

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Consumer Programs Branch**

**RESOLUTION T-17689
March 12, 2020**

RESOLUTION

Resolution T-17689. Transfer of Sonoma County's 2-1-1 operation and grant of authority to United Way of the Wine Country to serve as the 2-1-1 service provider for Sonoma County.

SUMMARY

This resolution approves the transfer of the operation of Sonoma County's 2-1-1 service from the Volunteer Center of Sonoma County to the United Way of the Wine Country, and grants the United Way of the Wine Country the authority to use the 2-1-1 abbreviated dialing code to provide information and referral services to Sonoma County.

BACKGROUND

2-1-1 is the telephone number used to access non-emergency community information and referral (I&R) providers. Upon dialing 2-1-1, a caller in need is routed to a call center, where a referral specialist will refer or connect the caller to the appropriate agencies that will provide the needed social services, such as housing assistance, programs to assist with utility bills, food assistance, elderly or child care, and much more non-emergency information not currently provided by either 9-1-1 or 3-1-1 services.

On July 31, 2000, the Federal Communications Commission (FCC) issued its *N11 Third Report and Order* assigning the 2-1-1 code as the national abbreviated dialing code for information and referral services.¹ The FCC noted that the assignment is in the public interest and recognized that the public need for social service could be met through the

¹ *Third Report and Order and Order on Reconsideration*, FCC 00-256, CC Docket 92-105, released July 31, 2000 ("N11 Third Report and Order")

implementation of a 2-1-1 dialing program. The FCC encouraged the states to implement 2-1-1 programs² and directed that "states will be allowed to continue to make local [N11] assignments that do not conflict with [FCC] national assignments."³

On January 23, 2002, the California Public Utilities Commission (CPUC or Commission) instituted Rulemaking (R.) 02-01-025 to implement 2-1-1 dialing in the State of California. In Decision (D.) 03-02-029, the Commission adopted the regulatory policies and procedures needed to implement 2-1-1 dialing.⁴

On September 4, 2008, the Commission adopted Resolution T-17145, granting the Volunteer Center of Sonoma County (VCSC) the authority to use the 2-1-1 dialing code to provide information and referral (I&R) services to Sonoma County. VCSC introduced 2-1-1 service in Sonoma County in February 2009.

On October 3, 2019, the United Way of the Wine Country (UWWC) sent a copy of its application via email 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.

² *N11 Third Report and Order*, ¶21

³ *N11 Third Report and Order*, ¶43

⁴ D. 03-02-029 establishes 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 2-1-1 callers. The decision directs I&R providers seeking authority to provide 2-1-1 service to submit to the CPUC Executive Director a letter containing the information specified in the decision's Appendix A, which sets forth the standards and application procedures that ensure the selection of qualified I&R providers. I&R providers must obtain an 8YY number that payphone operators and competitive local exchange carriers may use to route 2-1-1 calls. Additionally, I&R providers must implement 2-1-1 service within one year of the Commission's grant of authority; failure to do will result in the Commission's rescission of the authority. D.03-02-029, February 13, 2003, http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/23645.pdf

On October 4, 2019, the Commission's Executive Director received via postal mail the application letter (application)⁵ submitted by UWWC, requesting certification as the 2-1-1 service provider in Sonoma County.

On January 16, 2020, the Commission's Executive Director received a letter from AT&T, requesting an extension of time until February 21, 2020 to file an advice letter for providing 2-1-1 switch translation services.⁶ On January 23, 2020, the Commission's Executive Director granted AT&T's request for extension of time.

The Communications Division (CD or staff) published notice of UWWC's application in the Commission Daily Calendar from October 4 through October 10, 2019. The Commission received no comments in response to the notice.

DISCUSSION

United Way of the Wine Country's Application

The application for 2-1-1 service is organized into four sections. UWWC provided information for each of the four sections as discussed below.

Section 1- Organizational Structure, Background and Experience

Sonoma County is located in California's north coast in the San Francisco Bay Area, north of San Francisco. Sonoma County currently has 2-1-1 service. The current provider is VCSC. Sonoma County's 2-1-1 service (2-1-1 Sonoma) has not had any reported issues since its inception; however, VCSC is requesting to discontinue its role as the provider, and has a provisional agreement with UWWC for it to assume its duties. VCSC informed CD in June 2019 of its desire to transfer the 2-1-1 Sonoma operation to UWWC. CD

⁵ 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.

