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Decision 03-02-029 February 13, 2003

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

Order Instituting Rulemaking to Implement 2-1-1  
Dialing in California.

Rulemaking 02-01-025  
(Filed January 23, 2002)

**DECISION ESTABLISHING PROCEDURES  
FOR IMPLEMENTING 2-1-1 DIALING IN CALIFORNIA**

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**DECISION ESTABLISHING PROCEDURES  
FOR IMPLEMENTING 2-1-1 DIALING IN CALIFORNIA**

**I. Summary**

This decision adopts the regulatory policies and procedures needed to implement 2-1-1 dialing, whereby Californians can obtain information about, and referral to, community social services via the 2-1-1 abbreviated dialing code. The regulations adopted here conform to the Federal Communications Commission's (FCC) delegation of authority to the states and will result in a program that resembles those already adopted in other states.

The decision establishes guidelines and procedures whereby the Commission can certify information and referral (I&R) providers as eligible to purchase network telephone service that will enable them to receive calls from those who dial 2-1-1. The decision requires all local exchange carriers to provide 2-1-1 call origination services at reasonable rates in those territories that will be served by 2-1-1 I&R providers. Consistent with our Scoping Memo, we do not address the situation of wireless carriers.

Consistent with FCC rules and the public interest, payphone operators in those territories receiving 2-1-1 service must discontinue any incompatible use of 2-1-1 dialing and must route calls to I&R providers. In addition absent FCC clarification of the appropriate price for 211 calls dialed from payphones, we do not mandate a price for these calls. We note that calls routed as 8YY calls will be compensated under existing FCC policies. No pay phone should be compensated twice for a single call. We urge all payphone operators to recognize that 211 calls are, in many cases, an alternative to 911 calls, and we urge them to refrain from charging callers dialing 211.

The decision permits I&R providers to secure 2-1-1 call origination service from incumbent carriers using the architecture of their choice. I&R providers, on

the other hand, must secure an 8YY number and 800 service for call routing by payphone operators or competitive local exchange carriers who prefer to use this network architecture to provide 2-1-1 call origination services.

To speed implementation, we establish a series of deadlines and milestones for securing the timely and smooth implementation of 2-1-1 I&R services. Finally, we provide for rescission of the certification of a 2-1-1 I&R service provider upon its failure to introduce this 2-1-1 service within a year of the Commission's granting of the necessary approvals needed to implement this service. Such approvals will be deemed complete upon Commission certification of I&R providers and the approval of 2-1-1 origination service.

## **II. Procedural Background**

2-1-1 is the national abbreviated dialing code designated by the FCC to be used to access non-emergency community I&R providers. The FCC found that “[i]ndividuals facing serious threats to life, health, and mental well-being have urgent and critical human needs that are not addressed by dialing 911 for emergency assistance or 311 for non-emergency police assistance.”<sup>1</sup> Upon dialing 2-1-1, a caller is routed to a referral service and then to an agency that can provide information concerning social services such as housing assistance,

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<sup>1</sup> See *Third Report and Order and Order for Reconsideration*, FCC 00-256, *In the Matter of the Petition by the United States Department of Transportation for Assignment of an Abbreviated dialing Code (N11) to Access Intelligent Transportation Systems (ITS) Services Nationwide*, NSD-L-24; *In the Matter of the Request by the Alliance of Information and Referral Systems, United Way of America, United Way 2-1-1 (Atlanta, Georgia), United Way of Connecticut, Florida Alliance of Information and Referral Services, Inc. and Texas I&R Network for Assignment of 2-1-1 Dialing Code*, NSD-L-98-80; and *in the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket 92-104, released July 31, 2000 (“*N11 Third Report and Order*”), ¶ 18.

programs to assist with utility bills, food assistance and other less urgent situations not currently addressed by either 911 or 311 services.

On August 30, 2001, the California Alliance of Information and Referral Services and the 2-1-1 Statewide Steering Committee (collectively known as “CAIRS”) petitioned the Commission to implement 2-1-1 dialing in California. On January 23, 2002, the Commission responded to CAIRS’ petition and instituted Rulemaking (R.) 02-01-025, thereby initiating the requested rulemaking into the implementation of 2-1-1 dialing in the State of California.

On February 22, 2002, consistent with the timetable proposed in R.02-01-025, parties to the proceeding filed Opening Comments.<sup>2</sup> On March 29, the Commission received Reply Comments.<sup>3</sup>

On March 8, 2002, Commissioner Duque and Administrative Law Judge (ALJ) Sullivan presided over a PHC in San Francisco to address the scope of issues in the proceeding, to clarify issues raised in the Opening Comments, and to determine a schedule for resolving them.

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<sup>2</sup> The filing parties include: the Pacific Bell Telephone Company (Pacific) and Verizon California, Inc. (Verizon) (filing jointly); AT&T Communications of California, Inc. (AT&T), WorldCom, Inc. (WorldCom) and XO California, Inc. (XO) (filing jointly); Calaveras Telephone Company, Cal-Ore Telephone Co., Ducor Telephone Company, Evans Telephone Company, Foresthill Telephone Co., Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Co., Pinnacles Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., The Siskiyou Telephone Company, The Volcano Telephone Company and Winterhaven Telephone Company (collectively the “Small LECs”) (filing jointly); Roseville Telephone Company (Roseville); the Office of Ratepayer Advocates (ORA) and The Utility Reform Network (TURN) (filing jointly); Cox California Telcom, L.L.C. (Cox); and CAIRS.

<sup>3</sup> The responding parties include: Pacific and Verizon (filing jointly); AT&T, WorldCom, and XO (filing jointly); Roseville; ORA and TURN (filing jointly); Cox; and CAIRS.

On April 9, 2002, CAIRS filed a “Motion [ ] to Include Preliminary Network Architecture Proposals in the Record” (Motion) with the proposals attached. On April 24, 2002, Pacific and Verizon responded to the Motion, stating that they did not oppose the Motion, but reserving the right to comment. We grant CAIRS’ unopposed motion to include its materials in our record but note that the preliminary network proposals are reference materials, not evidentiary materials.

On April 30, 2002, Commissioner Duque and ALJ Sullivan issued a “Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge” (Scoping Memo) affirming the classification of the proceeding as quasi-legislative and the preliminary determination that hearings were not necessary.<sup>4</sup> In addition, the Scoping Memo identified four major issues for resolution and adopted a procedural timetable for resolving the outstanding issues. Further, the Scoping Memo stated that CAIRS’ reference technical filing on network architecture could form a basis for a constructive workshop.

On May 29 and 30, 2002, the Commission conducted a workshop on 2-1-1 dialing to address the technical changes telephone companies must make in order to introduce 2-1-1 in California. On August 20, 2002, the Commission’s Telecommunications Division issued a “2-1-1 Dialing Workshop Report” (Workshop Report). Parties had an opportunity to file comments<sup>5</sup> and replies<sup>6</sup> on the Workshop Report.

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<sup>4</sup> The Scoping Memo and Ruling, however, declined to make a final determination that hearings were not necessary, and stated that a final determination required more information.

<sup>5</sup> Those parties filing comments include: Pacific and Verizon (filing jointly); AT&T; WorldCom; the Small LECs; Roseville; Cox; CAIRS; Allegiance Telecom of California,

*Footnote continued on next page*

Following Commissioner Duque's departure from office at the expiration of his term, this proceeding was reassigned to Commissioner Kennedy.

