(g): Other?

Yes – 11.2%

6.5: Does the operator's program evaluation process/plan include making use of separate evaluations, in whole or part, sponsored by industry groups or other operators in the region or that otherwise apply?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
53.2%	4.0%	17.3%	8.7%	16.8%

6.6: Does the program require that program changes be documented to describe their nature and the basis for why the modifications were needed?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
50.3%	1.8%	20.5%	8.2%	19.3%

7. No Current Program

7(a): If the operator does not currently have a public education/awareness program, how long is expected before a program will be fully developed and implemented?

1 Year	70.6%
2 Years	23.5%
3 Years	5.9%
Greater than 3 Years	0.0%

## Statistics for Gas Transmission Operator Responses

2(a): How many separate pipeline public education "programs" does the operator have?

1 –	92.4%
2 –	3.8%
3 –	1.5%
Greater than 3 –	2.1%

2(b): If 2 or more, will separate self-assessments be completed for each program?

[Although relational control between questions was not explicitly applied, it is assumed that those responding to Question 2(b) had indicated they two or more separate programs in response to Question 2(a).]

Yes – 7.7%

3.1: Is the operator aware of the current requirements found in 49 CFR 195 and 49 CFR 192 (as applicable) for carrying out public education programs?

Yes – 97.7%

3.2(a): Does the operator currently carry out a continuing education program as required by 49 CFR Parts 192 & 195?

Yes – 96.9%

Does the program enable the following specific audiences (3.2b – 3.2d) to recognize a pipeline emergency and to report it to the operator or the fire, police, or other appropriate public officials:

3.2(b): Public?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.8%	0.8%	14.0%	30.1%	52.3%

3.2(c): Appropriate government organizations?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.6%	1.0%	10.2%	28.8%	57.4%

3.2(d): Persons engaged in excavation-related activities?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.0%	1.0%	5.1%	24.2%	67.6%

3.3: Is the operator aware of the public education program requirements found in the Pipeline Safety Improvement Act of 2002 (PSIA 2002)?

Yes – 96.2%

Does the operator currently carry out a continuing education program to educate the public on (3.4a – 3.4f):

3.4(a): Use of a one-call notification system prior to excavation?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
3.0%	0.0%	5.0%	12.1%	79.8%

3.4(b): Damage prevention activities other than use of the one-call notification system?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
6.1%	1.0%	11.9%	27.4%	53.6%

3.4(c): Possible hazards associated with unintended releases from the pipeline facility?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
5.5%	0.8%	17.6%	26.2%	49.9%

3.4(d): Physical indications that such a release may have occurred?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
4.5%	1.3%	15.4%	26.8%	52.0%

3.4(e): Steps that should be taken for public safety in the event of a pipeline release?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
4.3%	1.0%	11.9%	28.3%	54.5%

3.4(f): How to report an event such as a pipeline release?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
3.5%	0.5%	8.4%	27.1%	61.0%

3.5: Is the operator aware of the statutory requirement in the PSIA 2002 that by December 17, 2003, each operator must review its existing public education program for effectiveness and modify the program as necessary?

Yes – 97.4%

3.6(a): Has the operator conducted an initial review for effectiveness of its current pipeline public education program in response to the PSIA 2002?

Yes – 87.1%

3.6(b): Were modifications to the program deemed necessary?

Yes – 83.6%

3.6(c): Has the operator begun making modifications to its public education program?

Yes – 71.6%



#### 4. Program Goals/Objectives and Administration

4.1(a): Does the operator's pipeline public awareness program have defined and documented management objectives?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
18.5%	4.0%	29.8%	17.2%	30.6%

Does the operator's program strive to support the following objectives (4.2a – 4.2g):

4.2(a): Raise the awareness of stakeholders to the presence of pipelines in their community?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
5.0%	2.9%	21.6%	22.1%	45.8%

4.2(b): Raise the awareness of stakeholders in understanding of the role of pipelines in transporting energy?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
15.7%	8.1%	25.9%	20.9%	29.3%