⁶ D.03-02-029 directs that within four months of the filing of a letter by an I&R provider 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 2-1-1 switch translation services at reasonable rates and to offer the services within six months of the advice letter filing. If AT&T or Frontier Telephone Company serves the territory over which the 2-1-1 service will be offered, the serving carrier shall file advice letters proposing general tariffs, tariffs developed on an individual case basis, or contracts to make the requested service available. All other incumbent local carriers and competitive local carriers serving the territory over which the 2-1-1 service will be offered shall provide the needed switch translation service and submit advice letter follow that of AT&T's or Frontier's by no more than 30 days. Other incumbent local carriers may either concur in the price terms offered by AT&T or Frontier, or submit their own cost support information. Competitive local carriers may elect to implement 2-1-1 call origination using only 8YY routing.

discussed the matter with VCSC and UWWC via conference calls, and directed UWWC to submit an application to request authority to serve as the 2-1-1 service provider for Sonoma County. UWWC submitted its application to the Commission in October 2019.

UWWC is a 501(c)(3) tax exempt organization. UWWC was incorporated in 1968 as United Way of Sonoma County and is now called UWWC. UWWC provides services to Sonoma, Mendocino, Lake, Humboldt and Del Norte Counties in the areas of education, financial stability, health, and disaster relief, but will provide 2-1-1 service to Sonoma County only.

UWWC's application is accompanied by supporting documentation, which includes an audited financial statement and a proposed three-year budget that demonstrate UWWC is a solvent entity with the appropriate budgetary planning to support the expenses related to providing 2-1-1 service. The President and Chief Executive Officer of UWWC will oversee the implementation of 2-1-1 Sonoma, and two UWWC staff members will serve as the 2-1-1 community liaisons.

UWWC has the organizational capacity and the knowledge to provide 2-1-1 service, and has strong ties to the community. UWWC has been involved in information and referral (I&R) service since 1983 when VCSC, in conjunction with UWWC and the County of Sonoma Human Services Department, started the Volunteer Center I&R Service that was later transitioned to 2-1-1 Sonoma in February 2009. UWWC has been a funder of 2-1-1 Sonoma since its inception, and is a former member of the 2-1-1 statewide steering committee. UWWC is also a member of the United Ways of California Operating Partnership, a statewide partnership of local United Ways. UWWC serves the community through many services and programs in education, financial assistance, health, and disaster relief.

UWWC has contracted with Interface Children and Family Service (Interface) for 2-1-1 call center and database management services. Interface, located in Ventura County, has served as the 2-1-1 service provider for Ventura County since 2005, and currently supports eighteen other California counties and one Illinois county⁷ via contracts in various aspects of 2-1-1 service. Interface was also granted the authority to serve as the disaster 2-1-1 service provider for twelve unserved California counties in Resolution

⁷ Interface supports the following 18 California counties and 1 Illinois county through contracts: Santa Barbara, Monterey, San Luis Obispo, Shasta, Tehama, San Francisco, San Mateo, Solano, Santa Cruz, Marin, Napa, San Benito, Santa Clara, San Joaquin, Fresno, Orange, El Dorado, and Sonoma Counties in California, and Lake County in Illinois.

T-17679 on November 7, 2019⁸. Interface provides a broad range of I&R services and systems such as the Ventura County Homeless Management System, a database used to assist with the allocation of services and resources for the homeless population.

Section 2 – Terms and Conditions of Service

UWWC states that it does not and will not accept fees from referred organizations in return for referrals, and that it will provide 2-1-1 service free of charge to callers with no commercial interruptions. Interface will answer each 2-1-1 call by phone or by text message with live help 24 hours a day, 7 days a week, regardless of language or disability. Interface will also provide referrals through the 2-1-1 Sonoma website. Interface is staffed with bilingual 2-1-1 personnel to assist non-English speaking callers. Translation services are available to provide live phone translation in over 150 languages. Interface uses the Internet Protocol Teletype (TTY) system to provide TTY access for deaf and disabled callers.

