

American Petroleum Institute
Recommended Practice 1162
Public Awareness Programs for Pipeline Operators

Third Edition (Draft for Ballot)

Change Summary Document

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I. Executive Summary

This change summary document describes changes in the drafted American Petroleum Institute (API) Recommended Practice (RP) 1162, *Public Awareness Programs for Pipeline Operators*, 3rd Edition from the 1st Edition.

The starting point for the 3rd Edition was the 2nd Edition of API RP 1162. Although the 2nd Edition was modified to provide more guidance gained from Industry's implementation of Public Awareness programs, it was not adopted into federal regulation by PHMSA. Consequently, the Task Group used both the 1st and 2nd Editions as reference points in developing the 3rd Edition. Other documents referenced in the development of the 3rd Edition included key takeaways from the PHMSA Strengths Weaknesses Opportunity and Threats (SWOT) Analysis, the API Ad Hoc Team review, and API RP 1173, *Pipeline Safety Management Systems*. The task group also sought input from nationally recognized experts to inform and share leading practices in the portions of the RP that dealt with risk communication, measurement, and measurement engagement.

The scope in the 3rd Edition of RP 1162 covers the development, implementation, evaluation, and documentation of public awareness programs for the following pipelines in the United States:

- Active transmission pipelines
- Local distribution systems
- Gathering pipelines

In addition, the 3rd Edition:

- Clarifies that – as of the time of this publication – operators of non-regulated Class I and II rural gas gathering lines are not required by federal regulation to have a public awareness program, and references operators following API RP 1182 to reference Annex F of the RP to identify which provisions of RP 1162 apply to their systems;
- Refers to additional messaging and frequencies as program supplements rather than program enhancements;
- References the Plan-Do-Check-Act cycle described in API RP 1173, *Pipeline Safety Management Systems* (visit pipelinesms.org for information);
- Provides guidance on additional communications from pipeline operators for certain operational changes that, when initiated, will cause the affected public and emergency officials to recognize and respond differently based on the introduction of a new hazard.

A full summary of changes from the 1st to 3rd Edition can be found in the [Summary Table of Changes found in Section V](#).

II. Historical Perspective

API RP 1162, 1st Edition

The 1st Edition of the API RP 1162 was published in 2003 to provide guidelines for operators on the development, implementation and evaluation of Public Awareness Programs. Although pipeline operators had been conducting pipeline education programs for many years with key stakeholders along their respective routes, there was no consistent guidance for developing and implementing those programs or for evaluating their effectiveness in raising awareness of pipelines and pipeline safety. The 1st Edition task group was comprised of representatives from natural gas and hazardous liquids transmission companies, local distribution companies, gathering companies and trade associations, with input from federal and state pipeline regulators. The 1st Edition of API RP 1162 was incorporated by reference in federal regulations (49 CFR § 192.616 and 49 CFR § 195.440) by the Pipeline and Hazardous Materials Safety Administration (PHMSA) in 2005 and became effective in the regulations in 2006.

API RP 1162, 2nd Edition

The 2nd Edition of API RP 1162 was developed four years after the implementation of public awareness programs under federal regulations that incorporated API RP 1162. Changes were made based on the experiences of stakeholders, including operators from all pipeline segments, and lessons learned during that initial four-year period. Key changes included a focus on core safety information and overall reduction in the number of messages, which was well-supported by research into overall message retention. The 2nd Edition task group was comprised of representatives from natural and other gas and hazardous liquids transmission companies, local distribution companies, gathering companies, trade associations, and federal and state pipeline regulators. The 2nd Edition was published by API in 2010 and reaffirmed in 2015. However, it was not incorporated by reference in federal regulations by PHMSA; pipeline operators were still required to comply with the 1st Edition of API RP 1162.