4.2(c): Help the public understand that while pipeline accidents are possible, pipelines are a relatively safe mode of energy transportation?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
12.7%	6.2%	26.0%	23.6%	31.4%

4.2(d): Help the public understand that pipeline operators undertake a variety of measures to prevent pipeline accidents?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
11.5%	6.3%	26.6%	25.3%	30.5%

4.2(e): Help the public understand that pipeline operators anticipate and plan for management of accidents if they occur?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
9.6%	11.7%	23.1%	23.6%	32.0%

4.2(f): Help the public understand the steps that it can take to prevent pipeline emergencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.6%	3.4%	19.7%	28.6%	45.7%

4.2(g): Help the public understand the steps that it can take to respond to pipeline emergencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
3.1%	2.3%	18.7%	27.5%	48.3%

Is organizational support for the operator's public awareness program demonstrated by (4.3a – 4.3d):

4.3(a): Management support for the program is [low to high]:

<b>Low</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>High</b>
<b>1.6%</b>	<b>0.5%</b>	<b>7.3%</b>	<b>29.8%</b>	<b>60.8%</b>

4.3(b): Is the program documented in company policies and procedures?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>5.3%</b>	<b>4.0%</b>	<b>24.8%</b>	<b>20.6%</b>	<b>45.4%</b>

4.3(c): Are positions responsible for program administration clearly designated?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>10.0%</b>	<b>3.7%</b>	<b>25.3%</b>	<b>21.1%</b>	<b>40.0%</b>

4.3(d): Are the roles and responsibilities of each position with responsibility for program implementation documented?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>18.2%</b>	<b>8.7%</b>	<b>27.9%</b>	<b>16.6%</b>	<b>28.7%</b>

## 5. Baseline Program Scope and Implementation – Audience Scope & Identification

Does the operator's pipeline public awareness program address the following audiences (5.1a – 5.1d):

5.1(a): Affected Public?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>2.4%</b>	<b>3.2%</b>	<b>25.0%</b>	<b>22.6%</b>	<b>46.8%</b>

5.1(b): Local Public Officials?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>5.0%</b>	<b>5.5%</b>	<b>20.8%</b>	<b>24.0%</b>	<b>44.7%</b>

5.1(c): Emergency Officials?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>2.6%</b>	<b>1.6%</b>	<b>7.9%</b>	<b>25.3%</b>	<b>62.5%</b>

**5.1(d): Excavators?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.1%	1.3%	9.2%	22.1%	65.3%

**5.2(a): Does the program documentation establish communication coverage areas (e.g., corridor width and distance) relative to pipeline assets included in the program?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
33.8%	9.4%	19.6%	9.7%	27.6%

What is the coverage area specified by (5.2b – 5.2i):

**5.2(b): LDC Customers?**

**Yes – 26.8%**

**5.2(c): Residents located along distribution systems?**

**Yes – 22.6%**

**5.2(d): Residents located adjacent to transmission pipeline ROW?**

**Yes – 53.0%**

**5.2(e): Residents located on gathering system ROW?**

**Yes – 21.6%**

**5.2(f): Gathering places such as schools and hospitals?**

**Yes – 26.8%**

**5.2(g): 1/8 mile on either side of ROW?**

**Yes – 23.8%**

**5.2(h): Greater than 1/8 mile on either side of ROW?**

**Yes – 14.8%**

**5.2(i): Other?**

**Yes – 17.0%**

**5.3(a): Does the program documentation establish methods to be used to identify the appropriate members of the stakeholder audiences?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
25.3%	6.3%	28.7%	16.1%	23.7%

**Communication Messages, Frequency and Methods**

**5.4(a): Does the operator's program documentation establish guidance regarding the content (i.e., the key messages) to be communicated to each audience?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
12.9%	4.5%	26.1%	22.1%	34.5%

5.4(b): Does the operator's program documentation establish a baseline delivery frequency for communicating to each audience?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
11.8%	3.7%	19.5%	24.1%	40.9%

5.4(c): Does the operator's program documentation establish methods to be used in communicating with each different stakeholder audience?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
13.5%	4.7%	24.7%	22.7%	34.4%

**Program Planning, Implementation and Documentation**

5.5(a): Does the program require periodic development and documentation of a program plan (i.e., communication plan)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
31.0%	4.8%	23.6%	14.1%	26.5%

5.5(b): Does the program require identification of resource requirements (i.e., for plan implementation)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
37.9%	5.8%	22.0%	15.1%	19.1%

5.5(c): What is the length of the period between the developments of new program plans?