Section 3 – Alliance of Information and Referral Services Standards

The Alliance of Information and Referral Services (AIRS)⁹, the national professional membership organization of information and referral service providers, has established standards for delivery of information and referral services. UWWC's application describes the following 2-1-1 policies that conform to the standards established by AIRS for the delivery of I&R and 2-1-1 services:

- Maintain internal protocols ensuring callers are assessed and referred to the needed resources, including a threat assessment protocol directing I&R staff to transfer callers in crisis directly to 9-1-1 or the local crisis centers, and follow-up calls with at-risk callers to ensure their needs are met.
- Update resource database annually to ensure it is comprehensive, accurate and up-to-date with local, state and national services.
- Secure call center space with locked entrance, store client files in locked cabinets, password-protect computers, and restrict database access to I&R personnel only to ensure client confidentiality.

⁸ Interface will provide disaster 2-1-1 service to the counties of Alpine, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Mono, Siskiyou, Sutter, and Trinity.

⁹ AIRS' guidelines are the basis for the service delivery standards associated with use of the 2-1-1 dialing code as specified by D.03-02-029. D.03-02-029, February 13, 2003,
http://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/23645.PDF

- Has clear resource database inclusion/exclusion criteria, which are publicly available on the 2-1-1 Sonoma website.
- Collect data on 2-1-1 calls received, referrals made and/or lack of available referrals, aggregate data, and produce reports for internal analysis and community planning.
- Maintain disaster plans and a pre-disaster resource database containing ongoing public safety services, and ensure 2-1-1 service is available during disasters.
- Develop partnerships with other 2-1-1 and I&R providers, train I&R staff on all areas of I&R and 2-1-1, and increase public awareness of 2-1-1.

These policies indicate that UWWC will adhere to the AIRS standards for delivery of 2-1-1 service.

Section 4 – Documentation of Community Support

On August 2, 2019, the County of Sonoma Board of Supervisors endorsed UWWC as the provider of 2-1-1 Sonoma and authorized funding for UWWC to provide 2-1-1 service for Sonoma County. The County of Sonoma Human Services Department, on August 6, 2019, and the County of Sonoma Office of Education, on August 2, 2019, also endorsed UWWC as the provider of 2-1-1 Sonoma. UWWC received a total of thirteen endorsement letters, ten from local organizations in the fields of health and human services, and three from the County of Sonoma Board of Supervisors, Human Services Department, and Office of Education. These endorsements indicate support from the community and local governments for UWWC as the local 2-1-1 service provider.

Safety Considerations

The topography, climate and vegetation growth in Sonoma County create wildfire hazards in many parts of the county.¹⁰ The California Department of Forestry and Fire Protection's fire hazard severity zones maps show large areas of Sonoma County are in high or very high fire hazard zones.¹¹ In recent years, Sonoma County was severely impacted by wildfires.

To ensure disaster preparedness, UWWC has developed an Emergency Operations Plan (EOP) that will guide the organization's operations during emergencies and disasters. As

¹⁰ Sonoma County Hazard Mitigation Plan, April 2017, <https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Hazard-Mitigation/Approved-Update/>

¹¹ Cal Fire Sonoma County Fire Hazard Severity Zone Map, https://osfm.fire.ca.gov/media/6822/fhszs_map49.pdf

part of the EOP, the 2-1-1 Sonoma service has been integrated into Sonoma County's emergency public information system to disseminate public information during a disaster. UWWC has established liaison with the County of Sonoma Emergency Operations Center, and will have representation at Emergency Operations Center to coordinate directly with the County of Sonoma emergency operations personnel. In the event of a disaster, UWWC will work with Interface to disseminate critical public information, such as information on evacuations, shelters, road closures, utility outages, and other disaster-related information. 2-1-1 Sonoma will have a direct, positive public safety impact on Sonoma County residents during emergencies and disasters.

Implementation of 2-1-1 Calling

The 2-1-1 Sonoma switch translation services that VCSC has established with telecommunications carriers serving Sonoma County will continue unaffected by the transition of the 2-1-1 Sonoma operation from VCSC to UWWC. In accordance with Ordering Paragraph 5 of D. 03-02-029¹², UWWC will provide a toll free 8YY number that competitive local exchange carriers may use to route 2-1-1 calls. To ensure a smooth transition, UWWC will use the same toll free number previously used by VCSC for toll free 2-1-1 call routing. UWWC will also maintain the same local number that was used by VCSC for local 2-1-1 call routing.

