

SOUTHERN STAR 
CENTRAL GAS PIPELINE

Southern Star Central Gas Pipeline, Inc.

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RECEIVED DEC 13 2011

Robert W. Carlton
Vice President and Chief Compliance Officer

November 21, 2011

Mr. David Barrett
Director, Central Region
Pipeline Hazardous Material Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

Re: CPF 3-2011-1016
CPF 3-2011-1017M

Dear Mr. Barrett:

On October 21, 2011, Southern Star Central Gas Pipeline received a Notice of Probable Violation (NOPV), a Notice of Amendment (NOA) and a Proposed Compliance Order. This was in response to a Public Awareness Audit conducted at our headquarters in Owensboro, KY on July 12, 13, and 14, 2011.

We have reviewed the NOPV, NOA, and the Proposed Compliance Order and have determined not to contest any of the findings. Southern Star would like to offer the following as a means of addressing each of the issues outlined therein:

NOPV and Proposed Compliance Order

1. **Southern Star did not complete an annual audit for Plan Year 2006 and 2008 as required by API RP 1162. Southern Star assumed that submitting the 2006 Public Awareness Plan (PAP) to PHMSA Clearinghouse for review complied with an annual audit for Year 2006. Southern Star was unable to provide documentation to demonstrate that annual audits were performed for Plan Year 2006 or 2008.**

Southern Star will make the necessary changes to our Public Awareness Program (PAP) to ensure a specific deadline for conducting annual self-assessments. This deadline will be set to take place on or before December 31 of each calendar year for which it coincides. The recommendations and observations from the annual self-assessment must be reviewed by the Public Awareness Team (PAT) no later than January 31st of the year following the completion of the review. Documentation of the required corrections to the PAP will be provided in a redlined document and will be captured in the Change Log. The Program Implementation Timeline will track future implementation deadlines for conducting annual self-assessments.

2. **Southern Star failed to follow their PAP procedure for program administration. Southern Star failed to use their established and defined team to ensure the development, implementation, and ongoing oversight of the public awareness program was done in accordance with their established procedures. The 2010 Annual Audit was completed by a single individual.**

While Table 8-1 in RP 1162 allows operators various methods to conduct annual self-assessments (internal review, third-party assessment, or regulatory inspection), the RP is not clear whether the internal review can be conducted by an individual or by a group of individuals within the company. The Southern Star PAP, however, defines this process to be conducted by the Public Awareness Team (PAT) in Section VII (Program Enhancement), while Section X (Program Evaluation) does not clearly define this process with respect to involvement of the PAT. Southern Star will amend the PAP to include specific wording in Section X (Program Evaluation) to reflect use of the PAT in the annual self-assessment process. Documentation of the required corrections to the PAP will be provided in a redlined document and will be captured in the Change Log.

Also, Southern Star did not provide documentation that the annual audit recommendations were implemented or show there was a process in place to track the implementation of the audit recommendations.

This issue was first addressed in both the Gap Analysis and Effectiveness Evaluation which were conducted by an outside consultant in 2010. As a result, a Program Implementation Timeline was designed to track and follow the implementation of audit and other recommendations for continuous improvement to the company's PAP. A copy of this Timeline has been provided in this correspondence for review and approval. Southern Star will amend the PAP to include specific wording in Section VIII (Program Implementation) to describe the process used to track the implementation of the annual self-assessment recommendations. This will be achieved through tracking on the Program Implementation Timeline. Documentation of the required corrections to the PAP will be provided in a redlined document and will be captured in the Change Log. The Program Implementation Timeline will track future implementation deadlines of annual self-assessment recommendations.

In response to #1 of the Compliance Order, Southern Star will review the recommendations for all annual self-assessments conducted between 2006 – 2010, and provide documentation of implementation no later than August 31, 2012¹. The Program Implementation Timeline has incorporated the recommendations from these self-assessments and will track their timely implementation, based on the established deadlines.

¹There are a number of recommendations contained in these self-assessments which require a considerable amount of time to implement. This will most likely lead to implementation past the August 31, 2011 deadline. For this reason, Southern Star would respectfully request an extension of this deadline to December 31, 2014, based on the deliverables outlined in the Program Implementation Timeline. A copy of this timeline has been provided for consideration.

3. **Southern Star did not complete the baseline effectiveness evaluation within the time period of regulatory guidelines established in API RP 1162. Documentation provided indicates the evaluation was completed on October 18, 2010, four months beyond the required four year interval for evaluation. Southern Star provided no documentation or justification for why the effectiveness evaluation was not completed within the prescribed interval.**

An effectiveness evaluation was conducted on the Southern Star Public Awareness Program on October 18, 2010. The results of the evaluation were reviewed and discussed internally. In 2011, the targeted deliverables were included in a Program Implementation Timeline, which has been provided in this correspondence for review and approval.

In response to #2 of the Compliance Order, Southern Star will submit a written document to the Central Region by December 31, 2011 which outlines the details by which the recommendations from the Effectiveness Evaluation will be implemented. The Program Implementation Timeline has incorporated the recommendations from the Effectiveness Evaluation and will track their timely implementation based on the established deadlines. Documentation will be provided to PHMSA no later than August 31, 2012².

²As mentioned above, there are a number of recommendations contained in the Effectiveness Evaluation which require a considerable amount of time to implement. This will most likely lead to implementation past the August 31, 2012 deadline. For this reason, Southern Star would respectfully request an extension of this deadline to December 31, 2014, based on the deliverables outlined in the Program Implementation Timeline. A copy of this timeline has been provided for consideration.

4. Southern Star failed to adequately measure whether stakeholder audiences understood the content of messages and retained key information from the messages. Southern Star relied primarily on returned survey cards for assessing how well the message content was understood. Southern Star field personnel passed out calendars to the affected public during face-to-face meetings but did not ask questions designed to assess their understanding of the message content. The percentage of responses from stakeholder audiences was low (0.24%).

The Effectiveness Evaluation which was conducted on the Southern Star PAP identified this issue and suggested further analysis of the group meeting data as well as in-house surveys or focus group studies be conducted to better determine understandability of messages (Measure 2 in RP 1162).

In response to #3 of the Compliance Order, Southern Star will work with a vendor to design a survey and submit survey questions and format to PHMSA by December 31, 2011³. This deliverable is also reflected in the Program Implementation Timeline which has been provided in this correspondence for review and approval.

³*Southern Star has determined the best way to measure both Understandability of Messages (Measure 2, RP 1162) as well as Achievement of Bottom-Line Results/Objectives (Measure 4, RP 1162 as outlined in NOPV #7 below) is to re conduct the four-year Effectiveness Evaluation. This would be the best way to re-evaluate all four measures as outlined in RP 1162. A partial survey which focuses on Measures 2 and 4 of RP 1162 would not provide consistent or comprehensive results, given the fact the initial Effectiveness Evaluation was conducted using different data sources. If the Effectiveness Evaluation was conducted again in 2012, then Southern Star would have the added benefit of a comprehensive review as well as comparable data sources for future comparisons.*

A survey of this magnitude requires a great amount of time and organization in order to evaluate these desired goals. The current Program Implementation Timeline recommends completion of this task; review; assessments and continuous improvement recommendations by December 31, 2012. If agreeable to this method of evaluation, Southern Star would respectfully request the four-year deadline for conducting the next Effectiveness Evaluation change from 2014 to 2016 in order to maintain the frequency as outlined in RP 1162.

5. The Southern Star PAP contains a table of Supplemental Activities but no documentation was provided for the implementation of these activities or how these activities would be used for effectiveness evaluation. Also, no documentation was provided for follow-up activities with emergency response and public officials who did not attend training/informational meetings.

Section VII (Program Enhancement), Subsection B of the Southern Star PAP includes a table that identifies the type of supplemental activities that may be considered. In order to address this issue, the written Plan will be amended to include information on how these supplemental activities will be considered in the four-year Effectiveness Evaluation.

Further, the lack of follow-up with Southern Star emergency responders and public officials was also identified in the Effectiveness Evaluation recommendations. The recommendations suggested various methods which can be used to conduct more thorough follow-up with stakeholders who do not attend group meetings. An action item was identified in the Program Implementation Timeline, to monitor and increase attendance at group meetings, which has been provided in this correspondence for review and approval.

6. Southern Star did not complete the annual audits in a timely manner so that recommendations could be included in the following year's plan for implementation. Southern Star has performed annual audits for PAP Years 2007, 2009 and 2010 in September 2008, November 2010 and April 2011, respectively.

This issue was identified by a Gap Analysis conducted on the PAP in 2010. In order to address this issue, the written Plan will be amended in Section X (Program Evaluation) to include information on how these annual self-assessments will be conducted in a timely manner so that applicable recommendations can be included in the following year's plan for implementation. In addition, an action item has been included in the Program Implementation Timeline, for completion of annual self-assessments by December 31 of each calendar year for which it coincides. This will ensure timely completion of these assessments moving forward. Documentation of the required corrections to the PAP will be provided in a redlined document and will also be captured in the Change Log. The Program Implementation Timeline will track future implementation deadlines for conducting annual self-assessments in a timely manner.

