

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Consumer Programs Branch**

**RESOLUTION T-17441
August 14, 2014**

R E S O L U T I O N

Resolution T-17441. Family Resource and Referral Center of San Joaquin.
Request for certification as the 2-1-1 service provider for San Joaquin
County. By Letter to Executive Director filed on April 2, 2014.

Summary

This resolution grants the Family Resource and Referral Center of San Joaquin County, herein referred to as (FRRC), the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of San Joaquin County. FRRC will provide immediate public safety impact during non-emergencies, emergencies and disasters, such as providing a web-based and call-in information call center addressing public safety 24 hours a day, 7 days a week, and will work closely with the Office of Emergency Management in San Joaquin and 2-1-1 Fresno to provide critical public information related to emergency and disaster incidents. This authority is granted for an indefinite term, and is subject to review upon a letter to the California Public Utilities Commission (CPUC or 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 9-1-1 or 3-1-1 services.

On January 23, 2002, the CPUC 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 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.

The Commission's Executive Director received the application letter ¹filed by FRRRC requesting certification as the 2-1-1 service provider for San Joaquin County on April 4, 2014. FRRRC sent copies of its application letter to the R.02-01-025 service list on April 2, 2014.

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

¹ The terms "application letter", "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.

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 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 ², 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 also 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

FRRC confirmed that it mailed a copy of its application letter on April 2, 2014 to SBC Communications, now AT&T, as well as to the service list for R.02-01-025, which includes the appropriate incumbent local exchange carriers.

CD published a notice of FRRC’s application letter in the Commission Daily Calendar on April 14, 2014 through May 5, 2014. In response to the notice, the California Alliance of Information and Referral Services, Inc. (CAIRS) submitted a letter dated April 28, 2014 supporting the request of FRRC to use the 2-1-1 dialing code to serve in San Joaquin County. In addition, there was a letter dated May 22, 2014 from Jerome Candelaria, the California Cable & Telecommunications Association, expressing support for the 2-1-1 Information and Referral service in San Joaquin County. No other comments were submitted.

Discussion

The first section of the prescribed application demonstrates that FRRC has the organizational structure, background and experience to provide basic 2-1-1 Information and Referral services for the San Joaquin County. FRRC was established as a non-profit organization in 1979, operating under the fiscal sponsorship of the Stockton Metro Ministry (The Ministry), which was incorporated and registered with the California Secretary of State as a public benefit not-for-profit corporation on February 5, 1968. The Ministry received its Federal tax-exempt 501 (c) (3) status in 1969.

The FRRC began providing services to children and families in 1979 and in 2009, FRRC and The Ministry merged changing its name to the Family Resource and Referral Center of San Joaquin.

² General Order 96-A has since been replaced by General Order 96-B.

The FRRC is governed by a Board of Directors (Board) comprised of San Joaquin County residents who work for organizations that serve county residents through the provision of health and human services, private business or as representatives of the community. Members are elected to the Board and may serve up to three (3) year terms.

The Board provides direction and guidance to the organization, ensuring its adherence to the FRRC mission as well as the program priorities. The Board approved the submission of FRRC's 2-1-1 application with FRRC serving as the 2-1-1 Service Provider for San Joaquin County at its Board meeting on March 19, 2014.

Since 1979, FRRC has been providing child and youth development services that promote family well-being, delivering child care and nutrition services. The organization also promotes community awareness regarding the needs of children and families and provides educational resources on parenting skills. FRRC also subsidizes child care, professional development for child care providers, and coordinates community engagement and youth development programs for teens through its Teen Impact Center and operates a food program for children and adults in 10 counties under the auspices of the United States Department of Agriculture.

An integral part of FRRC's service delivery system is the Resource and Referral (R&R) Center, a call-in or walk-in location where people can get help navigating through child care, health and human services. The center is structured and functions the same as a 2-1-1 Information and Referral service center. Trained R&R specialists answer calls for assistance or provide in person support, conducting interviews to assess needs or determine eligibility for services, make referrals to child care providers and community resource agencies. Although FRRC was established primarily to serve children and families, the R&R Center service population has expanded over the years. Reports are showing that 67% of present day callers are asking for information pertaining to housing, health care and immigration. Moreover, an average of 450 calls per month are for non-child care related needs, which further supports FRRC's request as the 2-1-1 Service Provider for San Joaquin County.

Operating the R&R call center requires the use of various kinds of software. FRRC staff use Naccraware, national standard software for child care resources and referrals. It features a graphical interface and web-enabled, searchable database that is used to meet needs following caller specifications or randomized referrals. In addition, FRRC uses NoHo for subsidized child care programs. It has multiple features for caseload management, tracking participation and maintaining eligibility lists.

