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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Program Management & Implementation
Branch**

**RESOLUTION T-17109
November 1, 2007**

RESOLUTION

Resolution T-17109. United Way of Fresno County. Request for certification as the 2-1-1 service provider for Fresno County. By Letter to Executive Director filed on August 1, 2007.

Summary

This resolution grants United Way of Fresno County hereinafter referred to as UWFC, the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Fresno County. This authority is granted for an indefinite term, and is subject to review upon a letter to the Commission showing sufficient grounds to revise or rescind the term.

Background

2-1-1 is the national abbreviated dialing code designated by the Federal Communications Commission to be used to phone non-emergency community I&R providers. Upon dialing 2-1-1, a caller will be routed to a referral service and then to an agency that can provide information concerning social services such as housing assistance, programs to assist with utility bills, food assistance and other less urgent situations not currently addressed by either 911 or 311 services. On January 23, 2002, the California Public Utilities Commission (Commission) instituted Rulemaking (R.) 02-01-025 into the implementation of 2-1-1 dialing in the State of California. In Decision (D.) 03-02-029, the Commission adopted regulatory policies and procedures to implement 2-1-1 dialing.

Included among these policies were guidelines and procedures whereby the Commission can certify I&R providers as eligible to purchase network telephone service that will enable them to receive calls from those who dial 2-1-1. Most of the procedures

for I&R providers to follow in requesting authority to use the 2-1-1 dialing code are contained in D.03-02-029's Ordering Paragraph 2, quoted below:

2. Information and Referral (I&R) providers seeking authority to provide 2-1-1 service or to establish Regional Technical Centers for routing 2-1-1 calls to I&R service providers in California shall submit a letter to the Executive Director of the Commission approximately nine months before they plan to commence service. The letter shall contain the information detailed in the Service Provider Application Package in Appendix A, shall include a service rollout plan, and shall demonstrate compliance with the guidelines contained in Appendix A to this decision, along with letters of endorsement from community groups as described in Appendix A. The I&R providers shall serve this application letter on the parties to this proceeding on the same day as its submission to the Commission. The Commission shall publish a notice of this letter in its Daily Calendar. We establish a milestone of six months from the initial filing of this application letter for action by the Commission via a resolution resolving any issues. This application letter should be served on the appropriate incumbent local exchange carriers and on all parties to this proceeding.

By Letter to the Commission's Executive Director received on August 1, 2007, UWFC of Fresno County filed a complete copy of its application letter¹ requesting certification as the 2-1-1 service provider in Fresno County, as well as a copy with information UWFC considered confidential redacted. On the same date, UWFC sent to SBC Communications now AT&T and Verizon Communications as well as the service list for R.02-01-025 redacted copies of its application letter.

We remind local exchange carriers of D. 03-02-029, Ordering Paragraph 3, which states "Within four months of the filing of a letter by I&R providers or a regional technical center seeking to initiate 2-1-1 service, the incumbent local exchange carriers serving the territory over which the 2-1-1 service will be offered shall file advice letters to provide the 2-1-1 switch translation services required. Ordering Paragraph 4 states "All other incumbent local carriers serving a territory over which the 2-1-1 service will be offered shall provide the needed switch translation service, but may either concur in the price terms offered by Pacific or Verizon or submit their own cost support information. This filing shall follow that of Pacific or Verizon by no more than 30 days." Competitive local carriers must comply with Ordering Paragraph 7, which states in part, "Within one month of the filing of an advice letter by incumbent local exchange carriers to offer

¹ The terms "application letter" and "application" used herein mean the package of materials the prospective I&R provider files with the Commission by letter to the Executive Director, as specified in D.03-02-029, and are not a formal application to the Commission as described in the Commission's Rules of Practice and Procedure.

2-1-1 switch translation services in a specific area, each competitive local carrier providing services in the affected areas shall submit an advice letter, under General Order 96-A, demonstrating that it will offer 2-1-1 switch translation service at a reasonable rate to I&R providers on a timetable consistent with their rollout plans.”

We remind payphone service providers of the same decision’s Ordering Paragraph 6, stating in part “The providers of payphone services in an area in which 2-1-1 service will be offered shall end all non-conforming uses of 2-1-1 service within six months of their filing.” i.e., within six months of the filing of the application letter by the I&R provider.