7. The Southern Star PAP listed six Objectives but the data collection efforts, data analysis and effectiveness evaluation process does not measure bottom-line results to achieve the six Objectives listed in the PAP.

The six objectives listed in Section II of the Southern Star PAP are in alignment with those outlined in Sec. 2.1 of RP 1162. The Effectiveness Evaluation conducted on the Southern Star PAP identified difficulty in assessing bottom-line results and suggested increased survey findings may be an option to assist in the overall determination in evaluating bottom-line results. The Effectiveness Evaluation suggested this could be accomplished in the next four-year cycle assessment period⁴ (June 2014), by designing a methodology to increase input from the various stakeholder audiences. It was suggested this could take the form of additional surveys (written, phone, etc.) to all of the four stakeholder audiences. The intent of this survey would be to provide Southern Star with more in-depth insight regarding the effectiveness of its programs. This is also reflected in the creation of an action item which is included in the Program Implementation Timeline, which has been provided in this correspondence for review and approval.

⁴As mentioned in NOPV #4 above (and in response to #4 of the Compliance Order), Southern Star has proposed a solution which will address this concern. This can be accomplished through re-conducting the four-year Effectiveness Evaluation, which would allow Southern Star to re-evaluate all four measures as outlined in RP 1162. As mentioned earlier, a partial survey which focuses solely on Measures 2 and 4 of RP 1162 would not provide consistent or comprehensive results, given the fact the initial Effectiveness Evaluation was conducted using different data sources.

If agreeable to this solution, Southern Star respectfully requests the four-year deadline for conducting the next Effectiveness Evaluation to change from 2014 to 2016 in order to maintain the frequency as outlined in RP 1162.

NOA

1. Southern Star Public Awareness Plan (PAP) procedures did not require adequate documentation of activities that support the Supplement Activities and Liaison with emergency response and public officials. The Southern Star PAP contained a table of Supplemental Activities but the procedure did not require documentation of these activities or how these activities would be used for effectiveness evaluation. The procedure did not require documentation of follow-up activities with emergency response and public officials who did not attend training informational meetings. Southern Star must amend the PAP procedures to require documentation of these activities for use during effectiveness evaluation.

Item #5 of the NOPV addresses this issue. Section VII (Program Enhancement), Subsection B of the Southern Star PAP includes a table that identifies the type of supplemental activities that may be considered. In order to address this issue, the written Plan will be amended to include information on how these supplemental activities will be considered in the four-year Effectiveness Evaluation.

Further, the lack of follow-up with Southern Star emergency responders and public officials was also identified in the Effectiveness Evaluation recommendations. The recommendations suggested various methods which can be used to conduct more thorough follow-up with stakeholders who do not attend group meetings. An action item was identified in the Program Implementation Timeline, to monitor and increase attendance at group meetings, which has been provided in this correspondence for review and approval.

2. Southern Star PAP procedure does not require timely completion of Annual Audits after a plan Year has ended. Southern Star has completed Annual Audits for PAP Years 2007 (completed in September 2008), 2009 (completed in November 2010), and 2010 (completed in April 2011) and developed a list of recommendations for changes to the Plan in each of those years. The procedure does not require that Annual Audits must be completed in a timely manner as close as practicable to the end of the Plan year so that recommendations can be included in the following year's plan for implementation. Southern Star shall amend the PAP to include language that Annual Audits will be completed in a timely manner.

Item #6 of the NOPV addresses this issue. The written Plan will be amended in Section X (Program Evaluation) to include information on how these annual self-assessments will be conducted in a timely manner so that applicable recommendations can be included in the following year's plan for implementation. In addition, an action item will be included in the Program Implementation Timeline, for completion of annual self-assessments by December 31 of each calendar year for which it coincides. This will ensure timely completion of these assessments moving forward. Documentation of the required corrections to the PAP will be provided in a redlined document and will be captured in the Change Log. The Program

Implementation Timeline will track future implementation deadlines for conducting annual self-assessments in a timely manner.

3. **Southern Star PAP procedure for Effectiveness Evaluation does not require adequate measurement of bottom-line results. The PAP lists six Objectives but the procedure does not require data collection efforts, data analysis and effectiveness evaluation processes to be measured against achieving the Plan Objectives. Southern Star must amend the Effectiveness Evaluation process to require a clear connection in gathering data, evaluating data, and measuring results in support of Plan Objectives.**

Item #7 of the NOPV identifies this issue. The six objectives listed in Section II of the Southern Star PAP are in alignment with those outlined in Sec. 2.1 of RP 1162. The Effectiveness Evaluation conducted on the Southern Star PAP identified difficulty in assessing bottom-line results and suggested increased survey findings may be an option to assist in the overall determination in evaluating bottom-line results. The Effectiveness Evaluation suggested this could be accomplished in the next four-year cycle assessment period (June 2014), by designing a methodology to increase input from the various stakeholder audiences. It was suggested this could take the form of additional surveys (written, phone, etc.) to all of the four stakeholder audiences. The intent of this survey would be to provide Southern Star with more in-depth insight regarding the effectiveness of its programs. This is also reflected in the creation of an action item which is included in the Program Implementation Timeline, which has been provided in this correspondence for review and approval.

In addition, Section X (Program Evaluation) of the PAP will be amended to include specific wording which requires information from data collected on the program be used in the overall analysis process to determine if program objectives (bottom-line results) have been achieved. This will be included in the effectiveness evaluation process which occurs every four years.

NOTE: As outlined earlier in NOPV #4 (and in response to #4 of the Compliance Order), Southern Star has proposed to re-conduct the four-year Effectiveness Evaluation, which would allow the re-evaluation of all four measures as outlined in RP 1162. If agreeable to this solution, Southern Star has respectfully requested the four-year deadline for conducting the next Effectiveness Evaluation to change from 2014 to 2016 in order to maintain the frequency as outlined in RP 1162.

4. **Southern Star PAP procedure does not require the use of Action Plans to ensure that recommended changes included in the 2010 Effectiveness Evaluation, completed in October 2010, are implemented. Southern Star must amend the Effectiveness Evaluation process to include a defined process for implementing the recommended changes in a timely manner.**

In order to address this issue, Section X (Program Evaluation) of the written Plan will be amended to include information on how recommended changes or continuous improvement items identified in the four-year effectiveness evaluation will be implemented in a timely manner. In addition, an action item has been included in the Program Implementation Timeline, for assignment and tracking of recommendations or continuous improvement items as a result of the four-year effectiveness evaluation between 12 - 18 months (not to exceed 18 months) of the next calendar year. This will ensure timely completion of these recommendations moving forward.

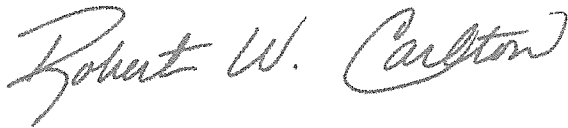
We respectfully ask that you consider the above response to the Notice of Probable Violation and Proposed Compliance Order, and Notice of Amendment that were issued by your office on October 21, 2011. Attached is a copy of Southern Star's Public Awareness Program Implementation Timeline (Timeline) referenced in the response. The Timeline lists the inadequacies from the 2010 Effectiveness Evaluation, recommendations from the Gap Analysis conducted in 2010, as well as issues raised during the 2011 Public Awareness Audit conducted by representatives of your office.

Items for consideration by PHMSA:

- As mentioned in the direct responses above, we have divided the number of issues to be addressed into a three-year action plan. This plan was outlined prior to the 2011 Public Awareness Audit conducted by PHMSA and adjusted to meet the requirements and recommendations that resulted from that audit. Due to the substantial volume of issues identified in the Effectiveness Evaluation, the Gap Analysis, as well as the PHMSA Audit, the timeline was set up on a three-year completion goal. We respectfully ask your consideration of this three-year timeline to adequately address all of the issues that have been identified, rather than the original proposed deadline of August 31, 2012 as noted in the Compliance Order.
- In addition, we have respectfully requested approval for Southern Star to re-conduct the four-year Effectiveness Evaluation. This will allow Southern Star to better evaluate all four measures as listed in RP 1162 instead of looking at isolated Measures 2 and 4 as currently requested. The results of this evaluation will be reviewed and recommendations for continuous improvement will be made based on the findings from this evaluation. If agreeable to this new evaluation date, Southern Star requests the deadline for the next completion of the four-year Effectiveness Evaluation be re-adjusted accordingly from 2014 to 2016.

In accordance with the instructions outlined in "*Response Options for Pipeline Operators in Compliance Proceedings, Article VII, Payment Instructions*," Southern Star will be transmitting a wire transfer in the total amount of \$25,300 in satisfaction of the Civil Penalties as assessed in the Notice of Probable Violation issued October 21, 2011.