FRRC R&R Specialists maintain the San Joaquin database of licensed child care providers. In an effort to meet non-child care related requests for information and

assistance, staff use printed or static electronic directories developed by other community agencies for shared referral purposes.

United Way Fresno (UW) established the 2-1-1 Fresno R&R service in 2007. Upon Commission approval of its application, FRRC will contract with UW Fresno to take 2-1-1 San Joaquin's after hour calls. The 2-1-1 Fresno call center operates 24 hours a day, 7 days a week.

2-1-1 Fresno has demonstrated the capacity to take linked calls from other 2-1-1 services. For example, 2-1-1 Fresno started taking 2-1-1 Stanislaus calls 24 hours a day, 7 days a week commencing January 2014.

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 FRRC's 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.

San Joaquin County is the proposed area for the 2-1-1 I&R services. San Joaquin I&R services will be provided free of charge to callers. This service is commercial free. San Joaquin will be staffed by trained I&R Specialists who will answer telephone calls "live" during regular work hours, 8:00 a.m. to 6:00 p.m., Monday through Friday, except holidays.

FRRC is contracting with UW Fresno to serve 2-1-1 San Joaquin callers after hours from 6:00 p.m. to 8:00 a.m. Monday through Friday and 24 hours on the weekends. UW Fresno will provide services out of its 2-1-1 Fresno Call Center during these hours and 24 hours a day during holidays. 2-1-1 San Joaquin and 2-1-1 Fresno use compatible platforms, Five9 telephone system and iCarol database software.

2-1-1 San Joaquin and 2-1-1 Fresno will provide its I&R services to non-English speaking callers through bilingual or multilingual I&R Specialists and support staff. They will also use a telephone interpreting service, Language Line to ensure seamless support for non-English speaking callers.

FRRC I&R Specialists will speak English and one other language such as Spanish, Hmong, Laotian or Khmer. The 2-1-1 Fresno call center has bilingual or multilingual staff fluent in English in addition to Spanish, Mien, Khmer and Hmong.

FRRC 2-1-1 San Joaquin will subscribe to Language Line which provides translation through telephone services via live staff in 150 languages. 2-1-1 Fresno already subscribes to the same service and will use it to support 2-1-1 San Joaquin callers as needed.

FRRC 2-1-1 San Joaquin will maintain a dedicated TDD phone for week day daytime service. 2-1-1 Fresno maintains a TDD phone line which will be used for providing FRRC's after-hours service. I&R Specialists are trained to assist callers with disabilities using the TTY machine and callers using the California Relay service.

FRRC provided a three-year budget for the San Joaquin County service as part of their application. FRCC's budget and financial statements appear in a stable and solvent financial position and have appropriate budgetary planning procedures to support 2-1-1 service at current call volumes.

In the third section of the prescribed application, the applicant must demonstrate its understanding of and must agree to adhere to the standards for delivery of I&R services as established by the Alliance of Information and Referral Services (AIRS). FRRC 2-1-1 San Joaquin and 2-1-1 Fresno have 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. FRRC'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 meet the standards established by AIRS.

FRRC recognizes that accuracy of referral resource information is the most critical element of a 2-1-1 service. 2-1-1 San Joaquin will make it a priority to ensure that a comprehensive database is developed and that it remains accurate, up-to-date and complete. The staffing plan includes one dedicated I&R Data Specialist whose responsibility is to maintain the information in the database of community services which will be used by 2-1-1 San Joaquin and 2-1-1 Fresno for all I&R calls. The database will meet AIRS standards and provide I&R Specialists immediate access to high-quality, accurate and up-to-date information they need to assist callers.

2-1-1 San Joaquin and 2-1-1 Fresno will ensure that they meet the AIRS standards for confidentiality. Both sites have ample space to ensure confidential interviewing. The I&R call center space is lockable and equipped with lockable filing cabinets. The computer terminals are password protected and the database of client information has several layers of security and password protection. Client records are not shared outside of the agency. 2-1-1 San Joaquin will keep client confidentiality a top priority and will require all staff to sign a confidentiality agreement upon hire.

The 2-1-1 San Joaquin database is maintained according to the AIRS I&R Resource File Standards and will be used by I&R Specialists when assisting callers.

2-1-1 San Joaquin has developed a policy that details criteria for inclusion in the resource database based on the AIRS standards. This policy will be posted on the 2-1-1

San Joaquin website. An application for database inclusion will also be prepared and posted on the website along with the policy.

2-1-1 San Joaquin will use a standardized profile and checklist to collect data regarding all agencies and programs that qualify for inclusion in the resource database. Also, an annual comprehensive database review and update will be performed by I&R staff to continuously maintain the 2-1-1 San Joaquin database.

