

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

**Communications Division  
Consumer Programs Branch**

**RESOLUTION T-17760  
January 27, 2022**

**RESOLUTION**

Resolution T-17760 Transfer of Mendocino 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 Mendocino County.

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**SUMMARY**

This resolution approves the transfer of the operation of Mendocino County's 2-1-1 service from the Inland Empire United Way 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 Mendocino 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 childcare, 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.<sup>1</sup> The FCC concluded the assignment is in the public

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<sup>1</sup> *Third Report and Order and Order on Reconsideration*, FCC 00-256, CC Docket 92-105, released July 31, 2000 (“*N11 Third Report and Order*”).

interest, recognizing that the public need for social service could be met through the implementation of a 2-1-1 dialing program. The FCC encouraged the states to implement 2-1-1 programs<sup>2</sup> and directed that "states will be allowed to continue to make local [N11] assignments that do not conflict with [FCC] national assignments."<sup>3</sup>

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 California. In Decision (D.) 03-02-029, the Commission adopted the regulatory policies and procedures for 2-1-1 dialing.<sup>4</sup> Among other requirements, D.03-02-029 requires I&R service providers seeking authority to provide 2-1-1 service to submit a formal letter to the Executive Director of the Commission for review and certification of the I&R provider(s) and a service rollout plan. The Commission states, "The Commission's staff will apply the Guidelines for Staff Review included in Appendix A to this Decision and prepare a resolution for the Commission's consideration to accept, reject, or modify the proposed plan. These letters should be served on the ILECs, as appropriate and on all parties to this proceeding."<sup>5</sup> The decision declined to set deadlines for the review of the letters requesting certification of I&R providers and the commencement of 2-1-1 service, favoring instead a combination of milestones and deadlines: "In particular, we expect that the Commission would require approximately six months to review and approve a specific 2-1-1 proposal, including the certification of I&R providers."<sup>6</sup>

On December 17, 2009, the Commission adopted Resolution T-17218, granting the Volunteer Center of Sonoma County (VCSC) the authority to use the 2-1-1 dialing code to provide I&R services to Mendocino County.

On June 13, 2013, the Commission received a notification letter from VCSC, dated May 30, 2013, informing the Commission that VCSC was transferring Mendocino County's 2-1-1 service operations to Inland Empire United Way (IEUW) beginning July 2013. IEUW did not submit an application letter to the CPUC's Executive Director

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<sup>2</sup> *N11 Third Report and Order*, ¶21

<sup>3</sup> *N11 Third Report and Order*, ¶43

<sup>4</sup> See D.03-02-029, Appendix A. The full text of the decision is available online at: [http://docs.cpuc.ca.gov/word\\_pdf/FINAL\\_DECISION/23645.pdf](http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/23645.pdf)

<sup>5</sup> *Id.* at 32; Conclusion of Law 3; Ordering Paragraph 2.

<sup>6</sup> *Id.* at 33.

subsequently to seek 2-1-1 I&R provider certification as required by D.03-02-029 and began commencing 2-1-1 service without following proper Commission protocols.<sup>7</sup>

On June 30, 2021, the Commission's Executive Director received via email the application letter (application)<sup>8</sup> submitted by the United Way of the Wine Country (UWWC), requesting certification as the 2-1-1 service provider in Mendocino County.

On July 1, 2021, 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.

The Communications Division (CD or staff) published notice of UWWC's application in the Commission Daily Calendar for five business days from July 15 to July 21, 2021. The Commission received no comments in response to the notice.

## **DISCUSSION**

Mendocino County is located on the north coast of California, approximately halfway between the San Francisco Bay Area and the Oregon border. Mendocino County currently has 2-1-1 service. The Commission granted the authority to VCSC in Resolution T-17218 on December 17, 2009. In June 2013, VCSC transferred the 2-1-1 Mendocino operation to IEUW. IEUW did not seek I&R provider certification as required by D.03-02-029 and had been operating as Mendocino County's 2-1-1 service provider since July 2013 without Commission authorization. Consequently, VCSC is the provider that currently holds the authority granted by the Commission to provide 2-1-1 service for Mendocino County.

### **United Way of the Wine Country's Application**

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

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<sup>7</sup> It is unclear why the CD failed to act on IEUW's uncertified commencement of 2-1-1 service after receiving VCSC's notice of transfer. Regardless, beginning March 2013, CD Staff began a concerted effort to ensure compliance with the directives provided in D.03-02-029.

<sup>8</sup> 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.

*Section 1- Organizational Structure, Background and Experience*

In June 2021, UWWC and IEUW jointly agreed that UWWC will take over the 2-1-1 Mendocino operation effective July 1, 2021. On June 30, 2021, UWWC submitted an application letter to the Commission requesting approval of the transfer and authority to serve as the 2-1-1 provider for Mendocino County.