### **III. Background Information and Issues**

The impetus for introducing 2-1-1 dialing in California finds its genesis in the actions of the federal government and other states. On July 31, 2000, the FCC issued its *N11 Third Report and Order* assigning the 2-1-1 dialing code as a national abbreviated dialing code to be used for access to community I&R providers.<sup>7</sup> 2-1-1 dialing is currently in use in the States of Georgia, Connecticut, Florida, Idaho, Minnesota, Nebraska, North Dakota, Texas, Utah, and Wisconsin.

The FCC noted in its *N11 Third Report and Order* that the assignment of the 2-1-1 code to I&R providers satisfies the public interest standards for assignments of N11 codes, and recognizes that a great public need can be met through the implementation of a 2-1-1 dialing program. The use of the 2-1-1 dialing code has the potential to provide Californians with easy access to information concerning child care services, housing assistance, physical and mental health resources, aging and hospice services, educational and other programs. Such information is not currently available through the 9-1-1 emergency code or the 3-1-1 police non-emergency code.

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Inc. (Allegiance); the California Payphone Association (CPA); and Nexcare Collaborative (Nexcare), whose comments also included a petition to intervene.

<sup>6</sup> Those parties filing reply comments include: Pacific and Verizon (filing jointly); AT&T; Cox; and CAIRS.

<sup>7</sup> See, *N11 Third Report and Order*, Ordering Paragraph 52 (rel. July 31, 2001.) Currently, petitions for modification and clarification of the *N11 Third Report and Order* are pending before the Federal Communications Commission. They will not, however likely impact the program being adopted.

To determine whether and how to implement 2-1-1 dialing in California,

R.02-01-025 identified four issues:

- “1. What authority, if any, does the Commission have to implement 2-1-1 dialing and address nonconforming use of the 2-1-1 abbreviated dialing code?
- “2. Assuming such authority exists, are the proposed guidelines and application package attached hereto as Appendix A [of R.02-01-025] consistent with the public interest?
- “3. Should the Commission require all local exchange carriers [including competitive local exchange carriers but excluding wireless carriers] to tariff 2-1-1 service? What technical, operational, economic and administrative concerns provide a basis for exempting a local exchange carrier from a requirement to implement 2-1-1 dialing? Are there specific local exchange carriers regulated by this Commission that should be exempt from providing 2-1-1 dialing?
- “4. What rules and regulations should the Commission adopt to ensure 2-1-1 dialing is implemented for all Californians in furtherance of the public interest?”<sup>8</sup>

These form the central questions for resolution in this rulemaking.

In addition, the Scoping Memo expanded upon these questions, and identified six questions concerning the providers of the referral services and ten questions concerning what steps utilities would need to take to enable the publicly switched network to originate and terminate 2-1-1 calls.<sup>9</sup>

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<sup>8</sup> R.02-01-125, p. 7.

<sup>9</sup> Although we do not explicitly refer to these subsequent questions in this decision, they inform our discussion throughout.



#### **IV. What Authority, if Any, Does the Commission Have to Implement 2-1-1 Dialing and Address Nonconforming Use of the 2-1-1 Abbreviated Dialing Code?**

Since responsibility for the assignment of telephone numbers rests with the FCC, a central issue is whether the FCC has delegated sufficient authority to the states to implement such an abbreviated dialing code. Concerning this point, commenting parties provided detailed discussions tracing the sources of Commission authority to implement 2-1-1 dialing in California. Despite the detailed and diverse analyses, there was little dispute that the Commission has sufficient authority both to implement 2-1-1 dialing and to address nonconforming uses of the 2-1-1 dialing code in California.<sup>10</sup>

As is common on telecommunications issues, the Commission's authority to implement 2-1-1 dialing rests on federal authority delegated to states and on the Commission's own authority under state law.

The FCC delegated its authority within a broad policy framework of the public interest and with significant direction. The FCC assigned the 2-1-1 dialing code to I&R providers. The FCC first determined that this assignment of the 2-1-1 dialing code was in the public interest, stating:

a public need exists for an easy to use, easy to remember N11 code to efficiently bring community information and referral services to those who need them, providing a national safety network for persons to get access readily to assistance.<sup>11</sup>

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<sup>10</sup> AT&T and XO, in Comments on the Draft Decision, state that they "do not agree that the FCC has delegated sufficient authority for the Commission to handle 211 implementation and non-conforming uses. (p. 3)."

<sup>11</sup> *N11 Third Report and Order*, ¶ 19.

The FCC further noted that the “designation of a uniform national code would simplify access to information . . . to new members of communities as well as existing local citizens.”<sup>12</sup>

Concerning the role of the states, the FCC recognized the state efforts to implement 2-1-1 dialing,<sup>13</sup> and encouraged states to implement 2-1-1 similar to the programs in Georgia and Connecticut.<sup>14</sup> Furthermore, the FCC directed that “states will be allowed to continue to make local assignments that do not conflict with our national assignments.”<sup>15</sup>

In summary, the FCC played the role that it traditionally does concerning abbreviated dialing arrangements – designating a use that promotes the public interest and recognizing and approving state commission actions directing telephone companies to assign and administer certain N11 codes.<sup>16</sup> In particular, in its *N11 Third Report and Order*, the FCC declined to transfer N11 code assignments to the North American Numbering Plan Administrator, but instead stated that it would continue to designate and assign N11 codes,<sup>17</sup> even as it

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<sup>12</sup> *Id.*

<sup>13</sup> *Id.*, ¶ 17, n. 48.

<sup>14</sup> *Id.*, ¶ 21.

<sup>15</sup> *Id.*, ¶ 43.

<sup>16</sup> See *Id.* At ¶ 5, citing *In The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket 92-105, *First Report and Order and Further Notice of Proposed Rulemaking*, FCC 97-51, 12 FCC Rcd 5572 (1997) (“*N11 First Report and Order*”).

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

authorized state commissions to make local assignments of N11 codes that do not conflict with FCC national code assignments.<sup>18</sup>

There is, however, some uncertainty surrounding the lawfulness of the FCC's actions. The OIR noted that there are currently several petitions for modification or clarification before the FCC. Cox states that these petitions could invalidate the "FCC's delegation of its plenary authority to implement 2-1-1 dialing."<sup>19</sup> Nevertheless, Cox admits that "[t]he proper conclusion to be drawn is that the petitions for reconsideration of the *N11 Third Report and Order* do not present any legal impediment to the Commission proceeding with 2-1-1 implementation."<sup>20</sup> Cox urges that the Commission avoid ordering the expenditure of implementation costs by implementing 2-1-1 dialing at this time and recommends delaying any action "until the FCC has acted on the petitions for reconsideration."<sup>21</sup>

In addition to the authority delegated to the CPUC by the FCC, the CPUC has broad authority over all the carriers operating in California that will play any role in the implementation of 2-1-1 dialing in California. In particular, California Public Utilities Code § 701 provides that the Commission may do all things that are "necessary and convenient" in the supervision and regulation of public utilities. Pursuant to this broad state authority and the FCC's affirmation that the states will continue to perform number administration functions, including the

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<sup>18</sup> *Ibid.*

<sup>19</sup> Comments of Cox California Telecom, L.L.C. on the Implementation of 2-1-1 Dialing, February 22, 2002, p. 6.

<sup>20</sup> *Ibid.*

<sup>21</sup> *Ibid.*

local assignment of N11 codes, the California Commission possesses sufficient authority to implement 2-1-1 dialing.<sup>22</sup>

**V. Are the Proposed Guidelines and Application Package Attached as Appendix A of R.02-01-025 Consistent With the Public Interest?**

R.02-01-025, the rulemaking instituting this proceeding, proposed guidelines and an application package in Appendix A that I&R providers would need to complete before certification by the Commission that they are eligible to provide I&R services.

