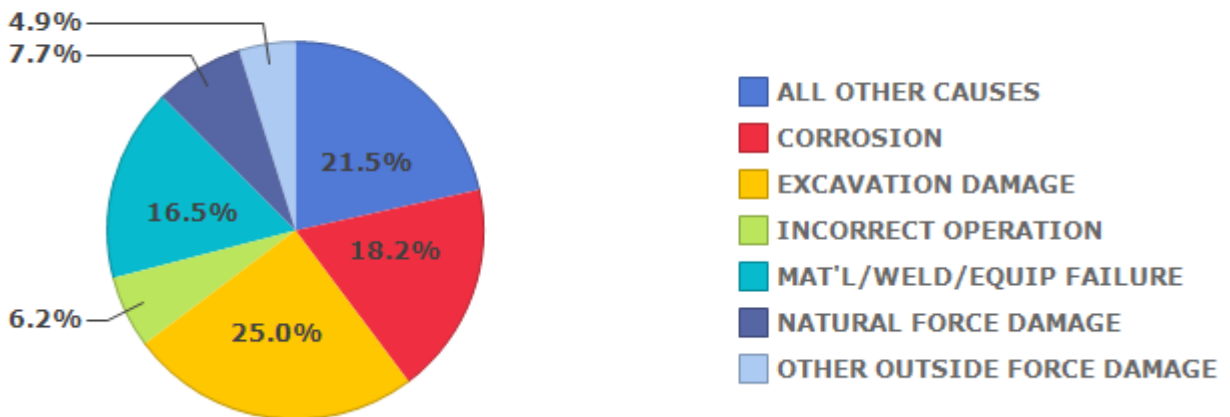


Mr. Gramm,

In response to Mr Blanch's concern over data supporting that excavation is more significant than external corrosion, I would suggest you consider the DOT statistics provided at: [http://primis.phmsa.dot.gov/comm/reports/safety/SigPSIDet\\_1990\\_2009\\_US.html?nocache=1072#\\_all](http://primis.phmsa.dot.gov/comm/reports/safety/SigPSIDet_1990_2009_US.html?nocache=1072#_all). Excavation damage exceeds corrosion damage (both internal & external combined) on average in all pipeline markets. Interestingly enough, 1<sup>st</sup> party damage (i.e., the owner digging their own line) is a greater percentage than almost all causes other than corrosion or miscellaneous.

**Significant Incident Cause Breakdown**  
National, All Pipeline Systems, 1990-2009



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