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September 12, 2016

VIA E-MAIL

Mr. Lee Sears
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Re: Collection and Compilation of Water Pipeline Field Performance Data

Dear Dr. Sears:

Thank you very much for the opportunity to review this information and provide our comments.

During the development of the study/survey, there have been numerous public comments. We believe it would be helpful for the public to have access to those comments and the disposition of those comments before the information is sent to the Office of Management and Budget (OMB) because it is unclear to the public if and/or how the prior comments have been addressed in the new study/survey. We also believe that OMB would benefit from the public dissemination of those comments and their disposition, as it will allow the public to provide focused and meaningful comments.

This is particularly true given the manner in which the "pipe related data and information" is presented in Appendix A. We are unclear whether the document listed as Appendix A is a survey, a list of issues that will be included in the final survey instrument, or data that respondents will be asked to provide. We would assume that there will be a survey and/or attempt to standardize the data provided. If that is the case, we think the public would benefit from being able to review and comment on the survey instrument/method of standardization/data analysis before submission to OMB, so that the public can provide informed and meaningful comments.

Many of the past comments have focused on key issues, such as scope, definitions, standards, sampling biases, breadth of data available, causation, the submission of relevant information and the potential harmful impacts of the mischaracterization of data, submission of irrelevant data or public disclosure of certain information. Based upon the materials provided, it is unclear how these important issues have been or will be addressed in the new study/survey. Of course, this is not an exhaustive list but provides a few of the previous concerns that are implicated in the new documents.

Since the public does not know if and/or how these and other issue issues previously raised have been addressed in the new survey/study, we will not repeat those issues that have been raised in our previous public comments dated April 28, 2014, October 30, 2014 and December 1, 2014 that continue to apply to this new study/survey. Those comments are included herein by reference.

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Instead, we have a few observations about the new survey/study that we believe would improve the process and/or data received.

- Consider using nominal thickness as an assumption based on the class of the pipe
- Provide examples of failures
- Provide soil data, as subjective terms like "corrosivity" may create problems
- We are not sure that stray currents and dissimilar materials are Operation and Maintenance factors
- Was the pipe installed with full, partial or no inspection?
- Was special training provided to inspectors and/or laborers?
- Since Virginia Tech is a public institution, it is important to know whether and how Virginia Tech can protect sensitive data from the public. Is Virginia Tech subject to public information requests that a private entity is not subject to? It would be helpful for the public, potential respondents and entities affected by the study to have this information for public comment.
- We believe it would be helpful to collect not only failure/repair information but also the pipe material used and method of corrosion protection (if any) used. This will provide important information about the methods of corrosion protection commonly used in the water works industry throughout the United States, which should assist in the evaluation of the Technical Memorandum.
- It would also be useful to get the opinions of utilities about the effectiveness/service life expectations of the various pipe materials and methods of corrosion control used (if any).

Thank you again for the opportunity to comment on this project. We hope that the above suggestions are helpful and look forward to being able to provide more informed comments.

Sincerely,



Jon R. Runge, CAE
President

JRR/cgs