No carrier or consumer group voiced any objections to these proposed guidelines and application package. In particular Pacific and Verizon stated that they “generally agree with the guidelines proposed in Appendix A.”<sup>23</sup> AT&T, WorldCom and XO, on the other hand, take “no position on whether the proposed guidelines in Appendix A are consistent with the public interest.”<sup>24</sup> Similarly, the Small LECs<sup>25</sup> and Roseville,<sup>26</sup> take no position on this matter. ORA and TURN characterize the application and guidelines as “generally

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<sup>22</sup> This analysis is consistent with the comments of many filing parties, including Pacific and Verizon, Comments, p. 2; Small LECs, Comments, pp. 2-3; CAIRS, Comments, pp. 1-7; ORA and TURN, Comments, II. D.; Roseville, Comments, pp. 1-2. This analysis of state authority is also consistent with that presented by Cox, Comments, pp. 3-5, but we further note that Cox argues that if the FCC modifies its order, implementation costs ordered by this Commission could become stranded (Cox, Comments, p. 6).

<sup>23</sup> Pacific and Verizon, Comments, p. 6.

<sup>24</sup> AT&T, WorldCom and XO, Comments, p. 4.

<sup>25</sup> Small LECs, Comments, p. 3.

<sup>26</sup> Roseville, Opening Comments, p. 3.

acceptable.”<sup>27</sup> They note, however, that additional guidelines may prove necessary should more than one service provider apply for certification as an I&R provider in a particular area.

Cox voices “no objection” to the information sought in Attachment A. However, Cox argues for the selection of a single statewide service provider, and states that “the provider should be selected on its ability to provide statewide service . . .”<sup>28</sup> To support the selection of a single statewide provider, Cox argues that the Commission “should ensure that the 2-1-1 designated service provider have the necessary resources to provide operator-assisted referrals on 24-hour, seven-days-per-week basis statewide.”<sup>29</sup>

CAIRS sponsored the selection guidelines and application package in its original petition that led to the institution of this proceeding. CAIRS also provided the most extensive discussion of these materials:

The proposed guidelines and application provide an appropriate mechanism to ensure that the use of the 2-1-1 abbreviated dialing code occurs in an efficient manner in furtherance of the public interest. They require a potential 2-1-1 provider to demonstrate sufficient expertise and financial integrity to support 2-1-1 service at the county level. Furthermore, a potential 2-1-1 provider is required to make an Information and Referral Specialist available twenty-four hours a day at no cost to the calling party. A potential 2-1-1 provider needs to demonstrate adherence to professional standards, which generally reflect standards developed by the Alliance of Information and Referral Services (AIRS), the national professional membership organization of the information and referral service

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<sup>27</sup> ORA and TURN, Opening Comments, V.

<sup>28</sup> Cox, Opening Comments, p. 15.

<sup>29</sup> *Ibid.*

providers. These standards include (1) providing an acceptable level of service, including access to people with disabilities, (2) developing and maintaining health and human service databases, (3) developing service reports and measurement standards, and (4) developing and maintaining cooperative relationships with other I&R providers. Potential 2-1-1 providers should be able to demonstrate an understanding of these standards and agree to adhere to these standards in delivering 2-1-1 service. The proposed guidelines and application also require potential 2-1-1 providers to demonstrate a strong level of community support for its application to become a local 2-1-1 provider. Finally, the proposed guidelines and application permit collaborative relationships amongst potential 2-1-1 providers, which minimize the possibility that I&R providers will submit competing applications.<sup>30</sup>

Our own review of the application materials and criteria comport with the positive views of CAIRS and the parties in this proceeding. The application to provide 2-1-1 service is divided into four major sections. The first section elicits information on the organization, its structure, its background, and experience. The second section sets forth the required service conditions that a 2-1-1 service provider must meet. These include the minimum geographic scope of service, a prohibition on the acceptance of per referral fees from referred organizations or fees for inclusion in a referral database, the charge structure for callers, and the necessity of having live call takers 24 hours a day, seven days a week, and the steps taken to ensure accessibility to all, regardless of language or disability.

The third section requires that applicants comply with standards that conform to those established by AIRS for the delivery of I&R services. In addition, AIRS establishes standards for establishing and maintaining a database of service providers, for maintaining service in the event of a disaster, for

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<sup>30</sup> CAIRS, Comments, pp. 7-8.

collecting data and producing reports, and for establishing cooperative working relationships with others operating in the same service area.

In the fourth section, the application materials require that the 2-1-1 service provider demonstrate strong community support, including letters of support from groups serving particular needs. The list is generally comprehensive, but we note that it fails to solicit endorsements from veterans groups. Since there are a variety of governmental and community service organizations providing service to veterans, we have added veterans groups to the organizations eligible to provide endorsements.

We find that the standards and application procedures established for I&R providers do meet the public interest. These standards not only ensure the selection of qualified groups, but will also link California's I&R providers to a national professional community and establish procedures that will assist in maintaining and improving services. We thus plan to adopt the applications standards and forms contained in Appendix A of R.02-01-025 with the modification to accept endorsements from veterans groups. These are attached as Appendix A to this document.

**VI. Should the Commission Require All Local Exchange Carriers to Tariff 2-1-1 Service? And**

**What Rules and Regulations Should the Commission Adopt to Ensure That 2-1-1 Dialing Is Implemented for All Californians in Furtherance of the Public Interest?**

The purpose of the third and fourth questions proposed in R.02-01-025 concerning 2-1-1 tariffing and regulation was to examine those technical issues affecting the design of the telecommunications network, the routing of calls, and the interconnection of the different public carriers that have implications for who can and should implement the 2-1-1 service. The Scoping Memo expanded upon

these two questions, and posed additional specific questions concerning the telecommunications networks and the steps needed to implement 2-1-1 dialing. The questions of the Scoping Memo became the subject of the technical workshop, the Workshop Report,<sup>31</sup> and the comments and replies by the parties to this proceeding. Resolving the issues contained in these questions will permit implementation of 2-1-1 dialing in California. We therefore turn our attention to the Workshop Report and the responses of parties to it.

### **A. Workshop Report**

The workshop “addressed the technical changes telephone companies must make, and how to effect those changes, in order to introduce 2-1-1 in the state.”<sup>32</sup> The Workshop Report makes recommendations in seven different areas:

1. Each I&R provider should serve the area of an entire county or form consortia to serve multiple counties.
2. A network architecture in which 2-1-1 dialing directs a call to a single “800” (or 8YY) number appears to be simpler and faster to implement than other options. Nevertheless, the Workshop Report recommends that the Commission not mandate a particular routing option since it is unclear whether another option would prove less expensive in the long term.
3. 2-1-1 calls should be able to terminate either at a county I&R provider or at a Regional Technical Center (RTC), which would then complete the routing of the call to a specific I&R provider.

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<sup>31</sup> California Public Utilities Commission, Telecommunications Division, *2-1-1 Dialing Workshop Report*, August 20, 2002 (Workshop Report).

<sup>32</sup> Workshop Report, p. 1.