1 Year	39.8%
2 Years	7.3%
3 Years	4.3%
Greater than 3 Years	4.6%
N/A	44.1%

5.5(d): Is the operator's program being implemented in accordance with documented program plans and requirements?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
7.7%	2.6%	18.5%	26.6%	44.6%

Documentation of the operator's actual program implementation is developed and maintained, including:

5.5(e): Are the target audiences to whom communications were actually directed identified in the records?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
6.3%	2.9%	20.8%	28.9%	41.1%

For each stakeholder audience is the actual program implementation documented such that the following information is recorded (5.5f – 5.5h):

5.5(f): Actual message type and content (including copies of printed materials distributed)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
6.6%	2.4%	15.3%	23.7%	51.6%

5.5(g): Actual delivery frequencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
9.8%	2.4%	18.8%	23.8%	45.2%

5.5(h): Actual delivery methods?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
8.2%	3.2%	18.5%	24.3%	45.8%

## 6. Program Evaluation and Improvement

6.1(a): Does the operator's public awareness program require periodic assessments to determine if it is being implemented as planned?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
18.3%	16.9%	65.1%	27.3%	63.4%

How are such assessments performed (6.1b – 6.1e):

6.1(b): Internal self-assessments?

Yes – 67.5%

6.1(c): Third-party audits?

Yes – 13.0%

6.1(d): Regulatory inspections?

Yes – 61.0%

6.1(e): Other?

Yes – 7.7%

6.2(a): Does the program require periodic assessments to determine if the program is effective?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
43.0%	9.4%	20.9%	7.8%	19.0%

6.2(b): How frequently are such assessments for program effectiveness to be performed?

1 Year	27.6%
2 Years	6.3%
3 Years	4.8%
Greater than 3 Years	2.8%
N/A	58.4%

6.3(a): Does the program establish internal guidelines for conducting assessments for effectiveness?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
51.7%	8.5%	18.9%	8.0%	12.8%

What aspects of the program are measured to assess whether the program is effective (6.3b – 6.3f):

6.3(b): Is the information reaching the intended stakeholder audiences?

Yes – 42.7%

6.3(c): Are the recipient audiences understanding the messages delivered?

Yes – 26.3%

6.3(d): Are the recipient audiences motivated to respond appropriately in alignment with the information provided?

Yes – 22.3%

6.3(e): Is implementation of the program impactings bottom line results (e.g., a reduction in third-party damages)?

Yes – 28.3%

6.3(f): Other?

Yes – 6.2%

6.3(h): Does the program establish requirements or internal guidelines for incorporating effectiveness assessment findings into modifications to the program as necessary?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
51.9%	8.2%	17.1%	7.9%	14.9%

What methods are used to solicit data to determine if the program is being implemented appropriately and if the operator’s public awareness efforts are effective (6.4a – 6.4g):

6.4(a): None?

Yes – 39.4%

6.4(b): Solicitation of input from pipeline personnel?

Yes – 36.4%

6.4(c): Targeted audience surveys?

Yes –24.3%

6.4(d): Focus groups?

Yes – 6.2%

6.4(e): Bounce-back reply cards?

Yes – 8.5%

6.4(f): Meetings with stakeholders?

Yes – 32.4%

6.4(g): Other?

Yes – 10.5%

6.5: Does the operator's program evaluation process/plan include making use of separate evaluations, in whole or part, sponsored by industry groups or other operators in the region or that otherwise apply?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
52.0%	6.5%	11.3%	7.6%	12.6%

6.6: Does the program require that program changes be documented to describe their nature and the basis for why the modifications were needed?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
61.2%	5.8%	11.8%	7.9%	13.4%

## 7. No Current Program

7(a): If the operator does not currently have a public education/awareness program, how long is expected before a program will be fully developed and implemented?