Key Takeaways from Regulatory Public Awareness Inspections

In 2011, Federal and State pipeline regulators began conducting targeted inspections (using PHMSA Inspection Form 21) on regulated pipeline operators' public awareness programs for effectiveness, based on the 1st Edition of API RP 1162, incorporated by reference in federal regulations. Some general key takeaways noted included (but not limited to):

- Public awareness program objective: inadequate focus on communication of risks, hazards, and potential impacts;
- Stakeholder audiences: missed stakeholder audiences, unclear stakeholder identification processes/verification needed improvement, lack of clarity on coverage areas, information needs;
- Written public awareness programs: duplicative messages, information overload, delivery frequencies, unique attributes, and process for identifying non-English speaking populations;

- Maintaining liaison with emergency response officials: unclear on what liaison means, generic and or inconsistent information shared;
- Program implementation: inadequate documentation of program changes, baseline and supplemental messages and activities, what was required and what was not; and
- Program evaluation: misalignment with program objectives, annual audit – use of regulatory inspection, difficulty measuring behavioral change, and understandability, unclear on acceptable public awareness program effectiveness, inconsistent effectiveness approaches, and unclear methodologies and/or metrics, identifying program changes.

Public Awareness Program Working Group – SWOT Analysis

In 2013, PHMSA formed an industry-wide Public Awareness Program Working Group (PAPWG) to foster public awareness continuous improvements. The diverse working group included representatives from federal and state pipeline safety regulators, gas and hazardous liquids pipeline operator trade associations, municipal gas distribution system operators, emergency response organizations, public safety officials, excavators, and others representing public pipeline safety interests.

The intent of the PAPWG was not to prescribe requirements or mandates. The PAPWG reviewed pipeline public awareness data and information from various sources, performed a “strengths, weaknesses, opportunities, and threats” (SWOT) analyses, and issued a SWOT Analysis Report of key findings on May 16, 2016. The report served as the basis for pipeline safety stakeholders to understand how they may use the information in the report to strengthen future public awareness across the industry. The report is available at: <https://primis.phmsa.dot.gov/comm/publicawareness/docs/PAPWG%20SWOT%20Analysis%20Report-FINAL%2005-16-16.pdf>

API RP 1162 Ad Hoc Group – Summary of Focus

After PHMSA published the Public Awareness SWOT Analysis Report in 2016, an ad hoc group comprised of API, AOPL, INGAA, AGA, CEPA and PHMSA representatives identified a total of 27 risks and 14 themes from the SWOT analysis for consideration in the development of the 3rd Edition of API RP 1162.

API RP 1162 3rd Edition Task Group – Purpose and Focus

ANSI Process: The ANSI process “provides a framework for fair standards development... and safeguards their integrity.” (www.ansi.org)

Task Group Composition: The API RP 1162, 3rd Ed., task group is comprised of representatives from natural and other gas and hazardous liquids transmission companies, local distribution companies, gathering companies, trade associations, emergency response, industry consultants, public awareness vendors, and federal and state pipeline regulators. The Pipeline Safety Trust and Pipeline Safety Coalition were initially members of the task group and participated in kick-off meetings in 2017 but withdrew their participation citing concerns about the process and API’s leadership in the revision of this RP. A concerted effort to increase

diversity among task group members and improve balance – particularly with regards to the voting group to meet ANSI requirements – has been in place since the kick-off in late 2017.

Experts sharing leading practices: In addition to reference documents that were utilized by the task group, nationally recognized experts were identified and utilized to inform or share leading practices for areas of the RP. These experts include:

1. Risk Communication: Dr. Vincent Covello and Tom Wojtecki, Center for Risk Communication. Dr. Covello and Mr. Wojteki were engaged by API to provide the task group with information on risk communication – specifically the communication of risk-based information through education and awareness programs. They also contributed expertise in message mapping.
2. Measurement: Katie Delahaye Paine, Paine Publishing. After an RFP process, Ms. Paine was engaged by API to provide consultant services in the measurement of communication and awareness campaigns and programs. Her work included interviews with operators, stakeholders and regulators; literature review of comparable industry peer programs and their evaluation; and the production of a final report containing recommendations for consideration in the 3rd Edition.
3. Measurement and Engagement: Leah Jaramillo, Jaramillo & Associates. Ms. Jaramillo, who has particular expertise in gaining public input into infrastructure projects, was engaged by API to assist with the creation of a digital platform to seek feedback from members of the affected public on public awareness messaging and test standardized research questions developed to help improve the effectiveness evaluation section of the RP. Ms. Jaramillo also provided information for the task group on the effective use of message delivery methods.