4. Universal availability of 2-1-1 service will require switch translations to ensure the proper routing of calls originating on a local network.
5. The Commission should allow LECs [both ILECs and CLCs] to recover their costs for switch translation services. Recovery of switch translation costs for wireless carriers is beyond the scope of this proceeding.
6. The Commission should not set deadlines for 2-1-1 implementation, but should require periodic status reports.
7. The Commission should immediately order payphone providers to desist from utilizing 2-1-1 as the number for customers to call for refunds because this use is incompatible with the new 2-1-1 services.<sup>33</sup>

Although the Workshop Report did not recommend that the Commission mandate the use of a particular network design, a large portion of the Workshop Report explored four different network designs for implementing 2-1-1 dialing in California. These include: 1) the routing of all 2-1-1 calls to a single 8YY number, with subsequent routing to a County I&R; 2) the routing of all calls to a single 8YY number, with subsequent routing to a Regional Technical Center (RTC) for subsequent telecommunications services and further routing; 3) variable routing, either through handoff to a “local” number or handoff to an 8YY number depending on the call’s origin and location of an RTC; and 4) variable routing, either through handoff to a “local” number or handoff to an 8YY number, depending on the calls origin and location of the County I&R.

The analysis in the Workshop Report reached several favorable conclusions concerning options that use 8YY routing. The Workshop Report notes that “[r]epresentatives of all carrier types at the workshop (ILEC, CLEC,

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<sup>33</sup> *Id.*, pp. 2-3.

IEC) expressed their preferences for a network architecture in which 2-1-1 calls are translated and routed to an 8YY number; several carriers stated that the fewer the ‘point to’ numbers used, the simpler and better they can implement this.”<sup>34</sup> The Workshop Report also notes that carriers stated that the use of a single “point to” number permits a simpler and less costly implementation of 2-1-1 dialing. The Workshop Report also observes that a simple implementation of a single “point to” number would eliminate the need for a statewide “database” and complex policies controlling access to the database. Moreover, with the implementation of 2-1-1 dialing as a form of 800 service, then 2-1-1 service will likely consist almost entirely of the repackaging of existing telecommunications services. In particular, the Workshop Report notes that “[s]witch translation in itself is not a new service, although the use of the 2-1-1 number will be new.”<sup>35</sup>

On the other hand, the Workshop Report notes that CAIRS supported the variable routing solution because it felt that it would lead to lower costs and noted that “many calls that people dial today to I&R providers are local calls and are free to the caller as well as to the I&R provider.”<sup>36</sup> Moreover, the Workshop Report, as mentioned earlier, recommends that the Commission not mandate a particular network design, but give the referral agencies and the utilities the freedom to determine what alternative best serves their needs.

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<sup>34</sup> Workshop Report, pp. 15-16. Fewer “point to” numbers obviate the need for elaborate tables in the switches memory, and thereby reduce programming, maintenance, and call processing costs.

<sup>35</sup> *Id.*, p. 20.

<sup>36</sup> Workshop Report, p. 16.

The Workshop Report also identified several nonconforming uses of 2-1-1 dialing. The Workshop Report states that participants noted that 2-1-1 is “currently used by some payphone providers for refund purposes”<sup>37</sup> and would need to be discontinued to permit callers using payphones to reach the social services relying on 2-1-1 calling. In addition, the Workshop Report notes that Cox reported “that the wireless industry has petitioned the FCC to use 2-1-1 for wireless information.”<sup>38</sup> Unlike the payphone situation, there is no FCC mandate for eliminating this use of 2-1-1 by wireless carriers at this time, and the Scoping Memo limited the scope of this proceeding to wireline carriers. The Workshop Report recommends that the Commission “proceed toward implementation of 2-1-1 by wireline carriers for I&R purposes, to conform with the federal mandate that 2-1-1 is reserved for I&R service provision.”<sup>39</sup>

Regarding a timetable for implementing 2-1-1 dialing, the Workshop Report recommends that the Commission avoid setting deadlines for the start of 2-1-1 services but instead rely on a series of milestones to insure progress. In particular, the report notes that it is unlikely that 2-1-1 service will have a simultaneous statewide rollout. Instead, consistent with the presentation of CAIRS, the Workshop Report anticipates that individual I&R providers will drive implementation as they make their own plans for service rollout. Because of the likely rollout of services at different times throughout the state, the Workshop Report recommends that the CPUC “actively monitor 2-1-1

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<sup>37</sup> Workshop Report, p. 16.

<sup>38</sup> *Ibid.*

<sup>39</sup> *Ibid.*

implementation by requiring periodic status reports and establishing milestones for implementation.<sup>40</sup>

In addition to the questions posed for the Workshop in the Scoping Memo, the Workshop Report noted:

- that customer education would prove necessary as the service was deployed,
- that the participants felt that the call should be free to the calling party, and
- that calls from payphones raised complex issues concerning routing and cost recovery.

The Workshop Report, however, did not make any further recommendations concerning these matters.

#### **B. Comments and Replies on Workshop Report**

The Workshop Report elicited comments from Pacific and Verizon (which filed jointly), Roseville, CAIRS, WorldCom, Allegiance Telecom, California Payphone Association, the Small LECs, AT&T, Cox, and Nexcare Collaborative (Nexcare), which also filed a motion to intervene. Pacific and Verizon (filing jointly), CAIRS, AT&T, and Cox also filed reply comments.

Pacific and Verizon note that “routing calls by county is technically unfeasible given the companies’ current database and network architecture systems.”<sup>41</sup> In addition, they note that, contrary to assumptions in the Workshop Report, a LEC can handle an 8YY call that originates and terminates in the same LATA. In reply comments, they recommend that the Commission should “not

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<sup>40</sup> Workshop Report, p. 21.

<sup>41</sup> Pacific and Verizon, Workshop Opening Comments, p. 1.

mandate how 2-1-1 calls are routed;”<sup>42</sup> that the Commission coordinate the deployment of 2-1-1 service with the schedule to eliminate 2-1-1/repair dialing for payphones; and that the Commission “not require carriers to file their costs with ‘stakeholders,’ such as consumer groups and information and referral providers.”<sup>43</sup> Finally, we note that in opening comments on the rulemaking, Pacific and Verizon requested that the Commission permit the carriers to have flexibility in the design of the 2-1-1 service and the decision of whether to offer it via a tariff, via a tariff developed on an Individual Case Basis, or via contract.<sup>44</sup>

Roseville supports the Workshop Report’s recommendation that the Commission “not mandate a particular architecture for implementation of 2-1-1 dialing.”<sup>45</sup>

The Small LECs note that their small number of switches would cause the cost to develop a tariff based on a cost study to exceed the potential revenues that the service will generate. They request that the Commission allow small carriers “to concur in any switch translation tariff rate that has been approved for another carrier.”<sup>46</sup>

AT&T states that the Workshop reached agreement on key issues, including: that carriers should be able to recover all costs for 2-1-1

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<sup>42</sup> Pacific and Verizon, Workshop Reply Comments, p. 1.

<sup>43</sup> *Ibid.*

<sup>44</sup> Comments of Pacific Bell Telephone Company and Verizon California, Inc. In Response to Order Instituting Rulemaking to Implement 2-1-1 Dialing in California, February 22, 2002, p. 4.

<sup>45</sup> Roseville, Workshop Opening Comments, p. 1.