1 Year	63.3%
2 Years	23.3%
3 Years	6.7%
Greater than 3 Years	14.2%

**Statistics for Gas Distribution Operator Responses**

2(a): How many separate pipeline public education "programs" does the operator have?

1 –	92.4%
2 –	3.8%
3 –	1.5%
Greater than 3 –	2.1%

2(b): If 2 or more, will separate self-assessments be completed for each program?  
 [Although relational control between questions was not explicitly applied, it is assumed that those responding to Question 2(b) had indicated they two or more separate programs in response to Question 2(a).]

Yes – 64.7%

3.1: Is the operator aware of the current requirements found in 49 CFR 195 and 49 CFR 192 (as applicable) for carrying out public education programs?

Yes – 96.3%

3.2(a): Does the operator currently carry out a continuing education program as required by 49 CFR Parts 192 & 195?

Yes – 92.7%

Does the program enable the following specific audiences (3.2b – 3.2d) to recognize a pipeline emergency and to report it to the operator or the fire, police, or other appropriate public officials:

3.2(b): Public?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
1.9%	1.5%	18.0%	20.4%	58.3%

3.2(c): Appropriate government organizations?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
2.5%	2.2%	14.4%	21.1%	59.9%

3.2(d): Persons engaged in excavation-related activities?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
1.7%	1.2%	11.3%	17.7%	68.0%

3.3: Is the operator aware of the public education program requirements found in the Pipeline Safety Improvement Act of 2002 (PSIA 2002)?

Yes – 89.8%



Does the operator currently carry out a continuing education program to educate the public on (3.4a – 3.4f):

3.4(a): Use of a one-call notification system prior to excavation?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
7.7%	1.4%	7.1%	12.5%	71.4%

3.4(b): Damage prevention activities other than use of the one-call notification system?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
12.6%	1.8%	15.2%	20.2%	50.1%

3.4(c): Possible hazards associated with unintended releases from the pipeline facility?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
14.6%	2.0%	21.9%	19.2%	42.3%

3.4(d): Physical indications that such a release may have occurred?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
13.9%	3.0%	21.3%	17.7%	44.0%

3.4(e): Steps that should be taken for public safety in the event of a pipeline release?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
11.4%	1.6%	19.2%	18.0%	49.8%

3.4(f): How to report an event such as a pipeline release?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
8.1%	1.5%	11.9%	19.8%	58.8%

3.5: Is the operator aware of the statutory requirement in the PSIA 2002 that by December 17, 2003, each operator must review its existing public education program for effectiveness and modify the program as necessary?

Yes – 92.2%

3.6(a): Has the operator conducted an initial review for effectiveness of its current pipeline public education program in response to the PSIA 2002?

Yes – 76.0%

3.6(b): Were modifications to the program deemed necessary?

Yes – 66.8%

3.6(c): Has the operator begun making modifications to its public education program?

Yes – 55.7%

#### 4. Program Goals/Objectives and Administration

4.1(a): Does the operator's pipeline public awareness program have defined and documented management objectives?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
27.3%	5.0%	2.4%	11.1%	32.5%

Does the operator's program strive to support the following objectives (4.2a – 4.2g):

4.2(a): Raise the awareness of stakeholders to the presence of pipelines in their community?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
11.0%	3.3%	25.6%	15.9%	44.2%

4.2(b): Raise the awareness of stakeholders in understanding of the role of pipelines in transporting energy?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
22.7%	5.9%	28.6%	13.0%	29.8%

4.2(c): Help the public understand that while pipeline accidents are possible, pipelines are a relatively safe mode of energy transportation?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
19.3%	5.5%	26.7%	16.8%	34.0%

4.2(d): Help the public understand that pipeline operators undertake a variety of measures to prevent pipeline accidents?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
16.9%	4.9%	24.6%	18.1%	35.5%

4.2(e): Help the public understand that pipeline operators anticipate and plan for management of accidents if they occur?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
17.1%	4.9%	26.2%	17.9%	33.9%