III. API RP 1162 Scope

Outlined in this section are differences in the scope of the 1st, 2nd and 3rd editions of RP 1162. The following provides a brief summary of the scope in each edition.

Summary of the 1st Edition Scope

The 1st edition of RP 1162 provides guidance for public awareness programs for the following pipeline operators:

- Intrastate and interstate hazardous liquids and natural gas transmission pipelines
- Local distribution systems
- Gathering systems

The RP is intended for use in developing and implementing Public Awareness Programs associated with normal operations of existing pipelines. The scope excludes new pipeline construction or communications that occur immediately after a pipeline-related emergency. Additionally, it is not intended to provide guidance to operators for communications about operator-specific performance measures that are addressed through other means of communication or regulatory reporting. The scope specifically designates the stakeholder audiences as affected public, local and state emergency response and planning agencies, local public officials and governing councils and excavators. The scope specifies that mainline pipe, pump and compression stations and other facilities that are associated with the pipeline should be included.

Summary of the 2nd Edition Scope

The 2nd edition of RP 1162 specifies that the document covers the development, implementation, evaluation, and documentation of public awareness programs for the following pipelines:

- Transmission pipelines
- Local distribution systems
- Gathering lines

The 2nd edition scope also calls out that it applies to normal operation of existing pipeline systems and facilities. The scope continued to exclude new pipeline construction and communications that occur immediately after a pipeline-related emergency. The scope is not intended to provide guidance to operators for communications about operator-specific performance measures that are addressed through other means of communication or regulatory reporting and does not apply to offshore operations.

The RP recognizes that there are differences in pipeline conditions, release consequences, affected populations, increased development and excavation activities and other factors associated with individual pipeline systems. The RP provides operator with the elements of a recommended baseline public awareness program and considerations to determine when and how to enhance the program.

Summary of the 3rd Edition Scope

The scope in the 3rd Edition of RP 1162 also specifies that the document covers the development, implementation, evaluation, and documentation of public awareness programs for the following pipelines in the United States:

- Active transmission pipelines
- Local distribution systems
- Gathering pipelines

The scope addresses communication regarding certain operational changes initiated by an operator that require affected public and emergency officials to recognize and respond differently based on the introduction of new pipeline release hazards. The 3rd Edition scope continues to exclude communications related to new pipeline construction, offshore operations, abnormal operations and during emergencies.

This RP recognizes there are differences in pipeline conditions, release consequences, populations, increased development and excavation activities and other factors associated with individual pipeline systems. References to program enhancements are referred to as program supplements in the 3rd Edition.

The scope clarifies that – at the time of this RP – operators of non-regulated Class I and II rural gas gathering lines are not required by federal regulation to have a public awareness program, and references operators following API RP 1182 to reference Annex F of the RP to identify which provisions of RP 1162 apply to their systems.

IV. API RP 1162 (3rd Edition)

General Summary

The Task Group used the RP 1162 1st and 2nd Editions as well as RP 1173 as reference documents for the 3rd Edition of 1162. The inclusion of RP 1173 introduced an iterative four-step approach (Plan, Do, Check, Act, or “PDCA”) used to manage processes and programs. As a result, the 3rd Edition identifies certain sections of the RP by phases according to the PDCA model.

The 3rd Edition also incorporates the terms “can,” “may,” and “should” according to API definitions. There are no “shall” statements in the 3rd Edition.

- The term "can" is used to express possibility or capability; in the RP, “can” is used in lists of examples where the operator has the flexibility to use one, some, none or go beyond the examples provided.
- The term "may" is used to express permission or a provision that is optional; in the RP, “may” provides some flexibility for operators, but – if used in a list of examples – the operator has no flexibility to go outside of that list.
- The term "should" denotes a recommendation or that which is advised but not required in order to conform to the standard; in the RP, “should” is used to make requirements clear, but it also offers operators the ability to deviate with documented justification or rationale for that deviation.

