

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



FILED

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Petition to Adopt, Amend, or Repeal a Regulation Pursuant to Pub. Util. Code § 1708.5 to Designate Lead Entity and to Enable Emergency Access to 211 Services in Counties and Localities Without Existing 211 Centers.

Petition 10-02-002
(Filed February 4, 2010)

**RESPONSE OF VERIZON CALIFORNIA INC. (U 1002 C) AND VERIZON WEST
COAST INC. (U 1024 C) ON PETITION OF 211 CALIFORNIA**

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March 8, 2010

Verizon California Inc. and Verizon West Coast Inc. (collectively, Verizon) respectfully submit this response on the Petition of 2-1-1 California to Designate Lead Entity and to Enable Emergency Access to 211 Services in Counties and Localities Without Existing 211 Centers (Petition). Verizon appreciates the opportunity to work with 2-1-1 California and the Commission to develop any rules needed to enhance and expand the availability of the valuable community services provided today by 211 service and looks forward to the further discussion and exchange of information needed to do so.¹

A. Further Information is Required For Meaningful Comments

As the Administrative Law Judge's Ruling dated February 23 noted, effective consideration of 2-1-1 California's Petition requires additional information.² Verizon agrees. Indeed, the additional areas of detail sought by the Ruling - in particular, the specific proposed changes to the rules and guidelines set forth in D.03-02-029 - will enable Verizon to better develop its position on the Petition. Accordingly, Verizon will supplement this response after it has had an opportunity to review 2-1-1 California's Response to Inquiries of the ALJ, by addressing the Response either in reply comments or at such other time and manner as the ALJ may designate.³

B. The Petition Raises Other Questions Which Must Be Addressed

¹ Representatives of Petitioner recently discussed some of the issues identified in these comments with Verizon and provided further helpful clarification, which Verizon hopes to be able to address in further comments, technical workshops, or as directed by the ALJ as this proceeding progresses.

² See Administrative Law Judge's Ruling Requiring Petitioner to File a Response to Request for Information Within 10 Days, dated February 23, 2010.

³ 2-1-1 California's response is due and was filed March 5, 2010, one business day before this response was due, a period that did not permit adequate internal review and comment.

In addition to the explicit subject areas raised in the Ruling, Verizon has identified the following questions and areas of concern with respect to the Petition.

First, the Petition appears to suggest a change in the current structure of the 211 program, and this must be clarified in order to fully address the issues in the Petition. At present, as Verizon understands it, 211 is a program in which all Californians have access to “live” 211 services 24/7/365.⁴ The Petition appears to propose something different: (1) in the absence of a “local disaster or emergency” (a term or set of conditions that is not defined), callers would receive a recorded message instructing them how to access information and the “opportunity to speak with a live person who could direct them” appropriately; and (2) in the event of a local disaster, calls would be redirected to the existing network of 211 providers.⁵ The impact of this apparent change on public perceptions of and access to 211, the relationship between 211 and 911 services, and the resulting impact on carrier call routing protocols and costs should be clarified and considered as part of the Petition and any future rulemaking.

Second, and related to the above, is the level of access expected. At present, 911 is the only emergency service that offers redundant routing to ensure that more calls can be completed during periods of high volume. As discussed above, the Petition expressly contemplates that, during an emergency, customers in currently unserved counties will have access to live operators in other counties. This proposal is a significant change, and could create expectations for a level of service that may well not be reliably achieved with current 211 protocols. Petitioner should address its plans in this regard in further detail.

⁴ Petition, Appendix A, p. 7.

⁵ Petition at 7.

Third, this dual approach raises a question as to the role of the service provider and the 211 provider. Based on the current configuration of 211 service, Verizon provides routing to the designated 211 center, and how calls are handled from there (whether a live person or a recording) is the role of the 211 provider. Any changes to this protocol must be clarified.

Fourth, the Petition includes cellular carriers in the scope of its proposed rules,⁶ without acknowledging that the Commission in D.03-02-029 did “not address the situation of wireless carriers.”⁷ This proposal is a significant change, and the need, jurisdictional basis, and ramifications of including wireless carriers in the scope of any future 211 rules must be addressed.⁸

Fifth, the Petition asserts that “all of the State’s existing 211 providers have agreed that 2-1-1 California should act ... as the lead entity in coordinating” 211 service, among other roles.⁹ In support of this, the Petition attaches a Memorandum of Agreement between 2-1-1 LA County and 2-1-1 California Partnership, a California general partnership of United Ways and the California Alliance of Information and Referral Services, which appears to include most of the 211 providers in the state. While the Ruling does seek the legal basis upon which 2-1-1 California seeks this designation as lead entity,¹⁰ the applicant should further explain the extent of these agreements and how they relate to the relief sought in the Petition. In addition, it is not entirely clear how the designation as lead agency is related to the goal of providing service in currently unserved areas, or to the differential handling of calls depending upon whether a disaster exists. 2-1-1

⁶ Petition at 6.

⁷ D.03-02-029 at 2.

⁸ Verizon Wireless will be filing separately to address this issue in more detail.

⁹ Petition at 8.

¹⁰ Ruling at 3.

California should more fully explain the purpose and ramifications of the role of lead agency as contemplated by the Petition, and why it is necessary and appropriate.

C. The Petition Should Address AB 2737

Finally, the Petition should discuss pending legislation which deals with much the same subject matter as the Petition. AB 2737, introduced by Assembly Member Block on February 19, 2010, authorizes the Commission to designate a lead agency for implementation of a 211 dialing system in California in accordance with federal law.¹¹ Given the close overlap between the two, Petitioner should discuss the relationship of the legislation to its Petition.

Dated: March 8, 2010

Respectfully submitted,



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¹¹ The text of this bill can be found at http://info.sen.ca.gov/pub/09-10/bill/asm/ab_2701-2750/ab_2737_bill_20100219_introduced.pdf

CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 711 Van Ness Avenue, Suite 300, San Francisco, California 94102; I have this day served a copy of the foregoing, **RESPONSE COMMENTS OF VERIZON CALIFORNIA INC. (U 1002 C) AND VERIZON WEST COAST INC. (U 1024 C) ON PETITION OF 211 CALIFORNIA** by electronic mail to those who have provided an e-mail address and by U.S. Mail to those who have not, on the service list.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of March, 2010 at San Francisco, California.

/s/ Christine Becerra
CHRISTINE BECERRA

P.10-02-002
R.08-01-025



California Public
Utilities Commission

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