4.2(f): Help the public understand the steps that it can take to prevent pipeline emergencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
9.4%	3.6%	24.8%	18.9%	43.3%

4.2(g): Help the public understand the steps that it can take to respond to pipeline emergencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
8.5%	3.5%	24.3%	19.7%	43.9%

Is organizational support for the operator's public awareness program demonstrated by (4.3a – 4.3d):

4.3(a): Management support for the program is [low to high]:

<b>Low</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>High</b>
<b>5.4%</b>	<b>1.9%</b>	<b>13.2%</b>	<b>25.2%</b>	<b>54.4%</b>

4.3(b): Is the program documented in company policies and procedures?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>11.4%</b>	<b>4.0%</b>	<b>21.3%</b>	<b>15.2%</b>	<b>48.1%</b>

4.3(c): Are positions responsible for program administration clearly designated?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>18.7%</b>	<b>3.6%</b>	<b>20.8%</b>	<b>14.4%</b>	<b>42.5%</b>

4.3(d): Are the roles and responsibilities of each position with responsibility for program implementation documented?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>25.7%</b>	<b>4.2%</b>	<b>24.2%</b>	<b>12.6%</b>	<b>33.4%</b>

## 5. Baseline Program Scope and Implementation – Audience Scope & Identification

Does the operator's pipeline public awareness program address the following audiences (5.1a – 5.1d):

5.1(a): Affected Public?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>4.6%</b>	<b>2.9%</b>	<b>20.0%</b>	<b>20.3%</b>	<b>52.2%</b>

5.1(b): Local Public Officials?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>7.7%</b>	<b>3.0%</b>	<b>18.2%</b>	<b>23.7%</b>	<b>47.4%</b>

5.1(c): Emergency Officials?

<b>No</b>	←-----→	<b>Weak, Needs Improvement</b>	←-----→	<b>Yes</b>
<b>3.8%</b>	<b>1.2%</b>	<b>13.4%</b>	<b>23.0%</b>	<b>58.6%</b>

**5.1(d): Excavators?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
4.8%	0.8%	11.4%	19.1%	64.0%

**5.2(a): Does the program documentation establish communication coverage areas (e.g., corridor width and distance) relative to pipeline assets included in the program?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
40.4%	7.0%	22.8%	7.3%	22.4%

What is the coverage area specified by (5.2b – 5.2i):

**5.2(b): LDC Customers?**

**Yes – 47.7%**

**5.2(c): Residents located along distribution systems?**

**Yes – 51.1%**

**5.2(d): Residents located adjacent to transmission pipeline ROW?**

**Yes – 14.6%**

**5.2(e): Residents located on gathering system ROW?**

**Yes – 7.0%**

**5.2(f): Gathering places such as schools and hospitals?**

**Yes – 23.6%**

**5.2(g): 1/8 mile on either side of ROW?**

**Yes – 11.1%**

**5.2(h): Greater than 1/8 mile on either side of ROW?**

**Yes – 5.2%**

**5.2(i): Other?**

**Yes – 8.9%**

**5.3(a): Does the program documentation establish methods to be used to identify the appropriate members of the stakeholder audiences?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
30.0%	6.3%	22.7%	12.5%	28.5%

**Communication Messages, Frequency and Methods**

**5.4(a): Does the operator's program documentation establish guidance regarding the content (i.e., the key messages) to be communicated to each audience?**

No	←-----→	Weak, Needs Improvement	←-----→	Yes
21.8%	4.2%	26.5%	12.6%	34.9%

5.4(b): Does the operator's program documentation establish a baseline delivery frequency for communicating to each audience?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
21.3%	4.6%	21.2%	14.9%	38.0%

5.4(c): Does the operator's program documentation establish methods to be used in communicating with each different stakeholder audience?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
24.9%	4.0%	23.3%	13.3%	34.6%

**Program Planning, Implementation and Documentation**

5.5(a): Does the program require periodic development and documentation of a program plan (i.e., communication plan)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
35.2%	5.0%	20.0%	10.5%	29.4%

5.5(b): Does the program require identification of resource requirements (i.e., for plan implementation)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
39.3%	6.0%	20.1%	10.5%	24.2%

5.5(c): What is the length of the period between the developments of new program plans?