Scope

As previously noted, the scope of the 3rd Edition specifies that the RP applies only to active transmission, local distribution, and gathering pipeline systems in the United States. This language differs from the 1st Edition; with the exception of reference to “active” systems versus “normal operation of existing” systems, this language is aligned with 2nd Edition.

The scope also introduces new language to address certain operational changes that may require additional communication (see “Program Supplements” for more information).

Terms, Definitions, Acronyms, and Abbreviations

Section 3.1 – Terms and Definitions – of the 3rd Edition was reviewed by the Task Group to make sure terms are relevant and, as appropriate, inclusive of new terms introduced in the RP, and to make sure that definitions for all defined terms was correct and easy to understand.

The following terms were added to the 3rd Edition:

- Analysis
- Assessment
- Behavioral Intent
- Census Sampling
- Confidence Level

- Immediately Dangerous to Life and Health (IDLH)
- Liaison
- Margin of Error
- Qualitative Research
- Quantitative Research
- Resident
- Sample

Section 3.2 – Acronyms and Abbreviations – was reviewed by the Task Group for completeness and relevance of terms provided. In the 3rd Edition, with the exception of API (American Petroleum Institute) because of its use in the RP’s title, Acronyms for Trade Associations have been moved to Annex B, Section B.1 – Trade Associations.

The following acronyms or abbreviations have been added to the 3rd edition:

- AP: Affected Public
- EO: Emergency Officials
- EX: Excavators
- PO: Public Officials

Program Establishment

Section 4 – Program Establishment – of the 3rd Edition is more closely aligned with the 1st Edition than the 2nd Edition and introduces a Plan-Do-Check-Act (PDCA) cycle (Figure 1) to public awareness programs.

A significant change to Program Establishment in the 3rd Edition is the removal of the requirement to obtain management support or commitment for an operator’s public awareness program. After review, the Task Group considered this requirement to be unnecessary due to the overall program maturity within each operating company.

Another significant change is the removal of the overall requirement to “Implement Continuous Improvement.” This is replaced with the requirement to establish written program objectives and criteria for determining when program changes are warranted.

Section 4 also introduces languages (Section 4.6.1) on developing audience contact lists, including a stakeholder identification process to determine geographic coverage areas when communicating with the affected public.

Information on languages other than English that should be considered by operators is now included as a specific step in Program Establishment (Section 4.7). Similar language was previously included in the 1st and 2nd Editions, but a need for clarification was reflected in the findings of PHMSA’s SWOT Analysis. Therefore, in addition to identifying a process to determine languages other than English that are commonly understood by a significant number and concentration of the population in their operational area, operators are required to determine

“significant number and concentration” for stakeholder audiences in their operational area and to provide data sources used in identifying appropriate languages.

The Task Group closely reviewed the Stakeholder Audiences, Audience Definitions and examples of each Stakeholder Audience. Although there are no significant changes to the Stakeholder Audiences (i.e., the four primary stakeholder audiences remain: Affected Public, Excavators, Public Officials and Emergency Officials), the Task Group has revised the audience definitions and examples for added clarity.

The task group had considerable discussion on the recommended distance for baseline communication with the affected public stakeholder audience. There were some discussions on whether or not to provide minimum coverage areas and, as a result, the task group decided that providing minimum coverage guidance may be helpful. A sub-group was established to review existing practices and other available information, such as ERG evacuation distances and applicable NTSB recommendations, and returned a recommendation for minimum and maximum distances.

A maximum distance has been added to provide clarity, both for operators and state and federal regulators, on how far an operator can realistically be expected to communicate effectively with their stakeholders.