<sup>46</sup> Small LECs, Workshop Opening Comments, p. 2.

implementation from I&R providers; that the Commission should not mandate 2-1-1 termination service – i.e., the requirement that a carrier terminate I&R calls to any I&R that requires it; that the Commission set milestones, not deadlines, for implementation of 2-1-1; that the Commission not select a single I&R provider to serve the entire state; that telephone local service areas do not overlap and do not generally follow county lines; and that calls should be routed by NPA-NXX protocols.<sup>47</sup> AT&T also asks the Commission to order an all 8YY approach to implement 2-1-1 dialing in California since that approach minimizes switch translation tasks and avoids complicated issues concerning reciprocal compensation agreements between local carriers and provides a simple means to compensate payphone providers. In addition, AT&T stated that “[c]arriers agreed that such an order [to require all LECs to offer 2-1-1 service to their end-users] is unnecessary and may present regulatory complications.”<sup>48</sup>

Cox laments the lack of information on traffic flows and volumes that would be needed to evaluate the different methods for structuring a 2-1-1 service product. Cox argues that “until the Commission convenes another workshop whereby the interested I&R parties provide actual documentation of demand and traffic projections so that the service architecture costing and pricing can be known, a single statewide 8YY number for 2-1-1 dialing is the only reasonable implementation strategy.”<sup>49</sup> Cox also reiterates its support for a single statewide I&R provider, which it claims would offer both cost and service advantages.

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<sup>47</sup> AT&T, Workshop Opening Comments, pp. 3-4.

<sup>48</sup> *Id.*, p. 11.

<sup>49</sup> Cox, Workshop Opening Comments, p. 3.

Finally, in commenting on the Workshop Report, Cox claims that it “failed to acknowledge Cox’s position” and “overlooked the value of all these benefits.”<sup>50</sup>

In Reply Comments, Cox says that parties generally agree that “the technical efficiency of a single 8YY translation will result in quicker implementation of 2-1-1 services statewide and in lower carrier costs.”<sup>51</sup> Cox argues that permitting variable routing would enable a carrier “to entirely subvert the 2-1-1 implementation process”<sup>52</sup> and argues that 8YY calling is the “most cost efficient and easily implemented solution presented at the Workshop.”<sup>53</sup> Finally, Cox points out that the Commission has not required competitive local exchange carriers to submit cost data and that the use of 8YY calling solves cost issues because it is an existing tariffed service.

WorldCom compliments the Workshop Report as “thorough and balanced”<sup>54</sup> and proceeds to comment on the Report’s findings and recommendations. WorldCom agrees that I&R providers should serve “a geographic area delimited by county boundaries and no less than an entire county.”<sup>55</sup> WorldCom views the recommendation that the Commission should not mandate how to implement 2-1-1 dialing in California as a practical compromise, although WorldCom “strongly supports the TD’s judgment that an

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<sup>50</sup> *Id.*, p. 4.

<sup>51</sup> Cox , Workshop Reply Comments, p. 2.

<sup>52</sup> *Id.*, p. 3.

<sup>53</sup> *Id.*, p. 4.

<sup>54</sup> WorldCom, Workshop Opening Comments, p. 1.

<sup>55</sup> *Ibid.*

all 8YY routing solution is the fastest and simplest to implement.”<sup>56</sup> WorldCom supports the recommendation that the Commission refrain from mandating whether 2-1-1 calls should terminate at an I&R provider or at an RTC.

Concerning the provision of 2-1-1 origination service, WorldCom notes that the FCC has “already issued a regulatory mandate for 2-1-1 service”<sup>57</sup> and observes that “the FCC made the duty to provide 2-1-1 call origination dependent on the request for service from the information and referral provider.”<sup>58</sup> WorldCom also observes that “2-1-1 service will not be universally available unless that Commission mandates that all LECs and payphones provide 2-1-1 origination service.”<sup>59</sup> WorldCom also agrees with the recommendation that LECs be permitted to recover their switch translation costs, that the Commission not set deadlines for implementing 2-1-1 statewide and that the Commission should order payphone providers to “desist for using 2-1-1 as the number to call for refunds.”<sup>60</sup>

Allegiance notes that it provisions non-mandated N11 service in other states and “many counties exercise their option not to participate in the N11 service.”<sup>61</sup> Allegiance states that it “is reasonable and prudent to provision 2-1-1 abbreviated dialing by programming switches to “point to” an 8YY County I&R

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<sup>56</sup> *Ibid.*

<sup>57</sup> *Id.*, p. 3.

<sup>58</sup> *Ibid.*

<sup>59</sup> *Ibid.*

<sup>60</sup> *Id.*, p. 5.

<sup>61</sup> Allegiance, Workshop Opening Comments, p. 2.



Provider or “point to” an all-service 8YY.”<sup>62</sup> Allegiance argues that variable routing “has many cost and technical limitations”<sup>63</sup> and therefore Allegiance does not support such an alternative. Allegiance further states that there is no reason to select a single I&R provider to serve the entire state, and observes that the county is the natural dividing line for the provision of 2-1-1 service. Finally, Allegiance supports voluntary provision of 2-1-1 service, and an implementation approach that relies on milestones, rather than regulatory deadlines.

The California Payphone Association (CPA) opposes the Workshop Report’s recommendation that the Commission “immediately order payphone providers to desist from utilizing 2-1-1 as the number for customers to call for refunds.”<sup>64</sup> CPA also argues the “FCC has not mandated immediate abandonment of non-conforming uses of the 2-1-1 code, but instead has provided for gradual conversion . . .”<sup>65</sup> Furthermore, CPA argues that the Workshop Report’s recommendation to eliminate “charges to payphone users for 2-1-1 calls must not be acted on without due consideration of the complex issues it entails.”<sup>66</sup> Finally, CPA states that if the Commission plans to impose rules on payphone providers, then CPA requests evidentiary hearings.

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<sup>62</sup> *Id.*, p. 3.

<sup>63</sup> *Id.*, p. 5.

<sup>64</sup> Workshop Report, p. 3.

<sup>65</sup> CPA, Workshop Opening Comments, p. 4. CPA also provides several citations to the FCC’s *Third Report and Order* as part of its comments opposing the immediate abandonment of nonconforming 2-1-1 uses.

<sup>66</sup> *Ibid.*

Nexcare provided information to the Commission concerning alternative models for providing referral services to callers. In particular, Nexcare noted that there are economies of scale in referral services, and that there are efficiencies in linking telephone based referral services to Internet referral services. Nexcare suggests “that it is possible that some categories of referral might be better handled on a state-wide basis, while others might be better handled on a regional or county-by-county basis.”<sup>67</sup>

CAIRS supports the Workshop Report as “accurately reflecting the dialogue between parties . . . ”<sup>68</sup> CAIRS, however, uses its comments to suggest refinements to the recommendations of the Workshop Report. CAIRS, for example, supports the Workshop Report’s recognition “that information and referral services have historically been provided at the county level,”<sup>69</sup> but recommends that the Commission accept collaborative efforts of different I&R providers to bring 2-1-1 service to a county. CAIRS also asks that the Commission “scrutinize underlying cost data in order to keep switch translation and related charges just and reasonable.”<sup>70</sup>

CAIRS also urges that the Commission recognize the complexities of implementing 2-1-1 service, and urges that the Commission “anticipate the procedural steps and timelines necessary to evaluate 2-1-1 applications.”<sup>71</sup> This

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<sup>67</sup> Nexcare, Workshop Opening Comments, p. 6.

<sup>68</sup> CAIRS, Workshop Opening Comments, p. 2.

<sup>69</sup> *Ibid.*

<sup>70</sup> *Id.*, p. 3.

<sup>71</sup> CAIRS, Workshop Opening Comments, p. 3.

implies that we should allow Commission staff several months to review applications. Further, CAIRS states that the costs of implementing a “point to number translation are transparent to the characteristics of the point to number.”<sup>72</sup> As a consequence, CAIRS believes that carriers can develop tariffs/costs for number translations without the need of a routing plan from CAIRS. CAIRS further distinguishes between call termination services, which are available already via tariff or contract, and 2-1-1 switch translations, for which there are no current tariffs.