1 Year	30.3%
2 Years	5.8%
3 Years	4.3%
Greater than 3 Years	8.8%
N/A	50.8%

5.5(d): Is the operator's program being implemented in accordance with documented program plans and requirements?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
13.0%	4.3%	19.3%	16.1%	47.4%

Documentation of the operator's actual program implementation is developed and maintained, including:

5.5(e): Are the target audiences to whom communications were actually directed identified in the records?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
19.9%	4.0%	21.7%	13.6%	40.8%

For each stakeholder audience is the actual program implementation documented such that the following information is recorded (5.5f – 5.5h):

5.5(f): Actual message type and content (including copies of printed materials distributed)?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
15.1%	3.5%	19.6%	15.3%	46.5%

5.5(g): Actual delivery frequencies?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
17.3%	3.4%	23.2%	13.4%	42.7%

5.5(h): Actual delivery methods?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
14.6%	3.7%	22.3%	14.6%	44.8%

## 6. Program Evaluation and Improvement

6.1(a): Does the operator's public awareness program require periodic assessments to determine if it is being implemented as planned?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
29.9%	6.0%	19.9%	9.3%	34.9%

How are such assessments performed (6.1b – 6.1e):

6.1(b): Internal self-assessments?

Yes – 55.2%

6.1(c): Third-party audits?

Yes – 9.6%

6.1(d): Regulatory inspections?

Yes – 52.7%

6.1(e): Other?

Yes – 3.8%

6.2(a): Does the program require periodic assessments to determine if the program is effective?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
47.1%	5.6%	18.2%	6.1%	23.0%

6.2(b): How frequently are such assessments for program effectiveness to be performed?

1 Year	30.9%
2 Years	4.9%
3 Years	3.4%
Greater than 3 Years	5.3%
N/A	55.8%

6.3(a): Does the program establish internal guidelines for conducting assessments for effectiveness?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
53.1%	3.4%	16.7%	7.7%	18.9%

What aspects of the program are measured to assess whether the program is effective (6.3b – 6.3f):

6.3(b): Is the information reaching the intended stakeholder audiences?

Yes – 35.9%

6.3(c): Are the recipient audiences understanding the messages delivered?

Yes – 29.1%

6.3(d): Are the recipient audiences motivated to respond appropriately in alignment with the information provided?

Yes – 26.8%

6.3(e): Is implementation of the program impactings bottom line results (e.g., a reduction in third-party damages)?

Yes – 35.1%

6.3(f): Other?

Yes – 3.7%

6.3(h): Does the program establish requirements or internal guidelines for incorporating effectiveness assessment findings into modifications to the program as necessary?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
53.5%	3.8%	17.6%	7.8%	17.4%

What methods are used to solicit data to determine if the program is being implemented appropriately and if the operator’s public awareness efforts are effective (6.4a – 6.4g):

6.4(a): None?

Yes – 48.4%

6.4(b): Solicitation of input from pipeline personnel?

Yes – 22.0%

6.4(c): Targeted audience surveys?

Yes – 20.9%

6.4(d): Focus groups?

Yes – 3.9%

6.4(e): Bounce-back reply cards?

Yes – 5.2%

6.4(f): Meetings with stakeholders?

Yes – 15.5%

6.4(g): Other?

Yes – 6.1%

6.5: Does the operator's program evaluation process/plan include making use of separate evaluations, in whole or part, sponsored by industry groups or other operators in the region or that otherwise apply?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
64.5%	3.9%	11.0%	5.3%	15.3%

6.6: Does the program require that program changes be documented to describe their nature and the basis for why the modifications were needed?

No	←-----→	Weak, Needs Improvement	←-----→	Yes
60.5%	4.1%	13.6%	5.0%	18.0%

### 7. No Current Program

7(a): If the operator does not currently have a public education/awareness program, how long is expected before a program will be fully developed and implemented?