Product Type	Minimum baseline geographic coverage area	Maximum baseline geographic coverage area
Natural Gas Liquids or Highly Volatile Liquids	660 ft. on either side of pipeline	1 mile on either side of pipeline
Natural Gas (Transmission and Gathering)	660 ft. on either side of pipeline	½ mile on either side of pipeline
Natural Gas (Distribution)	300 ft. on either side of pipeline	Service area
Hazardous Liquids	660 ft. on either side of pipeline	1000 ft. on either side of pipeline
Hydrogen Sulfide (H ₂ S or Sour Gas)	Radius of Exposure (ROE) distances	Radius of Exposure (ROE) distances

Messages

In considering potential changes to messages, the task group reviewed the Public Awareness Program Working Group SWOT Analysis and information from expert consultants on risk communication. The team also completed some message mapping exercises recommended by the expert consultants.

Throughout Section 5, there are several charts of the message topics and which stakeholder audience they apply to, if they are baseline or supplemental messages and which operator types need to deliver the message.

Message Comparison: Baseline Messages														
1st Edition				2nd Edition				3rd Edition						
	AP	EX	PO	EO		AP	EX	PO	EO		AP	EX	PO	EO
Transmission	8	6	6	6	Transmission	6	5	6	5	Transmission	10	11	10	10
Distribution	5	5	4	4	Distribution	5	5	5	4	Distribution	8	10	8	8
Gathering	7	7	6	6	Gathering	5	5	5	5	Gathering	9	11	9	9
Message Comparison: Supplemental Messages														
1st Edition				2nd Edition				3rd Edition						
	AP	EX	PO	EO		AP	EX	PO	EO		AP	EX	PO	EO
Transmission	6	7	3	2	Transmission	5	4	5	4	Transmission	5	3	5	5
Distribution	0	0	0	0	Distribution	4	3	3	5	Distribution	5	4	6	6
Gathering	2	4	3	2	Gathering	4	5	6	3	Gathering	5	3	5	5

The key changes to the messaging requirements in Section 5 include the following:

1. “Commodity type(s) Transported and Potential Hazards” is now a baseline message for all stakeholder audiences and all operator types.
2. “Operator’s Pipeline Safety Compliance Record” is a supplemental message for affected public for Transmission and Gathering operators.
3. “Pipeline Purpose and Reliability” has been changed to a supplemental message for all stakeholder audiences and all operator types.
4. Information and/or overview of operator’s Integrity Management Program has been removed as a message topic.
5. “Sharing Pipeline Safety Information” is now a baseline message for excavators and emergency officials and has been added as a supplemental message for affected public and public officials.
6. “ROW/Easement/Land Use” is a supplemental message added for all stakeholder audiences and all operator types.
7. For all operator types, “Damage Prevention Importance” and “Damage Prevention Steps” were added as baseline messages for public officials (already baseline for excavators and affected public) and supplemental messages for emergency officials.
8. “Threats or Suspected Damage” to a pipeline is now a baseline message for all stakeholder audiences and all operator types.
9. “Priority to Protect Life” is now a baseline message for all stakeholder audiences and all operator types (previously only baseline for emergency officials and public officials).

10. Emergency drills and exercises is a baseline message for emergency officials and a supplemental message for public officials for all operators.
11. “Leak Recognition and Response” has been added as a baseline message for all stakeholder audiences and all operator types (previously it was only baseline for affected public and excavators).
12. “Special Emergency Response” topic has been added as a baseline message for affected public, emergency officials and public officials for all operator types that transport commodities that, when released, can be immediately dangerous to life and health (IDLH).

Delivery Frequencies and Methods

In considering potential changes to delivery frequencies and methods, the task group reviewed information from expert consultants on risk communication, engagement of public audiences, and leading communication practices, as well as feedback from all operator types and stakeholders receiving information.

Stakeholder	Type of Pipeline	Frequency Language, 3rd Ed.	Frequency Language, 1st Ed.
Affected Public	Transmission Gathering	Every two years, not to exceed 27 months	Two years
Affected Public (Non-Customers)	Distribution	Each calendar year, not to exceed 15 months	Annual
Affected Public (LDC Customers)	Distribution	Twice annually within each calendar year, not to exceed 7.5 months	Twice annually
Emergency Officials	Transmission Gathering Distribution	Each calendar year, not exceed 15 months	Annual
Public Officials	Transmission Gathering Distribution	Every two years, not to exceed 27 months	Two years
Excavators	Transmission Gathering Distribution	Each calendar year, not exceed 15 months	Annual

There are two key changes to delivery frequencies in Section 6.1:

1. The baseline contact frequency for Public Officials has been increased to two years from three years in the 1st and 2nd Editions of API RP 1162. This change more closely reflects the frequency of location election cycles; and
2. The frequency language has changed to make sure that programs are conducted within the intended timeframes.