Notice/Protests

UWFC states that it mailed a copy of its application letter to SBC Communications now AT&T and Verizon Communications as well as to the service list for R.02-01-025, which includes the appropriate incumbent local exchange carriers. The Communications Division published notice of UWFC’s application letter in the Commission Daily Calendar on August 7, 2007 through August 17, 2007. In response to UWFC’s application letter, the California Alliance of Information and Referral Services, Inc. (CAIRS) submitted written comments supporting the request of UWFC to use the 2-1-1 dialing code in Fresno County. No other comments were submitted.

Discussion

The 2-1-1 application process prescribed by D.03-02-029 for potential I&R providers is divided into four major sections. The first section elicits information on the I&R provider’s organization, its structure, its background, and experience.

UWFC is a non profit organization incorporated in the State of California. The documents included to support this categorization are its articles of incorporation, including By-laws, and letters from the Internal Revenue Service. Its location is 4949 E Kings Canyon Road, Fresno, CA 93727. The contact person is Dr. Richard Kriegbaum, President, at (559) 243-3660 and email at rkriegbaum@unitedwayfresno.org.

UWFC’s application states that it has been providing comprehensive information and referral services to Fresno County since 1999 to 2004 with low call volume, using databases maintained by other agencies. With the relocation to its new facility early in 2004 the I&R function was enhanced with improved phone and information technology systems and more professional staffing. Call volume increased to average a few calls a day. Expanded outreach efforts have increased call volume significantly.

UWFC application indicates that staff and key managers have many years of experience either directly in comprehensive I&R service, or in similar human services planning and information management. All staff has participated in onsite and online training utilizing AIRS conferences.

UWFC provided a 3-year budget. UWFC's budget and financial statements indicate a stable and solvent financial position. It appears that UWFC has appropriate budgetary planning procedures to support 2-1-1 service at current call volumes.

The second section of the prescribed application sets forth the required service conditions that a 2-1-1 service provider must meet. Section 2 of UWFC application indicates that it does not and will not receive fees from referred organizations for referrals and no fees or charges levied to providers listed in its database. Furthermore, UWFC's information and referrals services have been provided free of charge to callers since the inception and will remain that way upon implementation of 2-1-1. UWFC currently provides services 5 days a week from 8am to 5pm. UWFC has a service agreement with the Inland empire United Way 2-1-1 San Bernardino to provide the after hours and weekend service.

UWFC staff currently provides I&R services in English, Spanish, Lao, Thai, and Khmer. UWFC provides interpretation services through Tele-Interpreters, a professional over-the-phone interpretation service. Tele-Interpreters provide culturally appropriate interpretation in 150 languages and dialects and have experience in the field of I&R. They have partnered with the Alliance of Information and Referral Systems (AIRS) and many 211 providers nationally use their service, such as 2-1-1 San Bernardino, 2-1-1 of Los Angeles and Eden I&R in Alameda County. UWFC provides service to the hearing impaired community through the California Relay Service.

In the third section of the prescribed application, the applicant must demonstrate its understanding of and agreement to adhere to the standards for delivery of I&R services established by the Alliance of Information and Referral Services (AIRS). UWFC's Information and Referral program has internal protocols to ensure calls are handled consistent with guidelines developed by AIRS. AIRS' guidelines are the basis for the service delivery standards associated with use of the 2-1-1 dialing code as specified by the CPUC Decision 03-02-029. UWFC's application includes descriptions of its policies in the areas of call assessment and follow-up, confidentiality, database standards, disaster readiness, reports and measures, cooperative relationships, training, marketing, and program evaluation. These policies appear to be more than adequate to meet the standards established by AIRS.

In the fourth section of the prescribed application, the applicant demonstrates its level of community support by including letters of endorsement from organizations and

agencies that are stakeholders in the health and human services network in its community. UWFC included in its application letters of endorsement from 15 different organizations and agencies in a broad range of health and human service fields throughout Fresno County. These endorsements demonstrate broad community support.