1 Year	60.7%
2 Years	18.6%
3 Years	6.6%
Greater than 3 Years	14.2%



## **Statistics for Gathering System Operator Responses**

**Question 2(a): How many separate pipeline public education "programs" does the operator have?**

**Question 2(b): If 2 or more, will separate self-assessments be completed for each program?** [Although relational control between questions was not explicitly applied, it is assumed that those responding to Question 2(b) had indicated they two or more separate programs in response to Question 2(a).]

**Question 3.1: Is the operator is aware of the current requirements found in 49 CFR 195 and 49 CFR 192 (as applicable) for carrying out public education programs?**

**Question 3.2(a): Does the operator currently carry out a continuing education program as required by 49 CFR Parts 192 & 195?**

**Does the program enable the following specific audiences (3.2b – 3.2d) to recognize a pipeline emergency and to report it to the operator or the fire, police, or other appropriate public officials:**

**Question 3.2(b): Public?**

**Question 3.2(c): Appropriate government organizations?**

**Question 3.2(d): Persons engaged in excavation-related activities?**

**Question 3.3: Is the operator aware of the public education program requirements found in the Pipeline Safety Improvement Act of 2002 (PSIA 2002)?**

**Does the operator currently carry out a continuing education program to educate the public on (3.4a – 3.4f):**

**Question 3.4(a): Use of a one-call notification system prior to excavation?**

**Question 3.4(b): Damage prevention activities other than use of the one-call notification system?**

**Question 3.4(c): Possible hazards associated with unintended releases from the pipeline facility?**

**Question 3.4(d): Physical indications that such a release may have occurred?**

**Question 3.4(e): Steps that should be taken for public safety in the event of a pipeline release?**

**Question 3.4(f): How to report an event such as a pipeline release?**

**Question 3.5:** Is the operator aware of the statutory requirement in the PSIA 2002 that by December 17, 2003, each operator must review its existing public education program for effectiveness and modify the program as necessary?

**Question 3.6(a):** Has the operator conducted an initial review for effectiveness of its current pipeline public education program in response to the PSIA 2002?

**Question 3.6(b):** Were modifications to the program deemed necessary?

**Question 3.6(c):** Has the operator begun making modifications to its public education program?

#### **4. Program Goals/Objectives and Administration**

**Question 4.1(a):** Does the operator's pipeline public awareness program have defined and documented management objectives?

**Does the operator's program strive to support the following objectives (4.2a – 4.2g):**

**Question 4.2(a):** Raise the awareness of stakeholders to the presence of pipelines in their community?

**Question 4.2(b):** Raise the awareness of stakeholders in understanding of the role of pipelines in transporting energy?

**Question 4.2(c):** Help the public understand that while pipeline accidents are possible, pipelines are a relatively safe mode of energy transportation?

**Question 4.2(d):** Help the public understand that pipeline operators undertake a variety of measures to prevent pipeline accidents?

**Question 4.2(e):** Help the public understand that pipeline operators anticipate and plan for management of accidents if they occur?

**Question 4.2(f):** Help the public understand the steps that it can take to prevent pipeline emergencies?

**Question 4.2(g):** Help the public understand the steps that it can take to respond to pipeline emergencies?

**Is organizational support for the operator's public awareness program demonstrated by (4.3a – 4.3d):**

**Question 4.3(a):** Management support for the program is [low to high]:

**Question 4.3(b):** Is the program documented in company policies and procedures?

**Question 4.3(c): Are positions responsible for program administration clearly designated?**

**Question 4.3(d): Are the roles and responsibilities of each position with responsibility for program implementation documented?**

## **5. Baseline Program Scope and Implementation – Audience Scope & Identification**

**Does the operator's pipeline public awareness program address the following audiences (5.1a – 5.1d):**

**Question 5.1(a): Affected Public?**

**Question 5.1(b): Local Public Officials?**

**Question 5.1(c): Emergency Officials?**

**Question 5.1(d): Excavators?**

**Question 5.2(a): Does the program documentation establish communication coverage areas (e.g., corridor width and distance) relative to pipeline assets included in the program**