The 2-1-1 San Joaquin database is maintained according to the AIRS-Information Line of Los Angeles Taxonomy of Human Services and will use 2-1-1 Stanislaus' AIRS Information Line of Los Angeles Taxonomy of Human Services compliant database template as its foundation.

Safety Considerations

2-1-1 San Joaquin will provide services that promote and have an immediate positive impact on public safety during emergencies and disasters. The San Joaquin County's Office of Emergency Services has endorsed the 2-1-1 San Joaquin application. The 2-1-1 system is integrated into the County's Emergency public Information (EPI) system that will be available during disasters to all jurisdictions within San Joaquin County, allowing public officials to rapidly and effectively disseminate up-to-date, critical public information related to emergency/disaster incidents, including real-time status of the disaster, evacuations, road closures, shelters, affected areas, and recovery and relief programs. 2-1-1 San Joaquin will be an integral component of the entire emergency public information network.

2-1-1 San Joaquin services are available in the event of a local disaster or emergency. FRRC is contracting with 2-1-1 Fresno to provide emergency support during a disaster or emergency situation that causes calls to exceed the capacity of the 2-1-1 San Joaquin daytime service. 2-1-1 Fresno has emergency backup systems in place to respond to disaster or other emergencies. The 2-1-1 San Joaquin database will be stored through the secured iCarol server system that is used by other 2-1-1 California systems, including 2-1-1 Fresno. The local database has adequate redundancy to ensure uninterrupted operability and immediate accessibility by decision makers and leaders during disasters and major emergencies.

FRRC will develop a disaster plan for the 2-1-1 San Joaquin service. The disaster plan will detail the roles of each staff member, agreements with disaster service organizations, and an alternate worksite for I&R staff to ensure that the public will have access to information in the event of a disaster. FRRC is engaging the County Administrator's Office and Office of Emergency Management in the development of the 2-1-1 disaster plan. The county has a Disaster Relief Coalition of agencies that plan

community response to a possible emergency or disaster. FRRC will work with local emergency management personnel and with 2-1-1 California staff to coordinate the 2-1-1 San Joaquin disaster plan with a regional California 2-1-1 disaster response system. The regional system will construct a planned layer of backup and protocols for activating the statewide 2-1-1 network for disasters occurring in the San Joaquin County. The after-hours service provider 2-1-1 Fresno already has a disaster plan. The 2-1-1 San Joaquin and 2-1-1 Fresno disaster plans will be implemented as needed to assure that call services are available 24 hours a day, 7 days a week.

2-1-1 San Joaquin will also provide telephone and web-based services that promote and have positive public safety impact during non-emergency situations. iCarol, the system used as the 2-1-1 San Joaquin database software and server, allows I&R Specialists to track referrals given to each caller and identify gaps in service when no referrals are found to meet the caller's needs. Such data can be reported in the aggregate to assist in identifying service gaps and highlighting the greatest health and human service needs expressed by 2-1-1 San Joaquin callers. iCarol requires password access and has other security features to maintain confidentiality, and has a proven track record of data security. 2-1-1 San Joaquin will maintain 24 hours a day, seven days a week data security and confidentiality to protect inquirer data. 2-1-1 Fresno already has measures in place and will maintain them to protect 2-1-1 San Joaquin inquirer data.

The iCarol database software features report generation capabilities. Permission will be given to I&R Data Specialist and the I&R Center Data Manager to generate reports from the 2-1-1 San Joaquin database that could be used for internal analysis, advocacy, community planning activities, and more. Reports will be made available at no cost to partner organizations as needed and upon reasonable request. While protecting confidential personal information, the generated reports may include information on aggregate client demographic data, needs, unmet needs, number and type of information and assistance calls, advocacy and follow-up calls. In addition, data will be used to generate an aggregate monthly report to be shared with local government and non-profit agency leaders to assist with community planning.

FRRC has cooperative working relationships with targeted and local I&R's operating programs throughout San Joaquin County. For example, FRRC has relationships in place such as the El Concilio and Community Partnership for Families. These agencies have been included in the local and regional 2-1-1 planning process. FRRC participates in numerous collaborative efforts to enhance service delivery and reduce gaps in the provision of child care, health and human services. When a caller needs a service that is provided by a specialized I&R, they can be referred to that I&R.

Training will be provided for all aspects of the Information and Referral 2-1-1 service. 2-1-1 San Joaquin staff and volunteers will be trained on AIRS Standards-based curriculum delivered through classroom training, on-line training and shadowing

experience I&R Specialists. The staff development plan will include both initial and on-going training and will include instruction in best practice in information and referral call handling, the resources database and emergency preparedness.

FRRC plans to reassign current childcare program R&R staff, trained and experienced in providing information and referral services to 2-1-1 San Joaquin. Additional training will be provided through AIRS and CAIRS training resources. Staff will also shadow experienced I&R staff at the 2-1-1 Fresno call center.