In its Reply Comments, CAIRS urges that the Commission “initiate implementation efforts to fulfill the FCC’s mandate.”<sup>73</sup> CAIRS observes that although routing calls along county lines with 100% accuracy may be technically infeasible, it is possible to route calls along county lines with a high degree of accuracy and points out that I&R agencies have developed “cooperative arrangements” for “handling misdirected calls.”<sup>74</sup> Thus, attempting to route calls along county lines makes sense as long as I&R providers develop procedures for handling calls that will necessarily be misdirected. CAIRS further notes that the Workshop explored multiple ways of routing 2-1-1 calls, and recommends that the Commission not mandate a single solution. Finally, CAIRS notes that although Pacific and Verizon have not provided information on switch translation costs to the Commission, several states have already implemented this service and developed either tariffs or contract prices, and recommends that

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<sup>72</sup> *Id.*, p. 4.

<sup>73</sup> CAIRS, Workshop Reply Comments, p. 2.

<sup>74</sup> *Id.*, p. 4.

“[a]t a minimum, the Commission should obtain this cost information from Pacific and Verizon.”<sup>75</sup>

**C. Discussion: Permit I&R Providers to Implement 2-1-1 Calling Flexibly With ILECs; Set Implementation Steps to Permit Sequential Rollout of 2-1-1 Service**

To implement 2-1-1 calling in California, it is necessary to resolve those issues that arise from the technology of the telecommunications networks and the issues that arise in routing the call. In California, 2-1-1 calls can originate on the phones served by incumbent LECs (ILECs), by competitive local carriers (CLCs) on facilities leased from ILECs, by CLCs using their own lines, by “smart” payphones housing small computers, or by “dumb” payphones using ILEC services.<sup>76</sup>

For all calls placed to 2-1-1 service providers, the initial switch receiving the call (or intelligent payphone) will determine how to route it. The Workshop Report identified two different situations: either the switch will deliver all calls to an 800 number and the carrier who owns it for transport and termination (the 8YY solution) or the switch will determine whether the destination point is local and handle the call, or whether the destination point is not local, and then deliver the call to an 800 number for further transport and eventual termination (the variable routing solution). In no case, however, will it be possible to route calls strictly by county because a LECs central office frequently provides telecommunications services that straddle a county’s boundaries.

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<sup>75</sup> *Id.*, p. 8.

<sup>76</sup> Note that the scope of this proceeding does not include the routing of 2-1-1 calls made by wireless providers of telephone services.

A switch can translate a 2-1-1 call to an 800 number or to a local number, but not both. Concerning this choice of routing, 8YY versus variable, we see no reason why the Commission should make a blanket order mandating a particular implementation plan for 2-1-1 call origination service. Although many parties have pointed out the simplicity of an 8YY solution, CAIRS stated that information and referral providers are willing to pay for the implementation of 2-1-1 dialing using a variable routing alternative. Moreover, Verizon and Pacific, the incumbent LECs whose switches will provide service to most callers, have asked the Commission to not mandate a specific program for implementing 2-1-1 dialing. For this reason, we will leave it up to these ILECs and CAIRS to develop their own program for implementing 2-1-1 call origination service on their networks.

There is no evidence in this record that would indicate that there would be a cost difference for switch translations under either an 8YY or a variable routing solution. Concerning the costs of implementing 2-1-1 service, we note that although CAIRS has repeatedly stated that information and referral providers are willing to pay reasonable costs, it has also stated that “it is critical to obtain information from carriers regarding the costs.”<sup>77</sup> We note that there are Commission procedures in place that require ILECs to provide cost support information for tariffed services, whether the tariff is a standing offer or an Individual Case Basis (ICB) tariff offering. If such information is competitively sensitive, the filing party may seek a protection order. Under this procedure, the cost information will be submitted to the Commission for review by the Telecommunications Division, and to parties executing non-disclosure

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<sup>77</sup> CAIRS, Workshop Reply Comments, p. 8.

agreements. This procedure offers the ILECs protection of this sensitive information while preserving the rights of customers to protest unreasonable rates.

We will permit local exchange carriers other than Pacific or Verizon to concur with the tariffs of either Pacific or Verizon. As the Small LECs point out, their small number of switches would make the cost of developing cost-based rates higher than the revenues that they could reasonably expect to receive from this service. Any of the Small Incumbent LECs, however, will have the opportunity to provide their own cost data and a proposed price for the switch translation services should they find Pacific's and Verizon's prices unacceptable. Consistent with this Commission's prior decisions, CLCs may propose their own prices and will not be required to submit cost data to support their 2-1-1 switch translation services unless they are directly challenged as unreasonable or the Commission undertakes such an inquiry on its own motion.

We note that the ILECs' switches serve all customers of the ILECs and those customers receiving service from CLCs who provision their lines with facilities leased from ILECs. Thus, the offering of 2-1-1 origination service by Pacific and Verizon will provide coverage to a very large number of California access lines.

Concerning the responsibility of other CLCs for 2-1-1 services, we note that although some parties ask us to not mandate that all LECs provide 2-1-1 origination service, WorldCom has accurately noted that the FCC has already issued a regulatory mandate for 2-1-1 origination service upon request from an entity to use 211 for I&R purposes. Thus, as part of our implementation of 2-1-1 service, we will require all LECs to provide 2-1-1 origination service when they provide service in areas where 2-1-1 service will be implemented. All calls should be routed to their destination, and we cannot envision a legitimate

regulatory policy that would permit the non-completion of 2-1-1 calls simply because they were made by customers not served by an ILEC. Moreover, we note that CAIRS expects to pay the reasonable costs of programming switches to provide this service, whether incurred by CLCs or ILECs.

Although we have declined to order a specific method for implementing 2-1-1 origination service by ILECs, we note that Cox and AT&T have made important points concerning the ease of implementing an 8YY solution. In addition, Cox notes that the FCC has not resolved the petitions for reconsideration and cautions against ordering an expensive implementation alternative for providing 2-1-1 service. We further note that virtually any implementation of 2-1-1 will require some use of an 8YY service to transport and terminate some calls. To make this inexpensive implementation alternative available, we require that CAIRS or any group providing a 2-1-1 routing or information service ensure that there is at least one 8YY number available that these carriers can use to route calls. We will permit wireline carriers other than Pacific and Verizon to route all 2-1-1 calls to an 8YY number. Upon the FCC's final resolution of pending matters, the Commission will entertain a "Petition to Modify" our decision granting CLECs permission to route all calls to an 8YY number.

We also note that CPA has raised numerous issues concerning compensation for the use of payphones by those dialing for 2-1-1 service. At the same time, CAIRS argues that all calls should be free to those dialing the 2-1-1 number. For those "smart" payphones that contain computers that can translate a 2-1-1 number to another number, redirecting the call to an 8YY service can enable the payphones to complete the call with no charge to the calling party while permitting the payphone operator to receive payment from the 8YY carrier consistent with the FCC's rules concerning these calls. We believe that this

ensures fair compensation to the payphone providers and reliable service to Californians.

For other 2-1-1 calls, CPA argues that there is no basis for California to make these calls free. CPA notes that Section 276(b)(1)(A) of the 1996 Telecommunication Act states that:

. . . the Commission shall take all action necessary to prescribe regulations that establish a per call compensation plan to ensure that all payphone service providers are fairly compensated for each and every completed intrastate and interstate call using their payphone.