On January 16, 2020, AT&T submitted a letter to the Commission's Executive Director, requesting a 29-day extension until February 21, 2020 to file an advice letter to provide 2-1-1 services in Sonoma County, as required by D. 03-02-029. On January 23, 2020, the Commission's Executive Director granted AT&T extension request. The extension of time for AT&T's advice letter filing will result in a delay in 2-1-1 switch translation services being made available by AT&T.

Staff Conclusions and Recommendations

CD concludes that UWWC has the qualifications and financial viability to serve as the 2-1-1 provider for Sonoma County, and UWWC's application meets the requirements set forth in D.03-02-029. CD finds that granting the authority requested is in the public interest and will promote the public safety of Sonoma County. Additionally, the grant of authority conforms to the FCC's delegation of authority to the states to implement 2-1-1 programs.¹³ Therefore, CD recommends that the Commission grant UWWC's request to

¹² D.03-02-029, Ordering Paragraph 5 states, "Those implementing 2-1-1 service shall obtain an 8YY phone number that payphone operators and competitive local exchange carriers may use to direct calls to the I&R provider."

¹³ *N11 Third Report and Order*

use the 2-1-1 dialing code to provide I&R services to Sonoma County, and approve the transfer of the 2-1-1 Sonoma operation from VCSC to UWWC.

Terms and Conditions of the Authority

The authority granted by this resolution is not transferable except upon Commission approval. Should the County of Sonoma Board of Supervisors wishes to rescind, reassign, or modify its authority to use 2-1-1 dialing, it can provide a letter to the Commission's Executive Director. The transfer of the 2-1-1 Sonoma operation from VCSC to UWWC must be completed without interruption in 2-1-1 service. AT&T must ensure 2-1-1 service in Sonoma County is not interrupted due to the delay in its advice letter filing proposing tariffs for 2-1-1 switch translation. Within 90 days of completion of the transfer, UWWC is required to notify the Director of CD via email at CDcompliance@cpuc.ca.gov of the transfer's completion. UWWC is required to seek approval from the Commission via a letter to the Director of CD 30 days in advance of any changes to the geographic area served, vendor for call center and/or database management services, or the ability to continue as the 2-1-1 service provider in Sonoma County.

D.03-02-029 does not require renewal of the authority granted to an I&R provider to provide 2-1-1 service or recertification of the I&R provider to whom the authority was granted. However, it is important that the Commission is kept informed and updated regularly on the services provided under the authority granted. Therefore, UWWC will be required to report to the Director of CD via email at CDcompliance@cpuc.ca.gov by March 1 of each calendar year the following information:

- a) Name of organization providing 2-1-1 service to Sonoma County and contact information (include person to contact)
- b) Geographic area(s) served
- c) Name of vendor providing 2-1-1 call center services and contact information
- d) Name of vendor providing resource database services and contact information
- e) Name of vendor providing after-hour service and contact information
- f) Summary (not to exceed one page) of the 2-1-1 services provided during the previous calendar year, with specific mentions of all declared and non-declared disasters and emergencies during which 2-1-1 was activated.

COMMENTS

In compliance with Public Utilities Code § 311(g)(1), the Commission emailed a notice letter on February 7, 2020, informing the parties on the R.02-01-025 service list of the availability of this resolution for public comments at the Commission's website www.cpuc.ca.gov. The notice letter also informed parties that the final confirmed resolution adopted by the Commission will be posted and available at the same website.

FINDINGS

1. On October 4, 2019, the Commission's Executive Director received via postal mail the application letter (application) submitted by the United Way of the Wine County (UWWC), requesting certification as the 2-1-1 service provider in Sonoma County. On October 3, 2019, UWWC sent a copy of its application via email to SBC Communications, now AT&T, as well as to the service list for Rulemaking 02-01-025, which includes the appropriate incumbent local exchange carriers.
2. On January 16, 2020, the Commission's Executive Director received a letter from AT&T, requesting an extension of time until February 21, 2020 to file an advice letter for providing 2-1-1 switch translation services.¹⁴ On January 23, 2020, the Commission's Executive Director granted AT&T's request for extension of time.
3. Sonoma County currently has 2-1-1 service. The current provider is the Volunteer Center of Sonoma County (VCSC).
4. Sonoma County's 2-1-1 service has not had any reported issues since its inception; however, the current provider, VCSC, is requesting to discontinue its role as the provider, and has a provisional agreement with UWWC for it to assume its duties.
5. UWWC is a 501(c)(3) tax exempt organization. UWWC was incorporated in 1968.