Respectfully submitted,



cc: Mike Falk,

Encl: *Public Awareness Program Implementation Timeline (Action Plan)*

TYPE	ACTIVITY/PROGRAM/RECOMMENDATION	TARGET AUDIENCE	INTERNAL DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS/UPDATE
BASELINE	Collaborative brochure mailing	Affected Public Emergency Officials Public Officials* Excavators Farmers Schools	Compliance w/RP 1162	Baseline messages contained in RP 1162 to all stakeholder audiences	Targeted distribution of print materials	Every two years *Frequency for POs is enhanced (5 years)	3/31/12	3/31/14	X	X	X	X	X					BRAD CARTER	Need to determine if we will participate in collaborative or do individual mailing by end of 2011 based on comments from PHNSA inspection regarding collaboratives. Paradigm will conduct focus group study on new insert style for collaborative which will allow more tailored messages from each operator. Based on findings from this study...need to make final decision.
BASELINE	Collaborative brochure mailing	Emergency Officials Excavators Farmers Schools	Compliance w/RP 1162	Baseline messages contained in RP 1162 to all stakeholder audiences	Targeted distribution of print materials	Every two years	6/1/11	3/31/13	X				X					BRAD CARTER	
SUPP/TAL	Group meetings	Emergency Officials* Public Officials* Excavators*	Compliance w/RP 1162	Baseline messages contained in RP 1162 to affected stakeholder audiences	Group meetings	Annual *Frequency for these audiences is enhanced (annual or 3 year requirement)	12/31/11	12/31/12	X	X	X	X	X	X				BRAD CARTER	OK, KS, TX - Paradigm WY, CO - PAPA MO, NE* - Caleritas/Paradigm *Confirm Eff meetings (and documentation) between John O'Toole and Eos in Nuckolls county, NE which will take place end of 2011.
BASELINE	HCA letter mailing	Public Officials Affected Public* Emergency Officials* Farmers Schools (all audiences referenced which are located in HCA counties only)	Compliance w/RP 1162	Baseline messages contained in RP 1162 to Public Official audience	Targeted distribution of print materials	Annual *Frequency for these audiences is enhanced (annual or 2 year requirement)	12/31/11	12/31/12										BRAD CARTER	Need to include all audiences w/in HCA buffers in the 2011 mailing. (Mailings to this audience will begin in 2011 after Gap Analysis suggested implementation of these mailings)
BASELINE	Begin conducting EO meetings in NE counties	Emergency Officials	Compliance w/RP 1162 Gap Analysis recommendation A Gap Analysis conducted on the PAP determined that the EO audience was not sufficiently targeted in NE counties. It was suggested group meetings be used to meet regulatory requirements.	Emergency preparedness communications	Group meetings	Annual	12/31/11	Will be included in group meeting schedule moving forward						X				MITCH JACKSON	Added group meetings in NE counties in 2011.
SUPP/TAL	Request documentation from One-Call Centers	One-Call Centers	Gap Analysis recommendation	Documentation	Documentation of One-Call Center outreach activities from the states with One-Call Center membership and captured and documented accordingly in the Plan.	Annual	12/31/11	12/31/12										BRAD CARTER	Need to contact all state One-Call Centers to obtain documentation of their yearly PA activities. Maintain in documentation records. Note: Not all state One-Call Centers capture this information, so it may not be available in all states.

TYPE	ACTIVITY / PROGRAM / RECOMMENDATION	TARGET AUDIENCE	INTERNAL DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
SUPP/TAL	Request a year-end analysis of surveys conducted in all group meetings held by vendors	Emergency Officials Excavators	PHMSA inspection recommendation A comparative analysis (by year) will help greatly to allow a closer review of trends and other data / extrapolated and utilized in four-year effectiveness evaluations, as well as annual self-assessments. In addition, it can provide useful	General analysis of surveys conducted in group and other meetings.	Group meeting surveys	Annual	12/31/11	12/31/12											Need to discuss with John Funderburk and other vendors who conduct group meetings to request this information. In general, the information should include a breakdown of attendees to these meetings as well as a summary of any survey questions for all counties.
BASELINE	Conduct Annual Self-Assessment	Affected Public Emergency Officials Public Officials Excavators	Compliance w/RRP 1102	Self-Assessment Form. Record the Changes in the Change Log and any recommended changes should be recorded in the Action Plan.	Written assessment	Annual	12/31/11	12/31/12	X									BRAD CARTER	Need to conduct Self-Assessment for 2011
SUPP/TAL	Consider inclusion of a map or some other wording describing the general location of the pipeline	Affected Public	Collaborative mailing improvement A review of the 2008 BRC surveys concluded that while 89% of respondents knew if they lived close to a pipeline, which could be indicative that more work needs to be done regarding the location of	Map or "insert"	Targeted distribution of print materials	One-time action required	12/31/11	NA											Need to discuss with John Funderburk. Paradigm will conduct focus group study on new insert style for collaborative which will allow more tailored messages from each operator. This could even include a map.
SUPP/TAL	Request more emphasis in the collaborative brochure regarding the ROW and recognition issues.	Affected Public	Effectiveness Evaluation Collaborative mailing improvement A review of the 2008 BRC surveys concluded that while 89% of respondents knew if they lived close to a pipeline, which could be indicative that more work needs to be done regarding the location of	Use of clear image of the ROW in the mailer.	Targeted distribution of print materials	One-time action required	12/31/11	NA											Need to follow up with John Funderburk regarding any possible changes to the ROW image and copy used in the AP brochure. Spoke w/John... said the copy of the ROW was disjointing a clear view of the ROW. He will review internally and let us know if there will be any changes regarding the images used for this piece of the mailing. We suggested that the image used in the brochure could possibly be more clear of copy, allowing the reader the ability to visualize better the ROW.
SUPP/TAL	Request more emphasis in the collaborative brochure regarding the ROW and recognition issues.	Public Officials	Effectiveness Evaluation Collaborative mailing improvement A review of the 2008 BRCs concluded there was a high concentration of public officials who can recognize a pipeline ROW. However, 15% of them were unable, which indicates work still needs to be done to increase awareness and recognition of a pipeline ROW.	Use of clear image of the ROW in the mailer.	Targeted distribution of print materials	One-time action required	12/31/11	NA											Need to follow up with John Funderburk regarding any possible changes to the ROW image and copy used in the PO brochure. Spoke w/John... said the copy of the ROW was disjointing a clear view of the ROW. He will review internally and let us know if there will be any changes regarding the images used for this piece of the mailing. We suggested that the image used in the brochure could possibly be more clear of copy, allowing the reader the ability to visualize better the ROW.
SUPP/TAL	Various activities	Affected Public Emergency Officials Public Officials Excavators	National Safe Digging Month (NSDM) is a national push by utilities (CGA members) to help communicate the 811 message. Idea is to have strength in sending out the 811 message in numbers.	811 Damage prevention messages	Website (811 logo) T-Shirts passed out at district offices Banners hung at district locations. Local papers contacted to run 811 message.	Annual	8/1/11	8/1/12					X						Need to determine what efforts will be conducted for 2012 NSDM.

TYPE	ACTIVITY/BROGRAM/ RECOMMENDATION	TARGET AUDIENCE	INTERNAL DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
SUPP/TAL	Create Action Plan to track all PA activities	NA	Gap Analysis recommendation NOV 05, NCA #4 It was suggested we design a method to track all activities that are taking place within the PAP. The result was the creation of this PAP.	Include Public Awareness Program Action Plan in the written Plan.	Update PAP and Action Plan	One-time Action	12/31/11							X				BRAD CARTER	Need to keep Action Plan current and track all projects through this document.
SUPP/TAL	Create a means of tracking all changes that have been made to the PAP.	NA	Gap Analysis, PHMSA Inspection: A way is needed to keep all documentation of the changes to the PAP.	Add to the PAP in Section VIII the use of a Change Log to document the changes that have been made to the PAP. Also include the fact that previous versions of the PAP will be retained for reference as well.	Update PAP and Changes Log	One-time Action	12/31/11							X					
SUPP/TAL	TV advertisement	Affected Public Emergency Officials Public Officials Excavators	New method for approaching all stakeholder audiences to inform them of pipeline safety.	Call 811 prior to digging.	TV advertising	As needed (when the opportunity is available)			X	X	X	X	X					BRAD CARTER	Need to determine if campaign was successful. If so, make recommendation to use again in 2012.
SUPP/TAL	Letter mailing	Landowners	These letters were sent regarding special maintenance projects at various locations along the ROW	Maintenance activity	Targeted distribution of print materials	As needed			X	X	X	X	X					BRAD CARTER	Need to ensure all documentation is complete as well as a description of the event is included in the documentation records for the PA Program. Get with the ROW Department for more information and documentation.
BASELINE	Update written Plan	NA	Gap Analysis recommendation Compliance w/ RP 1162	Add table that better describes pipeline assets to written Plan.	Add asset table to Section IV of the written Plan.	One-time action required	4/1/11	NA						X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	Affected Public	Gap Analysis recommendation Compliance w/ RP 1162 <ul style="list-style-type: none"> Pipeline purpose and reliability Awareness of hazards and prevention measures Right-of-Way (ROW) encroachments One-Call requirements Leak recognition and response Pipeline location information How to get additional information Availability of list of pipeline operators through NPSIS 	Change message type descriptions to more closely mirror those listed under "Affected Public" in RP 1162. Specifically, they should be referenced in the written Plan as follows: <ul style="list-style-type: none"> Pipeline purpose and reliability Awareness of hazards and prevention measures Right-of-Way (ROW) encroachments One-Call requirements Leak recognition and response Pipeline location information How to get additional information Availability of list of pipeline operators through NPSIS 	Revise specific section in written Plan	One-time action required	7/31/11	NA					X				BRAD CARTER	Completed through changes to written Plan in July, 2011.	
BASELINE	Update written Plan	Affected Public	Gap Analysis recommendation Compliance w/ RP 1162	Update written Public Awareness Plan as it does not reference the required baseline stakeholder audience and should be changed to include, "Residents located along transmission pipeline ROW."	Revise specific section in written Plan	One-time action required	7/31/11	NA						X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	Affected Public	Gap Analysis recommendation Compliance w/ RP 1162	Update written Public Awareness Plan. It can include reference to supplemental messages for this audience. Specifically, "residents near storage or other major operational facilities" along with the appropriate message type, delivery frequency and media can be added to this table in the written Plan.	Revise specific section in written Plan	One-time action required	7/31/11	NA						X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.