CPA further notes that:

While remanding certain other aspects of the FCC's orders on other grounds, the Court of Appeals held that "the statute unambiguously grants the [FCC] authority to regulate rates for local coin calls," and gives the FCC "an express mandate to preempt State regulation of local coin calls."<sup>78</sup>

In reply, CAIRS notes that this Commission has facilitated 8YY call routing and states that it believes that "the FCC has provided the CPUC with sufficient authority to implement 2-1-1 and address nonconforming use, including requiring the availability of 2-1-1 dialing from payphones without the need for a coin drop."<sup>79</sup> In particular, it is important to note that no pay phone should be able to collect compensation for treating 2-1-1 calling as an 8YY call and again as a local call.

For other payphones lacking the ability to translate a number, we permit the payphone providers to make whatever arrangements they deem

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<sup>78</sup> CPA, Opening Comments, pp. 4-5.

<sup>79</sup> CAIRS, Reply Comments, p. 2.



necessary to have the 2-1-1 call treated as an 8YY call for compensation purposes. However, absent FCC clarification of the appropriate charge for 2-1-1 calls dialed from a payphone, we do not set a charge for these calls.

From the information provided by CAIRS in this proceeding, it is clear that there are no plans to make a flash-cut implementation of 2-1-1 calling statewide. Indeed, CAIRS projects a phased rollout of 2-1-1 service in California.<sup>80</sup> Among other things, the rollout depends on the identification by CAIRS and approval by the Commission of an organization that will become the 2-1-1 service designee for the county. We envision that CAIRS and/or the 2-1-1 service provider or an integrated group of 2-1-1 service providers in a particular area will submit a formal letter to the Executive Director of the Commission consistent with the Service Provider Application package shown in Appendix A to this Decision, for review and certification of the I&R provider(s) and a service rollout plan. The Commission's staff will place a notice in the Commission's Daily Calendar and will review the letter and supporting materials. 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.

Simultaneous with this submission, the ILECs serving the areas over which 2-1-1 service is proposed shall submit to the Commission a tariff, an ICB tariff, or a contract to provide the switch translation services that the 2-1-1 service will require via an advice letter. The Commission's advice letter procedures provide public notice of the plans for rolling out 2-1-1 service in an area and

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<sup>80</sup> CAIRS, Opening Comments, Exhibit A.

affords an opportunity for the Commission to determine that prices are reasonable.

Concerning the timing for implementing 2-1-1 service, we decline to set deadlines for the review of the letters requesting certification of I&R providers and the commencement of 2-1-1 service. We will instead set a combination of milestones and deadlines for the implementation of 2-1-1 calling.<sup>81</sup> 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>82</sup>

In addition, we will set a deadline of four months following the filing of a 2-1-1 proposal by an I&R provider for receiving from the affected ILECs an advice letter proposal for providing 2-1-1 call origination service covering the specific area over which the 2-1-1 service will be implemented.<sup>83</sup> The review of the price and cost of 2-1-1 service should have a milestone of Commission action within six months of the tariff filing with immediate effectiveness. In other words, incumbent local exchange carriers should be able to implement 2-1-1 origination services no later than six months after filing. We anticipate that once an ILEC has obtained approval of a tariff or contract to provide 2-1-1 origination service, subsequent advice letters submitted by that ILEC may be approved on an expedited basis. Incumbent local exchange carriers other than Pacific or

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<sup>81</sup> A milestone sets a goal for a Commission required action; a deadline creates a legal obligation for action.

<sup>82</sup> This review process is subject to the review standards adopted herein.

<sup>83</sup> This advice letter is subject to General Order 96-a process.

Verizon may offer 2-1-1 origination service at Pacific's or Verizon's rates without providing cost data and may follow Pacific's or Verizon's filings by 30 days.

Furthermore, we will set a deadline for each payphone provider to discontinue nonconforming uses of the 2-1-1 number from payphones in those affected geographic areas when 2-1-1 service will be offered. The payphone providers should also ensure that their payphones can handle 2-1-1 calls when dialed by those seeking information and referral services.

Similarly, CLCs providing service in an area affected by a 2-1-1 service proposal shall file an advice letter setting forth the carrier's 2-1-1 charges within 30 days of the ILECs filing of a proposed tariff to provide 2-1-1 service.<sup>84</sup> The CLCs should be able to offer 2-1-1 origination service simultaneous with the offering of this service by ILECs, or approximately five months following their filing. The CLCs may use 8YY calling to implement 2-1-1 origination service. To make this inexpensive implementation alternative available, we require that CAIRS or any group providing a 2-1-1 routing or information service ensure that there is at least one 8YY number available that these carriers can use to route calls. Pending final resolution of matters by the FCC, we will permit facilities-based wireline carriers other than Pacific and Verizon to route all 2-1-1 calls to an 8YY number.

As a result of these deadlines and milestones, we anticipate that all the Commission approvals and network changes needed to provide 2-1-1 origination and I&R services should be in place ten months after the initial filing by an I&R provider. If for some reason the I&R provider proves incapable of implementing 2-1-1 service within a year of the Commission's approval of the 2-1-1 providers

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<sup>84</sup> This advice letter is subject to the General Order 96-a process.

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and the needed tariffs, then the Commission's approval should lapse so that other potential I&R providers can offer services in this area.

In summary, the milestones and deadlines look as follows:

Event	Milestone or Deadline	Action
1	Day 0	Filing of Letter with Executive Director of the Commission seeking approval of 2-1-1 implementation proposal and specific I&R providers. <sup>85</sup> This letter should be served on ILECs, as appropriate.
2	Deadline Event 1 plus 120 days	Pacific and Verizon's Proposals to regarding 2-1-1 origination services. Payphone Telephones initiate process to relinquish use of 2-1-1 service for access to refund and repair service.
3	Deadline: Day 150 or Event 2 plus 30 days	Other ILEC proposals for 2-1-1 origination services.
3	Deadline: Day 150 or Event 2 plus 30 days	CLC Proposal to offer 2-1-1 Origination Services via 8YY"point to" methods.
4	Milestone: Day 180 or Event 1 plus 180 days	Commission approval of Resolution designating I&R providers to provide services to those calling 2-1-1.
5	Milestone: Day 300 or Event 2 plus 180 days <sup>86</sup>	Commission approval of all advice letters for 2-1-1 origination.
6	Milestone: Day 300 or Latest of events 4 and 5	The commencement of the rollout of 2-1-1 services (contingent upon Commission approvals) to be completed in 60 days.
7	Deadline: Day of Event 6 +360 Days	If no rollout of 2-1-1 services occurs by this date, then I&R providers will forfeit their certification to provide 2-1-1 service in the affected areas

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<sup>85</sup> We expect carriers will provide network information to I & R providers as such information is necessary to develop a 2-1-1 implementation proposal (e.g. number of switches which would require translation in a specific 2-1-1 service area).

<sup>86</sup> As noted above, we anticipate that once an ILEC has obtained approval of a tariff or contract to provide 2-1-1 origination service, subsequent advice letters submitted by that ILEC may be approved on an expedited basis.

This set of milestones and deadlines should provide the guidance that the affected parties require to assure a timely implementation of 2-1-1 dialing in California.