In Section 6.2, information on delivery methods has been reorganized and guidance on the use of digital platforms, emerging technologies and collaborative programs have been added along with clarification on liaison with emergency officials. The task group has intentionally provided operators with the flexibility to determine which delivery methods will best satisfy the baseline communication needs of a particular stakeholder audience. However, the operator must identify and document baseline communication methods in their written program.

Program Implementation and Supplements

Program Implementation

Program Implementation, defined as the actions that an operator takes to execute their written public awareness program, was included in both the 1st and 2nd Editions, although it was not a stand-alone section in the 1st Edition. The Task Group reviewed the implementation activities noted in the 2nd Edition and made several changes to remove activities that are more appropriately included in Program Establishment. Identified implementation activities include:

- conducting baseline program activities as identified in the operator’s written public awareness program;
- identifying, planning, and conducting supplemental activities, if warranted;
- identifying necessary resources for program activities (e.g., internal & external resources, or consultants);
- documenting program activities.

Program Supplements

The Task Group reviewed the list of examples an operator may consider when evaluating the need to implement supplements to their baseline program. As a result, “Potential Hazards,” and “Pipeline History in an Area” have been removed.

As proposed in Section 7.2.1, operators are required to communicate certain operational changes that require affected public and emergency officials to recognize and respond differently based on new pipeline release hazards that have not previously been communicated. Communication should occur prior to the change but not later than 180 days after the change occurs. These operational changes are any of the below:

- initial operation of a newly commissioned pipeline which is greater than 10 miles in length, and introduces a new release hazard (e.g., installing a second pipeline within the ROW transporting a different commodity type which introduces new hazards that have not previously been communicated);
- initial operation of a distribution pipeline outside existing geographic coverage area;
- conversion to service (e.g., liquids to gas, gas to liquids);
- change in operator’s emergency contact information (e.g., change to 24-hour emergency number).

Examples of operational changes when a communication is not expected:

- Batching (e.g., recognition/response generally the same across products)
- Newly commissioned pipelines within an existing geographic coverage area which do not introduce a new hazard
- Newly commissioned pipelines which are less than 10 miles in length; and
- Normal operational changes (e.g., operating pressure, bi-directional flow)
- New distribution pipelines within an existing service area

Public Awareness Program Evaluation

In response to feedback from the SWOT analysis, pipeline operators and state and federal regulators, the Program Evaluation section was rewritten in the 3rd Edition to provide more detailed guidance, examples and templates for required evaluation activities. The 3rd Edition also provides standardized core survey questions (Annex G of the RP) that operators should use to collect data for each stakeholder audience. The core survey questions included in Annex G were based on leading measurement practices and developed to encourage standardization across the pipeline industry. Additional supplemental questions that an operator may use are found in Annex H of the RP.

Similar to the 1st and 2nd Edition, the 3rd Edition requires operators to conduct an **annual implementation review**. The updated language excludes regulatory audits as an allowable method for conducting the annual review and requires operators to develop a process to evaluate the accuracy of stakeholder contact lists. Annex C includes sample forms and checklists that operators can use to confirm program implementation and to determine if changes may be needed to implementation strategies, methods or processes. Annex I includes examples of list validation activities.

