

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

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Order Instituting Investigation to Address Intrastate  
Rural Call Completion Issues.

Investigation 14-05-012  
(Filed May 15, 2014)

**REPORT OF PACIFIC BELL TELEPHONE COMPANY DBA AT&T CALIFORNIA  
(U 1001 C) IN RESPONSE TO ASSIGNED COMMISSIONER'S RULING INVITING  
PARTY AND PUBLIC COMMENTS REGARDING ISSUES RAISED AT PUBLIC  
PARTICIPATION HEARINGS AND WORKSHOPS, FILED SEPTEMBER 8, 2016**

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Pacific Bell Telephone Company d/b/a AT&T California (“AT&T”) hereby provides the following report in response to the Assigned Commissioner’s Ruling of September 8, 2016.

In the Assigned Commissioner’s Ruling, AT&T was ordered to meet with other specified carriers and investigate claims of 211 call failures in the Eureka area.<sup>1</sup> These claims were made at the Eureka PPH on July 18, 2016, as further explained below.

In response to this Ruling, AT&T has met by teleconference with each of the other carriers to discuss and investigate these claims. In addition, AT&T has conducted an independent investigation.

**1. BACKGROUND – DESCRIPTION OF 211**

211 is an abbreviated dialing code designated by the FCC to provide Community Information and Referral Services in the *Third Report and Order and Order on Reconsideration* adopted July 21, 2000 and released July 31, 2000 in CC Docket No. 92-105.<sup>2</sup> For Communications Service Providers, existing rules require them to offer to route calls received on their network either via a local routing number or a toll-free number to a designated 211 Agency. *See Re Rulemaking to Implement 2-1-1 Dialing in California*, Decision No. 03-02-029, *Decision Establishing Procedures for Implementing 2-1-1 Dialing in California*, 2003 WL 548690

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<sup>1</sup> “I direct respondent carriers serving Humboldt County, particularly AT&T, Suddenlink, Comcast, and Frontier, to meet to investigate this issue and take steps to resolve any false disconnected or not in service messages. The carriers should meet with 211 Eureka and the Hoopa tribe, the Eureka Chamber of Commerce, and other organizations who spoke at the Eureka PPH to identify organizations and businesses that report their phone giving a false disconnected or not in service message. The respondent carriers shall be prepared to discuss the issue at the September 20, 2016 Call Completion Workshop in Felton, California, and shall file and serve their report with the Commission by September 23, 2016.” *Id.* at 11-12 (OP 1).

<sup>2</sup> *In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, etc.*, CC Dkt. No. 92-105, etc., *Third Report and Order and Order on Reconsideration*, 15 FCC Rcd. 16753, 21 Communications Reg. (P&F) 726, FCC 00-256 (rel. July 31, 2000).

(Cal.P.U.C. Feb. 13, 2003). The smallest geographic service area which can be designated is a county.

There can only be one 211 Agency per county. Of the 58 Counties in California, 21 Counties do not currently have 211 Service.

211 Service Agencies are responsible for serving a request to offer 211 Service in a County with the CPUC for approval and to simultaneously serve Communications Service Providers in the area with their application. 211 Service Agencies are also responsible for obtaining agreements from Communications Service Providers in the designated service area to transport calls received from customers to the 211 Agency. The 211 Service Agencies provide the Community Information Services in their CPUC approved territory.

If a 211 Service Agency has not requested a county or the 211 Service Agency fails to work with a particular Communications Service Provider in the designated area to transport calls received from that Communications Service Providers customers, a person using that Communications Service Provider to place a call to 211 will reach a recording that the number is not in service.

## **2. AT&T'S INVESTIGATION INTO CLAIMS OF 211 CALL FAILURES**

Based on the foregoing, the following questions are critical to investigating a claim of 211 call failure:

- What number were the calls being placed from?
- What county were the calls made from, and is there a 211 Agency for that County?
- Which Service Provider handles call transport for local and long distance calls from the identified number?
- What did the caller reach after dialing 211: agent, busy, or a type of recording?

Jeannette Hurst is the Director of “211 Humboldt.” 211 Humboldt partners with the United Way of the Wine Country, which is the approved 211 Agency for Humboldt County. Ms. Hurst appeared at the Eureka PPH on July 18. She testified that Karen Kyle, the Director of the TANF office (Temporary Assistance for Needy Families) at the Hoopa tribal reservation, as well as the Fortuna River Lodge, received “can’t be reached signals” when they tried to call 211.<sup>3</sup>

### **Hoopa Valley TANF**

AT&T found several phone numbers on the Hoopa Valley TANF website which indicated it is located in Hoopa, CA in Humboldt County. Frontier is the service provider on all of the numbers listed on the Hoopa Valley TANF website.