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 community services and programs in education, financial assistance, health, and disaster relief, and partners with local organizations and county governments to improve communities, serving Sonoma, Mendocino, Lake, Humboldt and Del Norte Counties.

UWWC states it has the organizational capacity and the knowledge to provide 2-1-1 service. UWWC currently provides 2-1-1 service for Sonoma County,<sup>9</sup> was a funder of 2-1-1 Mendocino and served on the 2-1-1 statewide steering committee from 2009 to 2015.

UWWC includes in its application an audited financial statement and a proposed three-year budget to demonstrate that it is a solvent entity with the appropriate budgetary planning to support 2-1-1 service. The President and Chief Executive Officer of UWWC, and the Executive Vice President of UWWC will oversee the implementation of 2-1-1 Mendocino, and one UWWC staff member will serve as the 2-1-1 community liaison.

UWWC states it contracted with Interface Children and Family Service (Interface) for 2-1-1 call center and database management services. Interface, located in Ventura County, served as the 2-1-1 service provider for Ventura County since 2005, and currently supports numerous other California counties and one Illinois county via contracts in various aspects of 2-1-1 service.<sup>10</sup> In November 7, 2019, the Commission granted Interface the authority to serve as the disaster 2-1-1 service provider for twelve unserved California counties in Resolution T-17679.<sup>11</sup> Interface provides a broad range of I&R services and systems such as the Homeless Management Information System, a

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<sup>9</sup> On March 12, 2020, in Resolution T-17689, the Commission granted UWWC the authority to provide 2-1-1 service for Sonoma County.

<sup>10</sup> Interface supports numerous California counties and 1 Illinois county through contracts, including 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.

<sup>11</sup> Interface provides disaster 2-1-1 service to the counties of Alpine, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Mono, Siskiyou, Sutter, and Trinity.

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 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 Mendocino 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)<sup>12</sup>, the national professional membership organization of information and referral service providers, established standards for delivery of information and referral services. UWWC's application indicates its 2-1-1 policies 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.
- Has clear resource database inclusion/exclusion criteria, which are publicly available on the 2-1-1 Mendocino website.

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<sup>12</sup> 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. See, D.03-02-029, p. 13.

- 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.

#### *Section 4 – Documentation of Community Support*

UWWC received a total of six endorsement letters, four from local organizations in the fields of health and human services, one from the County of Mendocino Board of Supervisors and one from California State Senator Mike McGuire.<sup>13</sup> These endorsements indicate support from the community and local governments for UWWC as the local 2-1-1 service provider.

#### **Safety Considerations**

Outbreaks of wildfire occur routinely during Mendocino’s dry season.<sup>14</sup> The California Department of Forestry and Fire Protection’s fire hazard severity zones map shows Mendocino County has areas that are in high or very high fire hazard zones.<sup>15</sup>

UWWC and Interface each maintains disaster preparedness plans. UWWC developed an Emergency Operations Plan (EOP) that will guide the organization’s operations during emergencies and disasters. As part of the EOP, UWWC developed a close liaison with the County of Mendocino Emergency Operations Center and designated a UWWC representative at the County’s Emergency Operations Center. These arrangements will coordinate the County’s emergency operations personnel and provide reliable and timely information to Interface during a disaster. Upon the Commission’s grant of authority to provide 2-1-1 service, UWWC will integrate the 2-1-1 Mendocino service into the County’s emergency public information system to disseminate public information during a disaster. Interface’s disaster plan includes plans for service expansion and service

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<sup>13</sup> On June 9, 2021, the County of Mendocino Board of Supervisors endorsed UWWC as the provider of 2-1-1 service for Mendocino County. On June 29, 2021, California State Senator Mike McGuire also endorsed UWWC as the 2-1-1 service provider for Mendocino County.

<sup>14</sup> Fire Vulnerability Assessment for Mendocino County, Mendocino Council of Governments, August 2020, <https://www.mendocinocog.org/files/7261d7732/FireVulnerabilityAssessment.pdf>

<sup>15</sup> Cal Fire Mendocino County Fire Hazard Severity Zone Map, [https://osfm.fire.ca.gov/media/6482/fhszs\\_map23.jpg](https://osfm.fire.ca.gov/media/6482/fhszs_map23.jpg)

continuity and plans for shifting service to an alternate location in the event of an emergency at the Interface call center. During 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. UWWC's application indicates that 2-1-1 Mendocino will have a direct, positive public safety impact on Mendocino County residents during emergencies and disasters.

### **Implementation of 2-1-1 Calling**

The 2-1-1 Mendocino switch translation services established with telecommunications carriers serving Mendocino County will continue unaffected by the transition of the 2-1-1 Mendocino operation from IEUW to UWWC. In accordance with D.03-02-029, Ordering Paragraph 5,<sup>16</sup> 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 used by IEUW for toll free 2-1-1 call routing. UWWC will also maintain the same local number used by IEUW for local 2-1-1 call routing.