¹⁴ D.03-02-029 directs that within four months of the filing of a letter by an I&R provider 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 2-1-1 switch translation services at reasonable rates and to offer the services within six months of the advice letter filing. If AT&T or Frontier Telephone Company serves the territory over which the 2-1-1 service will be offered, the serving carrier shall file advice letters proposing general tariffs, tariffs developed on an individual case basis, or contracts to make the requested service available. All other incumbent local carriers and competitive local carriers serving the territory over which the 2-1-1 service will be offered shall provide the needed switch translation service and submit advice letter follow that of AT&T's or Frontier's by no more than 30 days. Other incumbent local carriers may either concur in the price terms offered by AT&T or Frontier, or submit their own cost support information. Competitive local carriers may elect to implement 2-1-1 call origination using only 8YY routing.

6. The President and Chief Executive Officer of UWWC will oversee the implementation of the Sonoma County 2-1-1 service, and has contracted with Interface Children and Family Service for 2-1-1 call center and database management services. Both UWWC and Interface are experienced in providing information and referral services.
7. On August 2, 2019, the County of Sonoma Board of Supervisors endorsed UWWC as the new provider of 2-1-1 Sonoma and authorized funding for UWWC to provide 2-1-1 service for Sonoma County. UWWC received support from local elected officials, and health and human services organizations for its request to serve as the local 2-1-1 service provider.
8. UWWC's application meets the requirements set forth in Decision 03-02-029.
9. Granting UWWC's request to use the 2-1-1 dialing code to provide I&R services is in the public interest as 2-1-1 will promote the public safety of Sonoma County, and conforms to the Federal Communications Commission's delegation of authority to the states to implement 2-1-1 programs.
10. The authority granted to UWWC to provide 2-1-1 service is not transferrable except upon Commission approval.
11. UWWC should be required to notify the Commission via a letter to the Director of Communications Division 30 days in advance of any changes to the geographic area served, vendor for call center and/or database management services, or the ability to continue as a 2-1-1 service provider in Sonoma County.
12. UWWC should be required to report to the Director of Communications Division by March 1 of each calendar year information about the 2-1-1 service.
13. The transfer of the 2-1-1 Sonoma operation from VCSC to UWWC must be completed without interruption in 2-1-1 service. Within 90 days of completion of the transfer, UWWC should be required to notify the Director of Communications Division of the transfer's completion.

THEREFORE, IT IS ORDERED that:

1. United Way of the Wine Country is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral services to Sonoma County.
2. The transfer of the operation of Sonoma County's 2-1-1 service from the Volunteer Center of Sonoma County to the United Way of the Wine Country is approved.
3. United Way of the Wine Country shall not transfer the authority granted except upon Commission approval.
4. United Way of the Wine Country shall be required to notify the Commission via a letter to the Director of Communications Division 30 days in advance of any changes to the geographic area served, vendor for call center and/or database management services, or the ability to continue as a 2-1-1 service provider in Sonoma County.
5. United Way of the Wine Country shall be required to report to the Director of Communications Division via email at CDcompliance@cpuc.ca.gov by March 1 of each calendar year the following information:
 - a) Name of organization providing 2-1-1 service to Sonoma County and contact information (include person to contact)
 - b) Geographic area(s) served
 - c) Name of vendor providing 2-1-1 call center services and contact information
 - d) Name of vendor providing resource database services and contact information
 - e) Name of vendor providing after-hour service and contact information
 - f) Summary (not to exceed one page) of the 2-1-1 services provided during the calendar year, with specific mentions of all declared and non-declared disasters and emergencies during which 2-1-1 was activated.
14. The transfer of the 2-1-1 Sonoma operation from the Volunteer Center of Sonoma County to the United Way of the Wine Country shall be completed without interruption in 2-1-1 service.
15. AT&T shall ensure 2-1-1 service in Sonoma County is not interrupted due to the delay in its advice letter filing proposing tariffs for 2-1-1 switch translation.

16. Within 90 days of completion of the transfer, the United Way of the Wine Country shall be required to notify the Director of Communication Divisions via email at CDcompliance@cpuc.ca.gov of the transfer's completion.

This Resolution is effective today.

I hereby certify that the California Public Utilities Commission at its regular meeting on _____ adopted this Resolution. The following Commissioners approved it:

Alice Stebbins
Executive Director