The 3rd Edition continues to require operators to conduct a **program effectiveness evaluation** at least once every four years. Language added to the 3rd Edition clarifies that operators are required to document the program evaluation, requires operators to make a determination regarding program effectiveness and shifts the focus from continuous program improvement to identification of program changes that may be needed based on the evaluation. The 3rd Edition also adds a requirement for operators to develop a process or method to evaluate the accuracy

and completeness of stakeholder contact lists created during the stakeholder identification process. Evaluation of contact list accuracy may be performed by the operator or a third-party. The term “effectiveness measure” used in the 1st Edition changed to “effectiveness evaluation metrics” in the 3rd Edition. The historical effectiveness measures were reviewed; one was removed, and a new metric was added. Changes are outlined below.

1 st Edition “Measure”	3 rd Edition “Metric”
“Measure 1 – Outreach: Percentage of each Intended Audience Reached with Desired Messages”	Renamed as “reach” but not conceptually different. Specific examples are provided for how an operator may choose to assess reach that align with supplemental measures in 1st Edition.
“Measure 2 – Understandability of the Content of the Message”	Renamed in the 3 rd Edition as “message understanding.” Requires operators to use the baseline survey questions included in Annex G to assess understanding of message topics. Supplemental survey questions are provided in Annex H.
“Measure 3 – Desired Behaviors by the Intended. Stakeholder Audience”	Replaced with “behavioral intent.” Requires operators to use the baseline survey questions included in Annex G to track intended behaviors for each stakeholder audience over time.
“Measure 4 – Bottom Line Results”	Renamed in the 3 rd Edition as “Achieving Program Prevention and Response Objectives.” Requires operators to determine if the program is achieving program objectives as defined in their public awareness program.
NA	Added “Recall.” Requires operators to use the baseline survey questions included in Annex G to assess information recall for each stakeholder audience.

In addition to updated metrics, the **program effectiveness evaluation section** requires operators to use baseline survey questions provided in Annex G, based on recommendations from measurement experts regarding the benefits of standardization and benchmarking. Additional supplemental survey questions are provided in Annex H for consideration. Survey data collection guidance is included in a new table (Table 10) and is based on stakeholder population size and historical industry survey data regarding participation rates and other factors.

Documentation

Each operator should collect and retain documentation of their public awareness program to demonstrate that their program aligns with this RP.

The public awareness program documentation should include the written program elements listed in Section 4.2:

- defined program objectives;
- defined program administration;
- identified pipeline assets;
- identified baseline and supplemental methods of communication to be used in the program;
- identification of the frequency of communication with each of the stakeholder audiences;
- a process for identifying program supplements beyond the baseline program;
- a program evaluation method, including the evaluation objectives, an analysis of the results, and criteria for program improvement based on the evaluation.

Additionally, documentation records that an operator should retain include:

- baseline communication materials provided to each stakeholder audience;
- lists, records, or other documentation of stakeholder audiences with whom the operator has communicated;
- implementation dates;
- postage receipts;
- program effectiveness evaluations and annual implementation reviews;
- stakeholder audience language analysis;
- supplements to the baseline program.

The requirement for a statement of management commitment has been removed from the 3rd Edition.

The record retention period has changed to a minimum of seven years, or as defined in the operator's public awareness program, whichever is longer. In the 1st Edition this was a minimum of five years, or as defined in the operator's public awareness program.

Annex

The Annex of the 3rd Edition is comprised of one normative resource (Annex G: Core Effectiveness Evaluation Questions) and a series of informative resources (Annexes B, C, D, E, H and I) for use in the establishment, implementation and evaluation of operators' public awareness programs

Following is a list of the Annexes in the 3rd Edition:

- Annex A: Intentionally left blank
- Annex B: Resources (Trade Associations, Government Agencies, Private Organizations and Other Resources)
- Annex C: Examples: Annual Implementation Review Forms
- Annex D: Additional Information on Surveying
- Annex E: Sample Public Awareness Program Checklist
- Annex F: Large Diameter Rural Gas Gathering Lines
- Annex G: Core Effectiveness Evaluation Questions
- Annex H: Supplemental Questions
- Annex I: Examples of List Validation Activities