TYPE	ACTIVITY / PROGRAM / RECOMMENDATION	TARGET AUDIENCE	INTERNAL DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MED A)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
BASELINE	Update written Plan	Public Officials	Compliance w/ RP 1162	<p>Change message type descriptions to more closely mirror those listed under "Public Officials" in RP 1162. Specifically, they should be referenced in the written Plan as follows:</p> <ul style="list-style-type: none"> • Pipeline purpose and reliability • Awareness of hazards and prevention measures • Emergency preparedness communications • One-Call requirements • Pipeline location information and availability of NPMS • How to get additional information 	Revise specific section in written Plan	One-time action required	7/31/11	NA						X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	Public Officials	Gap Analysis recommendation Compliance w/ RP 1162	<p>The supplemental message(s), frequency and activities can be added to this table:</p> <p>Supplemental message: <ul style="list-style-type: none"> • If applicable, provide information about designation of HCA (or other factors unique to segment) and summary of history measures undertaken for that segment. • Maintenance construction activity </p> <p>Supplemental frequency: <ul style="list-style-type: none"> • If in HCA, then annual contact to appropriate public safety officials • Otherwise, as appropriate to level of activity or upon request </p> <p>Supplemental activity: <ul style="list-style-type: none"> • Personal contact • Telephone calls • Videos and CDs </p>	Revise specific section in written Plan	One-time action required	7/31/11	NA						X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	Emergency Officials	Gap Analysis recommendation Compliance w/ RP 1162	<p>Change message type descriptions to more closely mirror those listed under "Emergency Responders" in RP 1162. Specifically, they should be referenced in the written Plan as follows:</p> <ul style="list-style-type: none"> • Pipeline purpose and reliability • Awareness of hazards and prevention measures • Emergency preparedness communications • Potential hazards • Pipeline location information and availability of NPMS • How to get additional information 	Revise specific section in written Plan	One-time action required	7/31/11	NA						X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	Excavators	Compliance w/ RP 1162	<p>Change message type descriptions to more closely mirror those listed under "Emergency Responders" in RP 1162. Specifically, they should be referenced in the written Plan as follows:</p> <ul style="list-style-type: none"> • Pipeline purpose and reliability • Awareness of hazards and prevention measures • Damage prevention awareness • One-Call requirements • Leak recognition and response • How to get additional information 	Revise specific section in written Plan	One-time action required	7/31/11	NA						X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.

TYPE	ACTIVITY / PROGRAM / RECOMMENDATION	TARGET AUDIENCE	INTERNAL DRIVER	MESSAGE COMMENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
BASELINE	Update written Plan	Excavators	Gap Analysis recommendation Compliance w/ RP 1162	Change information to include Land Developers as a supplemental stakeholder audience. This would include the corresponding supplemental message(s) as well as frequency and delivery methods. For more information, see RP 1162, Table 2-1.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X					MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	Excavators	Gap Analysis recommendation Compliance w/ RP 1162	Change the frequency. The correct frequency should read (under the One-Call Center stakeholder audience), "Requirements of the applicable One-Call Center", not "Annual" as it is currently listed.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X					MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	Excavators (Land Developers)	Gap Analysis recommendation	Include Land Developer to the table as a supplemental stakeholder audience. This would include the corresponding supplemental message(s) as well as frequency and delivery methods. For more information, see RP 1162, Table 2-1.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X					MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	One-Call Centers	Gap Analysis recommendation	RP 1162 requirements state that the baseline delivery frequency for One-Call Centers is "Requirements of the applicable One-Call Center". The current Plan states, "annual" and should be changed to better reflect the regulations.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X					MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	Affected Public Emergency Officials Public Officials Excavators	Gap Analysis recommendation	Addition of trigger points within the "criteria" section of the Table in the written Plan.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X					MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	Vendors	Gap Analysis recommendation	Include Table that references all current and updated lists of vendors used in the design, implementation, evaluation and documentation of the Public Awareness Plan.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X					MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update written Plan	NA	Gap Analysis recommendation	The written Plan should include a more detailed program evaluation process, including the evaluation objectives, methodology to be used to perform the evaluation and analysis of the results, and criteria for program improvement based on the results of the evaluation.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X					MITCH JACKSON	Completed through changes to written Plan in July, 2011.
BASELINE	Update Written Plan	NA	NOPV #4 and #2 and #5; RP 1162, GAP Analysis, NDA #2	The PAP should be revised to ensure a specific deadline for conducting annual self-assessments. The PAP should also be updated to include specific wording in Section X (Program Evaluation) to reflect the use of the PAT in annual audits.	Revise specific section in written Plan	One-time action required	12/31/11	NA					X						
BASELINE	Update to written Plan	NA	Gap Analysis recommendation Effectiveness Evaluation recommendation	Self-assessments (internal audits) should be conducted annually and use of the updated internal form (Form SSCGP-1500) will assist in capturing more accurate information regarding the public awareness Plan.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X					MITCH JACKSON	Completed through changes to written Plan in July, 2011.

TYPE	ACTIVITY/PROGRAM/ RECOMMENDATION	TARGET AUDIENCE	INTERVIEWER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDI(A))	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS/UPDATE
BASELINE	Update written Plan	Affected Public Emergency Officials Public Officials Excavators	Gap Analysis recommendation Compliance w/ RP 1162	Consider adding information regarding program effectiveness to more clearly match those listed in RP 1162, Sec. 3.4.1 - 3.4.4.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.	
BASELINE	Update written Plan	Affected Public Emergency Officials Public Officials Excavators	Gap Analysis recommendation	Add (or incorporate into existing action) procedures for the review, modification, implementation and documentation of continuous improvement in the written Plan.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.	
BASELINE	Update written Plan	Emergency Officials	Gap Analysis recommendation	Include formal communication methodologies and procedures regarding contact with 911 operators in the written Plan.	Revise specific section in written Plan	One-time action required	7/31/11	NA					X				MITCH JACKSON	Completed through changes to written Plan in July, 2011.	
BASELINE	Update brochure mailing	Emergency Officials	Gap Analysis recommendation	Include wording on communication procedures to 911 operators in the brochure.	Ensure new wording is added to the brochure for next mailing.	One-time action required	7/31/11	NA					X				BRAD CARTER	Discussed with Paradigm - they confirmed that wording to 911 operators is incorporated into the new 2012 collaborative brochure.	
SUPP/TAL	Request review of BRC questions	Affected Public	Effectiveness Evaluation Collaborative mailing improvement A review of the 2003 BRC surveys concluded that a majority of the respondents (80%) reported that the BRC Call Back System Barriers were not clearly understood. However, the A.A.A. is a nationally high number of people who do not respond to this question.	In order to possibly decrease the percentage who do not respond during the next survey, it might be helpful to suggest "Not applicable" or some other acceptable terminology for those who respond to this survey, or possibly remove question all together.	BRCs	One-time action required	9/22/11	NA					X				BRAD CARTER	Spoke w/John Funderburk...said that this question was removed because it was not measuring anything in RP 1162.	
SUPP/TAL	Request review of BRC questions	Public Officials	Effectiveness Evaluation Collaborative mailing improvement A review of the 2003 BRC surveys concluded that a good majority of POs indicated they knew who to call in the event of an incident. However, there was still a large number (23% collectively) who do not know who to call, or simply do not respond to this question. This can be an indication that respondents do not understand the BRC questions.	Reinforced messages in the brochure regarding desired response to an incident.	BRCs	One-time action required	9/22/11	NA					X				BRAD CARTER	Spoke w/John Funderburk...said that the question was removed and replaced with "Who would you call in the event of an emergency?"	
SUPP/TAL	Request review of brochure mailing	Affected Public Emergency Officials Public Officials Excavators	Effectiveness Evaluation Collaborative mailing improvement A review of the 2003 BRC surveys concluded there was a considerable amount of respondents in the survey (51%) who stated they would call the One-Call Center in the event of an incident. However, the BRC Call Back System Barriers should be placed on call back the operator and 911. Efforts to increase awareness of 911.	Targeted distribution of print materials	Targeted distribution of print materials	One-time action required	9/22/11	NA					X				BRAD CARTER	Spoke w/John Funderburk...said this question was removed in the new BRC.	
SUPP/TAL	Request review of BRC questions	Affected Public Emergency Officials Public Officials Excavators	Effectiveness Evaluation Collaborative mailing improvement A review of the 2003 BRC surveys concluded that the BRC questions should be designed with more focus on comprehension and understanding of the survey questions. The survey questions should be revised to be clear and concise and other issues concerning image of the operator within an interested stakeholder audience.	Revise questions	Targeted distribution of print materials	One-time action required	9/22/11	NA					X				BRAD CARTER	Discussed this with John Funderburk and he confirmed that the questions were modified based on regulatory feedback. (2011)	