### **Fortuna River Lodge**

AT&T is the Service Provider for the Fortuna River Lodge and Conference Center. However, AT&T’s records indicate that the location uses PBX system and that the City of Fortuna has a block on their entire account preventing calls to 611, 411, 211 etc. With such a block in place, a 211 call placed from Fortuna River Lodge would reach a recording that “the call cannot be completed.” If the block was not in place, callers would be required to dial “9” first to reach an outside line before dialing 211; failure to do so would cause the caller to reach the same recording.

### **Eureka Chamber of Commerce/211 Humboldt**

An AT&T representative spoke with Don Smullen, CEO of the Greater Eureka Chamber of Commerce, and asked him to share his direct experience with 211 service or share any anecdotal experiences that were conveyed to him in his role as CEO at the chamber. Mr. Smullen stated that he has not heard from anyone/agency with a client who has had a problem

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<sup>3</sup> See Workshop/PPH Tr. Vol. 6, pp. 698-699 (July 18, 2016).

getting through to 211 Humboldt. Mr. Smullen only stated that, in his discussions with Ms. Hurst, she stated that she called 211 directly from Fortuna (Humboldt County) and Hyampom (Trinity County). He said that her experience was that she reached a recording, however, he was not clear as to what was stated on the recording.

The AT&T representative eventually spoke directly with Ms. Hurst, who stated that approximately one year ago she called 211 from the Fortuna River Lodge & Conference Center in Fortuna (707-725-7572) and reached a recording that either stated, “this number is no longer in service” or she received a busy signal. She said she couldn’t remember exactly what she reached. Ms. Hurst also claimed that she called from the Hoopa Valley TANF office (530-625-4816 ext. 106) and received a busy signal. Ms. Hurst referenced the Director of the Hoopa Valley TANF agency, Karen Kyle, as having called on two separate occasions from the same number and reaching a similar recording.

Finally, Ms. Hurst forwarded the following table as instances of 211 Call failures:

<b>Name</b>	<b>Phone Number</b>	<b>Location</b>	<b>Carrier</b>
Brenda	707-986-7131	SO Hum (Wale Gulch High School Whithorn CA)	Verizon
Barnubus (case manager)	707-822-2481	North Country Clinic	
Sandra Rowan	Cell: 616-8333 (Verizon) House: (Suddenlink) 3/24 Said when she dialed from her House the 2-1-1 said call could not be completed. Just called the toll free from her cell.		
Tom	House (Suddenlink) 707-798-1075 Cell (US Cellular) 707-498-8221 dialed from his house the 2-1-1 said call could not be completed as dialed. Went through on his Cell. Tried	Eureka	House (Suddenlink) 707-798-1075 Cell (US Cellular) 707-498-8221

Name	Phone Number	Location	Carrier
	house again and it went through.		
River lodge	(707) 725-75728	1800 Riverwalk Dr., Fortuna, CA 95540	
Hoopa TANF Karen Kyle	530-625-4816x106	82 Willow Street Hoopa, CA 95546	
Ross Jantz HCAR	707-362-8021	1707 E St., #2 Eureka, CA 95501	

AT&T's investigation of the foregoing claims are as follows:

- a) Calls from Hyampom: Hyampom is in Trinity County which is one of the 21 unserved counties in CA and does not have 211 Service available. Thus, Ms. Hurst would not be able to complete a 211 call from Hyampom.
- b) Wale Gulch High School in Whithorn, CA (707-986-7131) is in Humboldt County and the customer reported service is provided by Frontier California.
- c) North Country Clinic in Arcata, CA (707-822-2481) is in Humboldt County and service is provided by Suddenlink.
- d) Sandra Rowan reports that her residential service (707-616-8333) is provided by Suddenlink and cell service provided by Verizon Wireless.
- e) "Tom" reports that his residential service (707-798-1075) is provided by Suddenlink and cell service (707-498-8221) is provided by US Cellular.
- f) "River lodge": See "Fortuna River Lodge" discussion *supra*, p. 3.
- g) "Hoopa TANF Karen Kyle": See "Hoopa Valley TANF" discussion *supra*, p. 3.
- h) HCAR's service (707-362-8021) is provided by Onvoy, LLC CA.

3. **CONCLUSION**

AT&T's investigation shows that in no instance has AT&T failed to complete a 211 call.

Dated: September 23, 2016

Respectfully submitted,

By: \_\_\_\_\_ /s/ \_\_\_\_\_

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