V. Summary Table of Changes

Topic	1 st Edition	3 rd Edition	Location
“Can”, “May”, “Should”	<ul style="list-style-type: none"> • The word “can” is used to express possibility or capability; in the RP, “can” is used in lists of examples where the operator has the flexibility to either use one, some, none or go beyond the examples provided. • The use of the word "may" is used to express permission or a provision that is optional. • The use of the word "' should" denotes a recommendation or that which is advised but not required in order to conform to the standard. 	The 3 rd Edition incorporates the terms “can”, “may” and “should” according to API Standards definitions, also provided in this Change Document. There are no “shall” requirements in the 3 rd Edition.	Throughout
Rural gas gathering lines	Included “Gathering Systems” in the scope	The scope clarifies specific requirements for non-regulated Class I and II rural gas gathering lines in the U.S.	Scope
Terms & Definitions	N/A	A number of defined terms and definitions were added while others removed based on relevance.	Section 3.1
Acronyms & Abbreviations	N/A	Added a number of acronyms related to affected stakeholder audiences and removed several previous acronyms.	Section 3.2
Program supplements	Provided a baseline frequency and options for messaging.	Also provides baseline frequencies and messages but refers to additional messaging and frequencies as program supplements rather than program enhancements.	Section 4.2
Plan-Do-Check-Act cycle	N/A	Uses the Plan-Do-Check-Act (PDCA) cycle referenced in API RP 1173, <i>Pipeline Safety Management Systems</i> , to introduce an iterative four-step	Throughout

		approach used to manage processes and programs. It also identifies certain sections of the RP by PDCA phases.	
Program Establishment	Operators were required to obtain management support or commitment for their public awareness program.	The requirement for obtaining management commitment was removed.	Section 4
Affected public coverage areas	It was recommended that transmission pipeline operators provide communications within a minimum coverage area distance of 660 feet on each side of the pipeline, or as much as 1000 feet in some cases for the sub-groups “Residents located along transmission pipeline ROW” and “Places of Congregation.”	Outlines a table of minimum and maximum coverage areas for affected public based on product within the pipe.	Section 4.6.1
Additional languages	Required operators to identify a process to determine languages other than English that are commonly understood by a significant number and concentration of the population in their operational area.	Requires operators to include in their process a definition of “significant number and concentration,” as appropriate for their operating area, and providing data source(s) used in identifying appropriate languages for the affected public stakeholder audience.	Section 4.7
Messages	Provided a suite of messaging options operators could choose from, which complicated trending and effectiveness analyses.	Worked with messaging experts to review messages, which stakeholder audience they apply to, if they are baseline or supplemental and which operator types need to deliver which messages.	Section 5
Delivery frequencies & methods	Included baseline contact frequency for Public Officials at every three years and provided set timelines for conducting messages.	Changes the baseline frequency for Public Officials to every two years to more closely align with local election cycles and changed frequency language for a number of audience groups to	Section 6.1

		make sure that programs are conducted within the intended timeframes.	
Digital platforms	No reference to digital platforms and emerging technologies cited as acceptable delivery methods.	Increased flexibility for operators to choose the delivery method that best satisfies its program objectives. Digital platforms and collaborative programs have been added as delivery methods and guidance on liaison with emergency officials has been strengthened. Flexibility for emerging technologies has also been added.	Section 6.2
Operational changes	N/A	Certain operational changes initiated by the operator require affected stakeholders (AP, EO) to recognize and respond differently based on new pipeline hazards. Communication of the change to affected public and emergency officials should occur prior to the change but no later than 180 after the change occurs.	Section 7.2.1
Program evaluation		Excludes regulatory audits as an allowable method for conducting the annual review. It also continues the requirement for a program effectiveness evaluation, but updated language requirements for operators to document the evaluation and program effectiveness and any changes or shifts that are made. Adds a requirement to develop a process to evaluate the accuracy and completeness of stakeholder contact lists created	Section 8

		<p>during the stakeholder identification process.</p> <p>Refers to “effectiveness evaluation metrics” and modifies the previous four metrics and adds a metric for recall.</p>	
Documentation	Minimum record retention period of five years, or as defined in the operator’s public awareness program.	Changed the requirement to a minimum of seven years, or as defined in an operator’s program, whichever is longer.	Section 9