TYPE	ACTIVITY / PROGRAM / RECOMMENDATION	TARGET AUDIENCE	INTERNAL DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
SUPP/TAL	Request review of BRC questions	Affected Public Emergency Officials Public Officials Excavators	Effectiveness Evaluation recommendation Collaborative mailing improvement A review of the 2003 BRC revealed that the BRC did not address the need for a better capture damage prevention awareness and desired behaviors of the stakeholder audience (i.e. recognition / use of 811 number; recognition by sight, sound, hearing, vibration, etc.) PHMSA Inspection (ROPY 15, NON #1	BRC survey questions	BRCs	One-time action required	9/22/11	NA					X					BRAD CARTER	Spoke w/John...said new questions are leaning towards pipeline recognition; digging activities; prevention measures; NPMS.
BASELINE	Update Written Plan	NA		Amend the Plan to include information on how supplemental activities will be implemented and considered in the four year effectiveness evaluation.	Revise specific section in written plan	One-time action required							X						
SUPP/TAL	Consider inclusion of EMTs in areas where VFDs are the primary EO	Emergency Officials	PHMSA Inspection recommendation Contact or inclusion of EMTs in rural (and all) areas where volunteer fire departments are the primary EO might assist in further spreading the targeted messages.	Emergency preparedness communications	Targeted distribution of print materials	One-time action required	9/22/11	NA					X						Spoke w/John...used Naticolls, county NE as an example. This county, for example, does not have an Emergency Response Tech specifically, but believe this person is reached through a different SIC code (9229 - Public Order and Safety not elsewhere classified - it's basically a catch all for ERS that are not fire employees). Basically feel like he is addressing this issue with his current method of audience identification.

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TYPE	ACTIVITY / PROGRAM / RECOMMENDATION	TARGET AUDIENCE	INTERVAL DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
BASELINE	Collaborative brochure mailing	Affected Public Emergency Officials* Public Officials* Excavators Farmers Schools	Compliance w/ RP 1162	Baseline messages contained in RP 1162 to all stakeholder audiences	Targeted distribution of print materials	Every two years *Frequency for POs is enhanced (3 years)	3/31/12	9/31/14	X	X	X	X	X	X	X			BRAD CARTER	If it was determined we will participate in the collaborative mailing, need to work with Paradigm on items to be included in "insert" which will allow more tailored messages about our system, facilities and products.
SUPP/ITAL	Group meetings	Emergency Officials* Public Officials* Excavators*	Compliance w/ RP 1162	Baseline messages contained in RP 1162 to affected stakeholder audiences	Group meetings	Annual *Frequency for these audiences is enhanced (annual or 3 year requirement)	12/31/12	12/31/13	X	X	X	X	X	X	X			BRAD CARTER	OK, KS, TX - Paradigm WY, CO - PAPA MO, NE* - Celeritas/Paradigm *Confirm FTF meetings (and documentation) between John O'Toole and Eos in Nuckolls county, NE which will take place in Q4 2011 Need to include all audiences w/ in HCA buffers in the 2011 mailing.
BASELINE	HCA letter mailing	Public Officials Affected Public Emergency Officials Farmers Schools (all audiences referenced which are located in HCAs counties only)	Compliance w/ RP 1162	Baseline messages contained in RP 1162 to Public Official audience	Targeted distribution of print materials	Annual *Frequency for these audiences is enhanced (annual or 2 year requirement)	12/31/12	12/31/13										BRAD CARTER	(Mailings to this audience will begin in 2011 after Gap Analysis suggested implementation of these mailings)
SUPP/ITAL	Letter mailing	Affected Public/ Domestic customers	A special mailing to domestic customers was delivered in 2008 and 2010. This was initiated due to Gas Management's suggestion to inform the customers of safety measures and potential hazards	Domestic Customer Safety about the potential hazards associated with natural gas and what the customer should do if a hazard should occur.	Targeted distribution of print materials	As needed	12/31/12	12/31/14		X			X					BRAD CARTER	Decision to conduct these mailings every two years.
BASELINE	Conduct Annual Self-Assessment	Affected Public Emergency Officials Public Officials Excavators	Compliance w/ RP 1162	Self-Assessment Form. Record the Changes in the Change Log and any recommended changes should be recorded in the Action Plan.	Written assessment	Annual	12/31/12	12/31/13	X				X					BRAD CARTER	Need to conduct Self-Assessment for 2011
SUPP/ITAL	Design methodology and incorporate into written Plan	Affected Public Emergency Officials Public Officials Excavators	Gap Analysis recommendation Ensure addresses are valid in an effort to determine the effectiveness of Outreach efforts of the PAP (Measure 1, RP 1162)	Design methodology to determine address verification within specified buffers.	To be determined (White Paper or Inclusion in written Plan)	Every Four Years	12/31/12	12/31/16										BRAD CARTER	Need to work on internal methodology to accomplish this task.
BASELINE	Update written Plan Operator/ Employee Participation	SCEP Employees	Gap Analysis recommendation Compliance w/ RP 1162. 2.4.7	Provide information and material to company employees who wish to promote pipeline awareness in their communities.	To be determined	As needed	12/31/12	12/31/13										BRAD CARTER	Need to design program to meet this requirement in RP 1162. Some suggestions are to include information in company newsletter; provide updates to new hires; work into safety meetings; etc.
SUPP/ITAL	Increase buffer for EO audience	Emergency Officials	Gap Analysis recommendation Better communication with EO audience in counties located within 10-miles from pipeline assets. These are normally bordering counties who would not normally receive communication materials.	Baseline messages to this audience	Targeted distribution of print materials	One-time action required	12/31/12	NA										BRAD CARTER	Need to work with Paradigm to increase buffer for this audience. It should be reflected in the next mailing cycle which will occur in 2012.

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TYPE	ACTIVITY / PROGRAM / RECOMMENDATION	TARGET AUDIENCE	INTERNAL DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUPLICATE DATE	NEW/DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
SUPP/TAL	Increase buffer for EX audience	Excavators	Gap Analysis recommendation PHMSA inspection recommendation The buffer for the EX audience is currently listed as, "30 miles either side of the centrifuge," which is acceptable, but not practical. It is generally an accepted notion that excavators are transient and do not generally live near their excavation sites. For this reason, it is recommended that the buffer be increased to 2000 county. (John Fawell) suggested we consider 2000 county plus 100 miles buffer for the EX audience.	NA	Targeted mailings	One-time action required	12/31/12	NA										BRAD CARTER	Need to work with Paradigm to increase buffer for this audience. It should be reflected in the next mailing cycle which will occur in 2012.
BASLINE	Update written Plan	Affected Public Excavators	Gap Analysis recommendation PHMSA inspection recommendation Clearly define methodology for use of English and "other" languages by adding wording/methodology in section VI of the written Plan to more clearly reflect the wording and intent of 49 CFR Parts 192.616 as well as 49 CFR 192.612 (section 2.1), which states that the "language and name used by the significant concentrations of non-English speaking population along the pipeline."	Includes methodology to determine "other" languages in the written Plan.	To be determined (White Paper or inclusion in written Plan)	One-time action required	12/31/12	NA										BRAD CARTER	Need to design methodology to accomplish this task. Some suggestions are to conduct a demographic study which will define triggers for initiation of Spanish or "other" languages commonly spoken along the pipeline assets. (John Fawell) suggested we take a closer look at how the methodology is covered. Wants a more in-depth explanation of the methodology of the process they went through to submit the threshold for English and other languages.
SUPP/TAL	Create methodology to conduct follow-up activity with schools	Schools	Effectiveness Evaluation recommendation PHMSA inspection Obtain increased survey findings to assist in the next PHMSA inspection. Determine if the staff and children both understand the importance of pipeline safety. Inspectors suggested more follow-up on school program to ensure the staff and children both understand the importance of pipeline safety. This will be conducted by the PHMSA inspectors. The PHMSA inspectors will ask about the program as well as discuss how pipeline safety can be incorporated into their safety drills.	Pipeline safety information Emergency execution procedures Leak recognition and response	Meetings with schools located in close proximity to the pipeline ROW.	As needed	12/31/12											BRAD CARTER	Need to Design methodology which will allow increased input from the schools regarding the materials distributed to these audiences. We created follow-up activity regarding school contact. This can be accomplished through the schools. The schools are required to provide valuable damage prevention and pipeline safety information to school officials and students. A methodology can be designed which targets the entire location and sequence of these meetings. The public is alerted to both school officials as well as students about the location of the pipeline and location of their school and surrounding grounds. Schools release characteristics of the products in their pipelines; discuss safety precautions and damage prevention awareness; and most importantly leak recognition and response.
SUPP/TAL	Various activities	Affected Public Emergency Officials Public Officials Excavators	National Safe Digging Month (NSDM) is a national push by operators and other underground utilities (CGA members) to help communicate the 811 message. Ideal is to have strength in sending out the 811 message in numbers.	811 Damage prevention messages	Website (811 logo) T-Shirts passed out at district offices Banners hung at district locations	Annual	8/1/12	8/1/13				X	X					BRAD CARTER	Need to determine what efforts will be conducted for 2012 NSDM.
SUPP/TAL	Design a method to track and follow up on return mails	Affected Public Emergency Officials Excavators	PHMSA inspection recommendation The ability to track return mails will help determine if Outreach is met through the implementation of the PAP	Review and track return mails	Return mails	Annual	12/31/12	12/31/13										BRAD CARTER	Spoke w/John...Return mailings will now be tracked and info provided in the reports. Report will include reasons (vacant lot; not deliverable; etc.) But Paradigm does not do an automatic mailing to them again, because it is not practicable to send a mailing to an address that was already returned. Having every postal address along the line and if any addresses were not deliverable, do not know and no the addresses that were not mailable. Should create trends and compare new addresses to old ones. This process was explained by John. We will take a look at this comparison in 2013.