### **Staff Conclusions and Recommendations**

Based on the review of the application, CD determines that UWWC possesses the qualifications and financial viability to serve as the 2-1-1 provider for Mendocino County. UWWC properly filed the transfer request, and the application meets the requirements set forth in D.03-02-029. Granting the authority requested is in the public interest and will promote the public safety of Mendocino County. Additionally, granting the authority follows the FCC's delegation of authority to the states to implement 2-1-1 programs.<sup>17</sup> This resolution also assures that UWWC receives the required formal approval from the Commission for the transfer of the 2-1-1 Mendocino operation, unlike the transfer with UWWC's predecessor. Accordingly, CD recommends that the Commission grant UWWC's request to use the 2-1-1 dialing code to provide I&R services to Mendocino County and approve the transfer of the 2-1-1 Mendocino operation from IEUW 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 Mendocino Board of Supervisors wish to rescind,

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<sup>16</sup> D.03-02-029, OP 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."

<sup>17</sup> *N11 Third Report and Order*, ¶43

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 Mendocino operation from IEUW to UWWC must be completed without interruption in 2-1-1 service. Within 90 days of completion of the transfer, UWWC is required to notify the Director of CD via email at [CDcompliance@cpuc.ca.gov](mailto: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 Mendocino 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 shall report to the Director of CD via email at [CDcompliance@cpuc.ca.gov](mailto:CDcompliance@cpuc.ca.gov) by March 1 of each calendar year the following information:

- a) Name of organization providing 2-1-1 service to Mendocino 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.

UWWC shall continue to report this information to the Commission for the duration of its provision of 2-1-1 service to Mendocino County, or until there is an effective termination of authority by the CPUC or the County of the Board of Supervisors<sup>18</sup>.

## COMMENTS

In compliance with Public Utilities Code § 311(g)(1), the Commission emailed a notice letter on December 24, 2021, 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,

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<sup>18</sup> Resolution T-16776 granting the Information & Referral Federation of Los Angeles County, Inc., dba INFO LINE of Los Angeles (INFO LINE) the authority to use the 2-1-1 dialing code to provide 2-1-1 service to Los Angeles County, October 16, 2003, Finding 7 and Ordering Paragraph 2



[www.cpuc.ca.gov](http://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 June 30, 2021, the Commission's Executive Director received via email the application letter (application) submitted by the United Way of the Wine County (UWWC), requesting certification as the 2-1-1 service provider in Mendocino County. On July 1, 2021, 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. Mendocino County currently has 2-1-1 service. The Volunteer Center of Sonoma County (VCSC) is the provider that currently holds the authority granted by the Commission in December 2009.
3. In June 2013, VCSC transferred Mendocino County's 2-1-1 service (2-1-1 Mendocino) operation to Inland Empire United Way (IEUW). IEUW did not submit an application to the Commission's Executive Director as directed in Decision 03-02-029 and began providing 2-1-1 service for Mendocino County without prior Commission authorization.
4. Pursuant to Decision 03-02-029, UWWC submitted an application to the Commission's Executing Director, requesting Commission approval for the transfer of the 2-1-1 Mendocino operation, and authority to serve as the 2-1-1 provider for Mendocino County.
5. UWWC is a 501(c)(3) tax exempt organization that was incorporated in 1968.
6. The President and Chief Executive Officer of UWWC and the Executive Vice President of UWWC will oversee the implementation of 2-1-1 Mendocino.
7. UWWC contracted with Interface Children and Family Service (Interface) for 2-1-1 call center and database management services. Both UWWC and Interface are experienced in providing information and referral services.
8. On June 9, 2021, the County of Mendocino Board of Supervisors endorsed UWWC as the new provider of 2-1-1 service in Mendocino 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.

9. UWWC's properly filed its transfer request in accordance with policies and procedures established in Decision 03-02-029, and its application meets the requirements set forth in Decision 03-02-029.
10. 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 Mendocino County and conforms to the Federal Communications Commission's delegation of authority to the states to implement 2-1-1 programs.
11. The Commission received no public comments.
12. The authority granted to UWWC to provide 2-1-1 service is not transferrable except upon Commission approval.
13. 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 Mendocino County.
14. 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.
15. The transfer of the 2-1-1 Mendocino operation from IEUW 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 Mendocino County.
2. The transfer of the operation of Mendocino County's 2-1-1 service from the Inland Empire United Way 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 Mendocino County.
5. United Way of the Wine Country shall be required, for the duration of its provision of service, to report to the Director of Communications Division via email at [CDcompliance@cpuc.ca.gov](mailto:CDcompliance@cpuc.ca.gov) by March 1 of each calendar year the following information:
  - a) Name of organization providing 2-1-1 service to Mendocino 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.
16. The transfer of the 2-1-1 Mendocino operation from the Inland Empire United Way to the United Way of the Wine Country shall be completed without interruption in 2-1-1 service.
17. 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](mailto: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:

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Rachel Peterson  
Executive Director