2-1-1 services in emergency periods are complimentary to first responder and other emergency services. 2-1-1 activities generally consist of acquiring or verifying information essential to affected residents and the public. Information developed during emergencies include, but are not limited, to the following:

- Distribution of 2-1-1 promotional materials in English, Spanish and other key languages
- 2-1-1 promotions focused on licensed childcare providers, CalFresh, First 5 Initiatives, covered California health insurance exchange education and outreach, local telephone Consumer Support Warm Line service and other partner agencies
- 2-1-1 launch kickoff and outreach activities in key parts of the County
- 2-1-1 fliers and handouts to rural and underserved communities
- 2-1-1 demonstrations at community recreation service centers and events
- Media releases to local radio, television and print
- Promotion to government entities, service networks and organized community groups
- Posts in e-newsletters, FRRC website, community eboards and social networking sites
- Placement of 2-1-1 links on service provider websites in San Joaquin County
- 2-1-1 advertisements placed on buses or bus stops throughout San Joaquin County
- Inclusion of 2-1-1 information in city and county utility bills

As a means for evaluating program improvements on an annual basis, the 2-1-1 San Joaquin I&R Center Data Manager will oversee daily operations and will regularly monitor the I&R program to ensure that it is operating according to AIRS standards. The 2-1-1 Director will conduct random audits of the operation and develop a guide for monitoring and making improvements on the program. Findings will be used to develop a corrective action plan to implement adjustments to the process and procedures. The FRRC Board will review 2-1-1 reports quarterly for information and input. In addition, the 2-1-1 San Joaquin Steering Committee will review data analysis and meet quarterly to discuss additional reporting needs, gaps in database information, impact of 2-1-1 services on community members and needs associated with outreach

efforts. Therefore, an annual report will be submitted to the San Joaquin County Board of Supervisors identifying outcomes and annual plans.

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. FRRC included in its application 13 letters of endorsement from different organizations from a broad range of health and human service fields throughout San Joaquin County. These endorsements demonstrate broad community support.

In processing FRRC's 2-1-1 application, the Communications Division considered the input of the San Joaquin 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 San Joaquin 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.

On March 25, 2014, Robert V. Elliott, Chairman of the San Joaquin Board of Supervisors, sent a letter endorsing FRRC's application to serve as the 2-1-1 provider of San Joaquin County residents and employees. The Commission values the input of San Joaquin 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 San Joaquin 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 San Joaquin 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 of the Commission concludes that the application letter filed by Family Resource and Referral Center 2-1-1 San Joaquin 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. Family Resource and Referral Center of San Joaquin sent its application letter for certification as the 2-1-1 service provider for San Joaquin County to the Commission on April 2, 2014.
2. Family Resource and Referral Center of San Joaquin County filed a supplemental letter to include Public Safety matters to the Commission on April 2, 2014.
3. Family Resource and Referral Center of San Joaquin will provide immediate public safety impact during non-emergencies, emergencies and disasters such as providing a web-based and call-in information call center addressing public safety 24 hours a day, 7 days a week and will work closely with the Office of Emergency Services to assure that the partnership of 9-1-1 and 2-1-1 is effective.
4. Robert V. Elliott, Chairman of the San Joaquin Board of Supervisors, sent a letter to the Commission on March 25, 2014, endorsing the Family Resource and Referral Center of San Joaquin's application to serve as the 2-1-1 provider for San Joaquin County.
5. California Alliance of Information and Referral Services (CAIRS) emailed a letter to the Commission on May 1, 2014, supporting the Family Resource and Referral Center's application for 2-1-1 services in San Joaquin County.
6. The Communication Division of the CPUC concludes that the Family Resource and Referral Center of San Joaquin County'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. Family Resource and Referral Center of San Joaquin is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of San Joaquin County.
2. This authority is granted for an indefinite term, and is subject for 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 the Family Resource and Referral Center of San Joaquin cannot implement 2-1-1 dialing within a year after the Commission's approval, Family Resource and Referral Center of San Joaquin County's application for provision of 2-1-1 service in San Joaquin County 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 Family Resource and Referral Center of San Joaquin County shall lapse so that another Information and Referral Services provider may apply to offer service in a service territory that includes San Joaquin County.
4. Family Resource and Referral Center of San Joaquin County 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 business days after service begins.

Resolution T-17441
CD/CM3

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the California Public Utilities Commission at its regular meeting on August 14, 2014. The following Commissioners approved it:

/s/ PAUL CLANON

PAUL CLANON

Executive Director

MICHAEL R. PEEVEY

President

MICHEL PETER FLORIO

CATHERINE J.K. SANDOVAL

CARLA J. PETERMAN

MICHAEL PICKER

Commissioners