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TYPE	ACTIVITY / PROGRAM / RECOMMENDATION	TARGET AUDIENCE	INTERNAL DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
SUPP/TAL	Update information on company website Track website traffic	Affected Public Emergency Officials Public Officials Excavators	Gap Analysis recommendation Additional method through the internet to relay important integrity management information to all stakeholders who might inquire about this information.	<ul style="list-style-type: none"> Emergency contact information (company emergency number) should be prominent and accessible from the website. Link(s) to state One-Call Centers or the website phone numbers visibly listed on the website. As it currently stands, this information is provided in a pdf document on the website. Role of pipelines (how they work, product shipped). Pipelines in your community / state info. Uniform color code for markers, underground utilities. Security information (related to pipelines and facilities - facility security measures). FADs. Helpful links in the industry (pipelines 101), etc. Summary of Integrity Management Plan 	Website	Ongoing	12/31/12	12/31/13	X	X	X	X	X					BRAD CARTER	Working with IT on new content for website which is scheduled to come out end of 2011. Also, need to design method to track traffic to these sections of the website. Trends should be tracked and documented accordingly. Any follow up required should also be documented. The methodology should allow Southern Star to capture important data regarding trends in public viewing of the website, as well as inquiries and feedback generated from the website. This information can be used to assess and, if necessary, incrementally improve the effectiveness of the program (and if used correctly, it can provide powerful method for two-way communication between Southern Star and its stakeholders. Some examples of communication are effectiveness evaluation, effectiveness targeted at various stakeholder audiences: information to be provided to various stakeholder audiences regarding pipeline safety, etc. These efforts in addition to others conducted through all Southern Star programs, can help in creating healthy strong relationship with all stakeholder audiences.
SUPP/TAL	Conduct additional surveys regarding effectiveness of the program	Affected Public Emergency Officials Public Officials Excavators	Effectiveness Evaluation recommendation PHMSA Inspection In order to obtain increased survey findings to assist in the overall effectiveness evaluation during the next test period, consider a methodology to increase input from the various stakeholder audiences that provides Southern Star more insight regarding the effectiveness of its programs.	<p>Survey should include, at a minimum, the questions in additional questions which will allow the reporter to learn more in depth information regarding the various programs and activities implemented through the company's Public Awareness Program. In addition, it could include more questions regarding the specific four measures outlined in RP 215.</p>	Written surveys OR Phone surveys	As needed	12/31/12											BRAD CARTER	Determine if there is a need to conduct additional surveys and implement (as necessary). One method might be to first compare 2008 to 2010 BRC returns to see if there are any trends or drastic changes. The inspectors spent a lot of time talking about the data points we are collecting and the records we are creating - a result. The method by which this information is used however, will need to be revised to providing a clear picture of how the data is used. The data collected through the data collection in a format as it can be used effectively in the PMP. Other things to consider: Surveys conducted - are we getting the right data we need for an effectiveness evaluation? Are we asking the right questions, at the BRC, for our effectiveness evaluation questions that deal with the effectiveness evaluation.
SUPP/TAL	Update written Plan	SSCGP Employees	Gap Analysis recommendation PHMSA Inspection recommendation	Provide signature from company management on commitment letter of support (in written Plan).	Signature embedded into Commitment to Safety section located in written Plan.	One-time action required	12/31/11	NA										BRAD CARTER	Need to determine how we will address the concern as a result of the Gap Analysis and comments from the PHMSA inspection. Some possible solutions: electronic signature, separate letter signed annually, etc. (Mike Faulk) wants to see a signature on the management commitment of support. Really want a signed signature and this does not need to be signed each year. Need to include wording in materials provided to vendors which are made available to EOs at group meetings. Also, need to include wording and ERP on the company website. Finally, need to include wording in written Plan which outlines this process.
SUPP/TAL	Update written Plan Provide information in group meetings Include information on company website	Emergency Officials	Gap Analysis recommendation PHMSA Advisory (ADB-10-08)	The method in which copies of the company's Emergency Response Plans (ERPs) are made available should be outlined in the written Plan, as well as be made available to the EOs through the group meetings and included on the company website.	Group meetings Company website	One-time action required	12/31/12	NA										BRAD CARTER	

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TYPE	ACTIVITY / PROGRAM / RECOMMENDATION	TARGET AUDIENCE	INTERNAL DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
SUPP/TAL	Design method to track and monitor one-call data.	One-Call Centers	Gap Analysis recommendation Effectiveness Evaluation recommendation Information gained from pilot one-call tracking can be used to refine supplemental programs. It can also be an indicator of things taking place along the pipeline. The ability to review, track and monitor one-call data can be incorporated and considered in the continuous improvement and strategic development activities of the Southern Star Public Awareness Program.	Incorporate trending data from one-call tracking / monitoring and review data annually.	One-call data spreadsheets	Annual	12/31/12	12/31/13										BRAD CARTER	Need to work with internal departments to design method for tracking this data. Look into Facebook and Twitter as well. Some things to consider in the design of this methodology or system are: o There is no method to determine the timing or percent decrease in number of one-calls. This should be taken into consideration when determining the best method for collection of this data moving forward. o There is no method to determine if there is an increase in activity from one-call data. The data collection method used by Southern Star for the data collection methodology currently being used. o Ability to cross-reference one-call data would allow for flexibility as well as provide more information regarding use of this system in the Southern Star asset centers. In addition, the appropriate data collection method will allow for more accurate data collection or provide a helpful damage prevention information used for the continuous improvement of Southern Star's Public Awareness Program.
SUPP/TAL	Design method to track and monitor near miss, third-party damage and other valuable data	Near Miss data Third-party data	Gap Analysis recommendation Effectiveness Evaluation recommendation The ability to track and monitor this information will provide valuable insight regarding activities taking place along the pipeline. In addition, it will provide insight regarding root causes of these events, which can be incorporated as a trigger into the relevant factors associated with the implementation of the PA Program.	Incorporate trending data from near miss data / third-party damage data and review incident reports/investigations and review data annually.	Near miss data Third-party damage data Incident reports/investigations	Annual	12/31/12	12/31/13										BRAD CARTER	Need to determine what type of processes must take place internally to conduct this activity. Work with the various departments on implementation.
SUPP/TAL	Conduct meetings with Excavators (or other first-, second or third-party stakeholders) at the site of the excavation.	Excavators 1st party stakeholders 2nd party stakeholders 3rd party stakeholders	Gap Analysis recommendations In an effort to decrease the amount and consequence of 1st, 2nd or 3rd party incidents along the line, it might be helpful to conduct meetings with Excavators or other first-, second or third-party stakeholders (at the site of the excavation) when marking and / or digging near the pipeline, assets, facilities or other locations where potential contact or damage is possible.	Damage prevention information 811 messages Pipeline location information	Face-to-face meetings Phone calls	As needed	12/31/12											BRAD CARTER	Need to work internally to determine how this program will work and if it is necessary
SUPP/TAL	Conduct follow up and tracking of Private video mailing	Schools	PHMSA Inspection recommendation This video is a new method for approaching elementary aged children with the damage prevention message and inform them about 811.	811	Videos	As needed	8/23/10					X						BRAD CARTER	Need to conduct follow up on this program as well as measure its success. Once this has occurred, will need to determine if activities along the pipeline warrant additional programs in 2012.
BASELINE	Update written Plan	NA	Gap Analysis recommendation Effectiveness Evaluation recommendation In order to receive complete information regarding the effectiveness of the company's PAP, it is necessary to gather and collect feedback from the various internal and external sources associated with the PAP.	Process for collection and tracking of feedback	Revise specific section in written Plan	One-time action required	12/31/12	NA										BRAD CARTER	Need to include wording in written Plan to reflect method of collection of feedback. Information that clearly defines the company's procedure for collection of feedback from internal (field personnel as well as other areas within the organization that come into contact w/the public) and external sources (websites, one-call centers, incident investigations, etc.) regarding the Plan.
SUPP/TAL	Request documentation from One-Call Centers	One-Call Centers	Gap Analysis recommendation	Documentation records	Documentation collection	Annual	12/31/12	12/31/13										BRAD CARTER	Need to contact all state One-Call Centers to obtain documentation of their yearly PA activities. Maintain in documentation records. Note: Not all state One-Call Centers capture this information, so it may not be available in all states.