In processing this 2-1-1 application, Communications Division considered the input of the Fresno County government because it oversees the operations of county hospitals, a county welfare department, and numerous other agencies and programs in the fields of health and human services, and is best equipped to evaluate whether an I&R provider is well suited to provide comprehensive I&R service in Fresno County. California's size and diversity, in geography, politics, and many other categories, argue against a statewide "one size fits-all" approach to evaluating and choosing comprehensive I&R providers. County governments can best apply local standards and local knowledge to this difficult but important task. Bob Waterston, Chairman on behalf of Fresno County Board of Supervisors sent a letter on October 2, 2007 endorsing UWFC's application to serve as the 2-1-1 provider of Fresno County residents and employees. The Commission values the input of the Fresno County Board of Supervisors on this matter, and takes official notice of its action.

D.03-02-029 did not specifically address the length of time for which the Commission's grant of authority to use the 2-1-1 dialing code should be made. Utilities and other frequent participants in Commission proceedings generally know that most Commission decisions, resolutions, and actions can be later modified or rescinded if a showing of sufficient grounds to do so is made in a filing before the Commission. However, most I&R providers and county governments are not frequent participants in Commission proceedings, and may benefit from some clarification of this point. The grant of authority to use the 2-1-1 dialing code in a county or group of counties is for an indefinite term and may be revised or rescinded if a showing of sufficient grounds to do so is made to the Commission. For the reasons cited in the previous paragraph, the Commission should consider a resolution by the Fresno County Board of Supervisors as a crucial part of any showing that the authority to use the 2-1-1 dialing code for comprehensive I&R service for Fresno County should be rescinded, reassigned, or modified. A letter to the Commission's Executive Director could serve to initiate such a process. Any such process should provide notice to all affected parties and an opportunity to be heard.

The Communications Division concludes that the application letter filed by UWFC of Fresno County meets the requirements set forth in the Commission's order and recommends that the Commission approve this filing. Commission approval is based on the specifics of the application letter, and does not establish a precedent for the contents of future filings or for Commission approval of similar requests.

This is an uncontested matter in which the resolution grants the relief requested. Accordingly, pursuant to P.U.Code Section 311 (g) (2) and Rule 14.6(c) (2) of the Commission's Rules of Practice and Procedure, the otherwise applicable 30-day period for public review and comment is being waived.

Findings

1. United Way of Fresno County, hereinafter referred to as UWFC sent its application letter for certification as the 2-1-1 service provider for Fresno County to the Commission on August 1, 2007.
2. CAIRS submitted written comments in support of UWFC's application. No other comments were submitted.
3. UWFC's application provides sufficient information to meet the four major sections of the 2-1-1 application process required by D. 03-02-039.
4. The Chairman of the Fresno County Board of Supervisor sent a letter to the Commission on October 2, 2007, endorsing UWFC to serve as the 2-1-1 provider for Fresno County.
5. CD concludes that UWFC's application meets the requirements established by D. 03-02-029 to use the 2-1-1 dialing code.

THEREFORE, IT IS ORDERED that:

1. United Way of Fresno County (UWFC) is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Fresno County.
2. This authority is granted for an indefinite term, and is subject to review upon showing sufficient grounds to revise or rescind the term. Any process to contest, revise, or rescind this authority shall provide notice to all affected parties and an opportunity to be heard.
3. If UWFC cannot implement 2-1-1 dialing within a year after the Commission's approval of UWFC and the needed tariffs of the telecommunications service providers ordered in Ordering Paragraphs 3, 4, and 7 of D.03-02-029, then, barring further Commission action, the certification of UWFC shall lapse so that another I&R provider may apply to offer service in a service territory containing Fresno County.

4. UWFC shall notify the Director of the Communications Division in writing of the date 2-1-1 service is first rendered to the public, within five days after service begins.

This Resolution is effective today.

I hereby certify that the Public Utilities Commission at its regular meeting on November 1, 2007 adopted this Resolution. The following Commissioners approved it:

PAUL CLANON
Executive Director

MICHAEL R. PEEVEY
President
DIAN M. GRUENEICH
JOHN A. BOHN
RACHELLE B. CHONG
TIMOTHY ALAN SIMON
Commissioners