**What is the coverage area specified by (5.2b – 5.2i):**

**Question 5.2(b): LDC Customers?**

**Question 5.2(c): Residents located along distribution systems?**

**Question 5.2(d): Residents located adjacent to transmission pipeline ROW?**

**Question 5.2(e): Residents located on gathering system ROW?**

**Question 5.2(f): Gathering places such as schools and hospitals?**

**Question 5.2(g): 1/8 mile on either side of ROW?**

**Question 5.2(h): Greater than 1/8 mile on either side of ROW?**

**Question 5.2(i): Other?**

**Question 5.3(a): Does the program documentation establish methods to be used to identify the appropriate members of the stakeholder audiences?**

## **Communication Messages, Frequency and Methods**

**Question 5.4(a): Does the operator's program documentation establish guidance regarding the content (i.e., the key messages) to be communicated to each audience?**

**Question 5.4(b): Does the operator's program documentation establish a baseline delivery frequency for communicating to each audience?**

**Question 5.4(c): Does the operator's program documentation establish methods to be used in communicating with each different stakeholder audience?**

### **Program Planning, Implementation and Documentation**

**Question 5.5(a): Does the program require periodic development and documentation of a program plan (i.e., communication plan)?**

**Question 5.5(b): Does the program require identification of resource requirements (i.e., for plan implementation)?**

**Question 5.5(c): What is the length of the period between the developments of new program plans?**

**Question 5.5(d): Is the operator's program being implemented in accordance with documented program plans and requirements?**

**Documentation of the operator's actual program implementation is developed and maintained, including:**

**Question 5.5(e): Are the target audiences to whom communications were actually directed identified in the records?**

**For each stakeholder audience is the actual program implementation documented such that the following information is recorded (5.5f – 5.5h):**

**Question 5.5(f): Actual message type and content (including copies of printed materials distributed)?**

**Question 5.5(g): Actual delivery frequencies?**

**Question 5.5(h): Actual delivery methods?**

### **6. Program Evaluation and Improvement**

**Question 6.1(a): Does the operator's public awareness program require periodic assessments to determine if it is being implemented as planned?**

**How are such assessments performed (6.1b – 6.1e):**

**Question 6.1(b): Internal self-assessments?**

**Question 6.1(c): Third-party audits?**

**Question 6.1(d): Regulatory inspections?**

**Question 6.1(e): Other?**

**Question 6.2(a): Does the program require periodic assessments to determine if the program is effective?**

**Question 6.2(b): How frequently are such assessments for program effectiveness to be performed?**

**Question 6.3(a): Does the program establish internal guidelines for conducting assessments for effectiveness?**

**What aspects of the program are measured to assess whether the program is effective (6.3b – 6.3f):**

**Question 6.3(b): Is the information reaching the intended stakeholder audiences?**

**Question 6.3(c): Are the recipient audiences understanding the messages delivered?**

**Question 6.3(d): Are the recipient audiences motivated to respond appropriately in alignment with the information provided?**

**Question 6.3(e): Is implementation of the program impacting bottom line results (e.g., a reduction in third-party damages)?**

**Question 6.3(f): Other?**

**Question 6.3(h): Does the program establish requirements or internal guidelines for incorporating effectiveness assessment findings into modifications to the program as necessary?**

**What methods are used to solicit data to determine if the program is being implemented appropriately and if the operator's public awareness efforts are effective (6.4a – 6.4g):**

**Question 6.4(a): None?**

**Question 6.4(b): Solicitation of input from pipeline personnel?**

**Question 6.4(c): Targeted audience surveys?**

**Question 6.4(d): Focus groups?**

**Question 6.4(e): Bounce-back reply cards?**

**Question 6.4(f): Meetings with stakeholders?**

**Question 6.4(g): Other?**

**Question 6.5:** Does the operator's program evaluation process/plan include making use of separate evaluations, in whole or part, sponsored by industry groups or other operators in the region or that otherwise apply?

**Question 6.6:** Does the program require that program changes be documented to describe their nature and the basis for why the modifications were needed?

## **7. No Current Program**

**Question 7(a):** If the operator does not currently have a public education/awareness program, how long is expected before a program will be fully developed and implemented?