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 BASELINE / SUPPLEMENTAL PROGRAM IMPLEMENTATION SCHEDULE

TYPE	ACTIVITY / PROGRAM / RECOMMENDATION	TARGET AUDIENCE	INTERVAL/DRIVER	MESSAGE CONTENT	MESSAGE DELIVERY (MEDIA)	MESSAGE FREQUENCY	DUE DATE	NEXT DUE DATE	2006	2007	2008	2009	2010	2011	2012	2013	2014	ASSIGNED TO	COMMENTS / UPDATE
SUPP/TAL	Design program schedule to participate in Progressive Ag Farm Safety Day programs in towns in which we operate.	Schools	PHMSA inspection recommendation There are other methods by which we can contact school aged children with damage prevention messages. One consideration would be to begin participating in the Progressive Ag Farm Safety Day events that are taking place in towns along our pipeline route.	811	Safety Day Programs	Annual	12/31/12	12/31/13										BRAD CARTER	Need to determine if this is a supplemental program to target in 2012. If so, work with Amber wand the CGA Education Committee to begin participating in this program.
SUPP/TAL	Request a year-end analysis of surveys conducted in all group meetings held by vendors.	Emergency Officials Excavators	PHMSA inspection recommendation A comparative analysis (by year) will help greatly to allow a closer review of trends and other data / information that can be extrapolated and utilized in four-year effectiveness evaluations, as well as annual self-assessments. In addition, it can provide useful information for triggers to supplemental activities that can be conducted on behalf of the operator.	General analysis of surveys conducted in group and other meetings.	Group meeting surveys	Annual	12/31/12	12/31/13										BRAD CARTER	Need to discuss with John Funderburk and other vendors who conduct group meetings to request this information. In general, the information should include a breakdown of attendees to these meetings as well as a summary of any survey questions for all counties.
SUPP/TAL	Request 5-year trending data of BRC questions.	Affected Public Emergency Officials Public Officials Excavators	Effectiveness Evaluation recommendation BRCs from the collaborative mailings should also be reviewed for trends to determine if appropriate actions are or will occur. Any donations from the annual mailing should be tracked and business should be noted and documented in the Southern Star action plan.	BRC survey questions	BRCs	Annual	12/31/12	12/31/13										BRAD CARTER	Need to discuss further with John Funderburk after 2012 mailing is completed. But, spoke w/John Fabout possibly providing us with a 5-year trending data of the BRC questions. A review of these questions will provide us with a better understanding and trending data of the BRC responses.
SUPP/TAL	Design method to increase attendance at group meetings	Emergency Officials Public Officials	Effectiveness Evaluation recommendation, NOPV #5 A review of the 2008 BRCs concluded that there is a high majority of Emergency Responders who are aware of both the pipeline's location as well as identify the ROW. However, there is still a 5% portion of this audience who is not aware, which indicates work still needs to be done regarding awareness levels.	Pipeline location information	Group meetings Phone calls Give-away or promotional items	Annual	12/31/12	12/31/13										BRAD CARTER	Need to determine if there are any additional efforts that might be conducted which will increase attendance at group meetings. This might be accomplished through a program focused on calling EOCs who have traditionally not attended in the past to encourage participation or if it would be more beneficial to provide better quality promotional items or other giveaways (i.e., gift cards, drawings, etc.) will assist in the increase of attendance at group meetings.

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BASELINE	Collaborative brochure mailing	Emergency Officials Excavators Farmers Schools	Compliance w/ RP 1162	Baseline messages contained in RP 1162 to all stakeholder audiences	Targeted distribution of print materials	Every two years	6/1/11	3/31/13	X	X	X	X	X					BRAD CARTER	Need to work with Paradigm to produce this mailing.
SUPP/TAL	Group meetings	Emergency Officials* Public Officials* Excavators*	Compliance w/ RP 1162	Baseline messages contained in RP 1162 to affected stakeholder audiences	Group meetings	Annual *Frequency for these audiences is enhanced (annual or 3 year requirement)	12/31/13	12/31/14	X	X	X	X	X					BRAD CARTER	OK. KS, TX - Paradigm MO, NE* - Celeritas/Paradigm
BASELINE	HCA letter mailing	Public Officials Affected Public* Emergency Officials* Farmers Schools (all audiences referenced which are located in HCAs counties only)	Compliance w/ RP 1162	Baseline messages contained in RP 1162 to Public Official audience	Targeted distribution of print materials	Annual *Frequency for these audiences is enhanced (annual or 2 year requirement)	12/31/13	12/31/14										BRAD CARTER	*Confirm FF meetings (and documentation) between John O'Toole and Eos in Nuckolls county, A which will take place end of 2011. Need to include all audiences w/in HCA buffers in the 2011 mailing. (Mailings to this audience will begin in 2011 after Gap Analysis suggested implementation of these mailings)
SUPP/TAL	Letter mailing	Affected Public / Domestic customers	A special mailing to domestic customers was delivered in 2008 and 2010. This was initiated due to Gas Management's suggestion to inform the customers of safety measures and potential hazards	Domestic Customer Safety about the potential hazards associated with natural gas and what the customer should do if a hazard should occur.	Targeted distribution of print materials	As needed	12/31/13	12/31/14		X								BRAD CARTER	Decision to conduct these mailings every two years.
BASELINE	Update written Plan Operator/ Employee Participation	SECGP Employees	Gap Analysis recommendation Compliance w/ RP 1162- 2.4.7	Provide information and material to company employees who wish to promote pipeline awareness in their communities.	To be determined	As needed	12/31/13	12/31/14										BRAD CARTER	Once program has been designed, will need to continue with implementation as outlined in the written Plan.
BASELINE	Conduct Annual Self-Assessment	Affected Public Emergency Officials Excavators	Compliance w/ RP 1162	Self-Assessment Form. Record the Changes in the Change Log and any recommended changes should be recorded in the Action Emergency preparedness communications	Written assessment	Annual	12/31/13	12/31/14		X		X						BRAD CARTER	Need to conduct Self-Assessment for 2012
SUPP/TAL	Conduct drills or facility tours in HCA counties and other high risk counties.	Emergency Officials	Gap Analysis recommendation Effectiveness Evaluation recommendation Various types of training programs facility tours can support increased communications and relationships with this audience.	Emergency preparedness communications	Drills Facility tours	Annual	12/31/13	12/31/14										BRAD CARTER	Need to design a program that targets EOs in HCA or other high risk areas along the pipeline. This program will feature joint drills and/or facility tours which will allow for better communication within this audience.
SUPP/TAL	Various activities	Affected Public Emergency Officials Public Officials Excavators	National Safe Digging Month (NSDM) is a national push by operators and other underground utilities (CGA members) to help communicate the 811 message. Idea is to have strength in sending out the 811 message in numbers.	811 Damage prevention messages	Website (811 logo) T-Shirts passed out at district offices Banners hung at district locations	Annual	8/7/13	8/1/14				X	X					BRAD CARTER	Need to determine what efforts will be conducted for 2013 NSDM.

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SUPP/TAL	Request documentation from One-Call Centers	One-Call Centers	Gap Analysis recommendation	Documentation records	Documentation collection	Annual	12/31/13	12/31/14											BRAD CARTER	Need to contact all state One-Call Centers to obtain documentation of their yearly PA activities. Maintain in documentation records. Note: Not all state One-Call Centers capture this information, so it may not be available in all states. If determined to be a part of the supplemental program in 2012, continue to participate in these programs in 2013.
SUPP/TAL	Participate in Progressive Ag Farm Safety Day programs in towns in which we operate.	Schools	PHMSA Inspection recommendation There are other methods by which we can contact school aged children with damage prevention messages. One consideration would be to begin participating in the Progressive Ag Farm Safety Day events that are taking place in towns along our pipeline route.	811	Safety Day Programs	Annual	12/31/13	12/31/14											BRAD CARTER	
SUPP/TAL	Request a year-end analysis of surveys conducted in all group meetings held by vendors.	Emergency Officials Excavators	PHMSA Inspection recommendation A comparative analysis (by year) will help greatly to allow a closer review of trends and other data / information that can be extrapolated and utilized in four-year effectiveness evaluations, as well as annual self-assessments. In addition, it can provide useful information for triggers to supplemental activities that can be conducted on behalf of the operator.	General analysis of surveys conducted in group and other meetings.	Group meeting surveys	Annual	12/31/13	12/31/14											BRAD CARTER	Request this information from John Funderburk and others who conduct these group meetings. In general, the information should include a breakdown of attendees to these meetings as well as a summary of any survey questions for all counties.
SUPP/TAL	Request 5-year trending data of BRC questions.	Affected Public Emergency Officials Public Officials Excavators	Effectiveness Evaluation recommendation BRCs from the collaborative meetings should also be reviewed for trends to determine if appropriate actions are (or will) occur. Any deviations from the annual mailing frequency to all four stakeholder audiences should be noted and documented in the Southern Star written plan.	BRC survey questions	BRCs	Annual	12/31/13	12/31/14											BRAD CARTER	Request this information from John Funderburk after 2012 mailing is completed. Need a 5-year trending data of the BRC questions. A review of these questions will provide us with a better understanding and trending data of the BRC responses.
	Design a mechanism to capture feedback from stakeholders who either call in directly to the Southern Star offices, or who request information (or inquiries) from the Southern Star website.	Affected Public Emergency Officials Public Officials Excavators	There is a need for operators to have the ability to track and monitor calls and information requests to the company website. In this manner, they will be better able to track trends and issues relating to their pipeline.	The questions and methodology should take into consideration that the caller or website inquiry may / may not be a targeted stakeholder. Thus, the methodology should include a way to identify whether the caller / website inquiry is a member of the Southern Star targeted stakeholder audience. This can be accomplished by requesting and capturing address / location and other contact information.	Internal surveys or other tracking mechanisms	Annual	12/31/13	12/31/14								X			BRAD CARTER	Research methods to track calls/emails and determine best way to proceed.

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SUPP/TAL	Request review of the placement of 811 messaging in the collaborative with consideration on more emphasis to 811 messages.	Public Officials	Collaborative mailing improvement A review of the 2008 BRC surveys concluded that a clear majority of those Public Officials who responded to the survey question either chose calling 811 or their State One-Call Center before beginning a digging project. This is a good indication they know a call is required before digging in their state.	Messages focused at increasing awareness of 811 or calling Before You Dig within this audience.	Targeted distribution of print materials	One-time action required	12/31/13	NA										BRAD CARTER	Need to discuss with John Funderbur to determine if/how these messages can be increased or emphasized in the collaborative brochure.
SUPP/TAL	Design method to distribute relevant publications to targeted emergency response organizations.	Emergency Officials	Gap Analysis recommendation The distribution of relevant publications (that address emergency response procedures) to those emergency response organizations that participate in drills, exercises, and training events can increase communications and flow of information between us and this audience.	Emergency preparedness communications	Publications	Annual	12/31/13	12/31/14										BRAD CARTER	Need to determine if this program would be helpful in increasing lines of communication with our EOC. If so, design program that will allow us to provide valuable information to this audience. Some examples of publications are: The Pipeline Group Emergency Response Manual; General Information Guide to a Pipeline Emergency (which includes information on how to call 811); Emergency Response Bulletin; website linking from the DOT; and any other internal publications, publications or information that may include information about the company's overall pipeline operation, summary of the chemical properties an associated risks of products transported, and basic safety information regarding to an emergency event involving the pipeline. These publications can also be mailed to those agencies and organizations identified as stakeholders that did not participate in the training events.
SUPP/TAL	Distribute brochures and other relevant information to targeted land permitting and other public offices.	Public Officials	Gap Analysis recommendation The distribution of brochures and other relevant information to land permitting and other targeted public offices can increase awareness of pipeline safety, damage prevention; ROW and land management issues; as well as other targeted areas of concern.	Pipeline safety; damage prevention information; Pipeline location information; ROW encroachment and other land management issues	Handouts/brochures	As needed	12/31/13											BRAD CARTER	Need to determine if this program would be helpful in increasing lines of communication with this audience. If so, design program that will allow us to provide publications and other valuable information to this audience.
SUPP/TAL	Design method to increase outreach efforts with public works agencies.	Public Officials	Gap Analysis recommendation Increased outreach efforts with members of public works as well as other groups within this audience can assist in generating better relationships and transfer of valuable pipeline safety information.	Pipeline safety; damage prevention information; Pipeline location information; ROW encroachment and other land management issues	Group meetings Targeted distribution of print materials	As needed	12/31/13											BRAD CARTER	Need to determine if this program would be helpful in increasing lines of communication with this audience. If so, design program that will allow us to provide publications and other valuable information to this audience.

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BASELINE	Collaborative brochure mailing	Affected Public Emergency Officials* Public Officials* Excavators Farmers Schools	Compliance w/ RP 1162	Baseline messages contained in RP 1162 to all stakeholder audiences	Targeted distribution of print materials	Every two years *Frequency for POs is enhanced (3 years)	3/31/14	3/31/15	X		X		X					BRAD CARTER	If it was determined we will participate in the collaborative mailing, need to work with Paradigm on items to be included in "insert" which will allow more tailored messages about our system, facilities & products.
SUPP/TAL	Group meetings	Emergency Officials* Public Officials* Excavators*	Compliance w/ RP 1162	Baseline messages contained in RP 1162 to affected stakeholder audiences	Group meetings	Annual *Frequency for these audiences is enhanced (annual or 3 year requirement)	12/31/14	12/31/15	X		X		X					BRAD CARTER	OK, KS, TX - Paradigm WY, CO - PAPA MO, NE* - Celeritas/Paradigm *Confirm FTF meetings (and documentation) between John O'Toole and Eos in Mudrolls county, NE which will take place end of 2011.
SUPP/TAL	Letter mailing	Affected Public/ Domestic customers	A special mailing to domestic customers was delivered in 2008 and 2010. This was initiated due to Gas Management's suggestion to inform the customers of safety measures and potential hazards	Domestic Customer Safety about the potential hazards associated with natural gas and what the customer should do if a hazard should occur.	Targeted distribution of print materials	As needed	12/31/14	12/31/15			X							BRAD CARTER	Decision to conduct these mailings every two years.
BASELINE	Conduct internal program to educate employees on public awareness	SSCEP Employees	Gap Analysis recommendation Compliance w/ RP 1162	Provide information and material to company employees who wish to promote pipeline awareness in their communities.	To be Determined	As Needed	12/31/14	12/31/15										BRAD CARTER	Once program has been designed, will need to continue with implementation as outlined in the written Plan.
BASELINE	Conduct Annual Self-Assessment	Affected Public Emergency Officials Public Officials Excavators	Compliance w/ RP 1162	Self-Assessment Form. Record the Changes in the Change Log and any recommended changes should be recorded in the Action Plan.	Written assessment	Annual	12/31/14	12/31/15		X			X					BRAD CARTER	Need to conduct Self-Assessment for 2015
SUPP/TAL	Various activities	Affected Public Emergency Officials Excavators	National Safe Digging Month (NSDM) is a national push by operators and other underground utilities (CSA members) to help communicate the 811 message. Idea is to have strength in sending out the 811 message in numbers.	811 Damage prevention messages	Website (811 logo) T-shirts passed out at district offices Banners hung at district locations	Annual	8/1/14	8/1/15					X	X				BRAD CARTER	Need to determine what efforts will be conducted for 2014 NSDM.
SUPP/TAL	Conduct drills or facility tours in HCA counties and other high risk counties.	Emergency Officials	Gap Analysis recommendation Effectiveness Evaluation recommendation Various types of training programs facility tours can support increased communications and relationships with this audience.	Emergency preparedness communications	Drills Facility tours	Annual	12/31/14	12/31/15										BRAD CARTER	Once program has been designed, will need to continue with implementation as outlined in the written Plan.
SUPP/TAL	Request documentation from One-Call Centers	One-Call Centers	Gap Analysis recommendation	Documentation records	Documentation collection	Annual	12/31/14	12/31/15										BRAD CARTER	Need to contact all state One-Call Center to obtain documentation of their yearly P. records. Note: Not all state One-Call Centers capture this information, so it may not be available in all states.

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SUPP/TAL	Request 5-year trending data of BRC questions.	Affected Public Emergency Officials Public Officials Excavators	Effectiveness Evaluation recommendation BRC from the collaborative mailings should also be reviewed for trends to determine if appropriate actions are for will occur. Any deviations from the annual mailing frequency for all four stakeholder audiences should be noted and documented in the Southern Star written plan.	BRC survey questions	BRCs	Annual	12/31/14	12/31/15										BRAD CARTER	Request this information from John Funderburk after 2014 mailing is completed. Need a 5-year trending data the BRC questions. A review of these questions will provide us with a better understanding and trending data of the BRC responses.
SUPP/TAL	Participate in Progressive Ag Farm Safety Day programs in towns in which we operate.	Schools	PHMSA inspection recommendation There are other methods by which we can contact school aged children with damage prevention messages. One consideration would be to begin participating in the Progressive Ag Farm Safety Day events that are taking place in towns along our pipeline route.	811	Safety Day Programs	Annual	12/31/14	12/31/15										BRAD CARTER	Continue to participate in these program in 2014.
SUPP/TAL	Participate in Progressive Ag Farm Safety Day programs in towns in which we operate.	Schools	PHMSA inspection recommendation There are other methods by which we can contact school aged children with damage prevention messages. One consideration would be to begin participating in the Progressive Ag Farm Safety Day events that are taking place in towns along our pipeline route.	811	Safety Day Programs	Annual	12/31/14	12/31/15										BRAD CARTER	If determined to be a part of the supplemental program in 2012, continue to participate in these programs in 2013