## **VII. Comments on Draft Decision**

The draft decision of Commissioner Henry Duque was mailed to the parties in accordance with Pub. Util. Code § 311(g)(1) and Rule 77.7 of the Rules of Practice and Procedure. Opening comments were filed on January 16, 2003 by CAIRS, Verizon and SBC-West (filing jointly), Cox, WorldCom, AT&T and XO (filing jointly), Roseville, the Small LECs, and CPA. Reply comments were filed on January 21, 2003 by CAIRS, Verizon and SBC-West (filing jointly), Cox, WorldCom, AT&T and XO (filing jointly), Roseville, the Small LECs and CPA.

CAIRS comments requested clarification of numerous sections of the draft decision, and we have incorporated these comments as appropriate.

Verizon and SBC-West ask that we permit them to route “all calls, including calls from payphones, to 8YY (1-800) numbers.”<sup>87</sup> Concerning this first issue, throughout this entire proceeding Verizon and SBC-West have asked that the Commission not mandate a form of call routing in the provision of 2-1-1 service. In response to this prior request, we have elected to leave this matter to their negotiations with their customers. In comments on the draft decision, however, Verizon and Pacific bring up a new issue, -- the inability of their switches to route calls from “dumb” payphones to 8YY numbers. At this point they ask that we therefore permit them to route all calls as 8YY calls. We decline to grant this request, but instead trust that they will prove capable of resolving this matter with their customers.

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<sup>87</sup> Verizon and SBC-West, Opening Comments, p. 1.

Verizon and SBC-West ask that we clarify that they “need not file their costs with ‘stakeholders,’ such as consumer groups.”<sup>88</sup> Verizon and SBC-West must file their arrangements to provide 2-1-1 call translation services with this Commission in a standard advice letter process. Consistent with that process, they need not provide cost data to their customers or consumer groups as discussed in the Workshop Report. Instead, following standard Commission procedures, such cost information will be provided only to those who execute non-disclosure agreements with these carriers. Disputes concerning access to this data can be resolved by the Commission’s Law and Motion Administrative Law Judge.

Verizon and SBC-West provide detailed comments on the milestones, requesting that we delay their advice letter filings until after the Commission has approved specific I&R providers. As an alternate, they request more time and that the Commission require the I&R providers to serve their application letters on Verizon and SBC-West, as appropriate. We have made these changes, granting an additional 30 days before requiring the ILECs to file their advice letters and requiring the I&R providers to serve their letters requesting 2-1-1 authorization on all parties in this proceeding.

Cox identifies certain conclusions of law that are unneeded or which conflict with past Commission precedent. Similarly, WorldCom asks for clarification of certain points and greater specificity in certain conclusions. AT&T and XO, filing jointly, requested modifications. We have incorporated these suggestions as appropriate.

The Small LECs and Roseville filed supportive comments.

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<sup>88</sup> Verizon and SBC-West, Opening Comments, p. 1.

We have read the comments and replies of all parties. In addition to the changes specifically discussed, we have made numerous changes, as appropriate.

### **VIII. Assignment of Proceeding**

Susan P. Kennedy is the Assigned Commissioner and Timothy J. Sullivan is the assigned ALJ in this proceeding.

### **Findings of Fact**

1. The FCC's *Third Report and Order and Order for Reconsideration*, FCC 00-256, *In the Matter of the Petition by the United States Department of Transportation for Assignment of an Abbreviated dialing Code (N11) to Access Intelligent Transportation Systems (ITS) Services Nationwide*, NSD-L-24; *In the Matter of the Request by the Alliance of Information and Referral Systems, United Way of America, United Way 2-1-1 (Atlanta, Georgia), United Way of Connecticut, Florida Alliance of Information and Referral Services, Inc. and Texas I&R Network for Assignment of 2-1-1 Dialing Code*, NSD-L-98-80; and *in the Matter of the Us of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket 92-104, released July 31, 2000 ("*N11 Third Report and Order*"), assigned the 2-1-1 dialing code to I&R providers.

2. The FCC's *N11 Third Report and Order* allows states to continue to make local assignments that do not conflict with national assignments.

3. The FCC's *N11 Third Report and Order* requires that all carriers discontinue the use of 2-1-1 dialing that is incompatible with the new 2-1-1 dialing service.

4. The FCC's *N11 Third Report and Order* requires that all carriers provide 2-1-1 origination services in a service area in which 2-1-1 abbreviated dialing has been implemented at the request of an entity seeking to use 2-1-1 for Information and Referral Services. The use of the 2-1-1 dialing code has the potential to provide Californians with easy access to information concerning child care services, housing assistance, physical and mental health resources, aging and hospice services, educational and other programs.



5. California Public Utilities Code § 701 provides that the Commission may do all things that are “necessary and convenient” in the supervision and regulation of public utilities. Such information is not currently available through the 9-1-1 emergency code or the 3-1-1 police non-emergency code.

6. Pursuant to the FCC’s Third Report and Order and pursuant to the Commission’s broad authority to regulate public utilities, the Commission has determined that it will implement 2-1-1 dialing in California.

7. The standards and application procedures established for I&R providers in Appendix A meet the public interest because they ensure the selection of qualified service providers and link California’s I&R providers to a national professional community. Furthermore, the FCC directed that “states will be allowed to continue to make local assignments that do not conflict with our national assignments.”<sup>89</sup>

8. Appendix A establishes procedures that will assist in maintaining and improving I&R services.

9. No carrier or consumer group voiced any objections to these proposed guidelines and application package.

10. The Workshop Report concluded that each I&R provider should serve the entire area of a county or form consortia to serve multiple counties.

11. The Workshop Report concluded that a network architecture in which 2-1-1 dialing directs a call to a single “800” (or 8YY) number appears to be simpler and faster to implement than other options.

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<sup>89</sup> *Id.*, ¶ 43.

12. The Workshop Report recommends that the Commission not mandate a particular 2-1-1 routing option since it is unclear whether another option would prove less expensive in the long term.

13. The Workshop Report finds that 2-1-1 calls should be able to terminate either at a county I&R provider or at a Regional Technical Center, which would then complete the routing of the call to a specific I&R provider.

14. The Workshop Report finds that the universal availability of 2-1-1 service will require switch translations to ensure the proper routing of calls originating on a local network.

15. The Workshop Report finds that the Commission should allow those local exchange carriers providing switch translation services to recover their costs.

16. The Workshop Report recommends that the Commission not set deadlines for 2-1-1 implementation, but should require periodic status reports.

17. CAIRS has a preference for the variable routing of calls, enabling a switch to terminate local calls directly and to hand off other calls to an 8YY number.

18. Because of the likely rollout of services at different times throughout the state, the Workshop Report recommends that the CPUC “actively monitor 2-1-1 implementation by requiring periodic status reports and establishing milestones for implementation.

19. A LEC can handle an 8YY call that originates and terminates in the same LATA.

20. Because of the current design of the telecommunications network, it is not cost-effective to require the routing of calls based on a strict adherence to county or other political boundaries. This result occurs because telecommunications exchanges do not necessarily follow county or other political boundaries.

21. In California, 2-1-1 calls can originate on the phones served by incumbent LECs, by competitive local carriers on facilities leased from ILECs, by CLCs

using their own lines, by “smart” payphones housing small computers, or by “dumb” payphones using ILEC services.<sup>90</sup>

22. For all calls placed to 2-1-1 service providers, the initial switch receiving the call (or intelligent payphone) will determine how to route it.

23. In no case, however, will it be possible to route calls strictly by county because a LECs central office frequently provides telecommunications services that straddle a county’s boundaries.

24. Unlike the payphone situation, there is no FCC mandate for eliminating this use of 2-1-1 by wireless carriers at this time, and the Scoping Memo limited the scope of this proceeding to wireline carriers.

25. Absent the implementation of 2-1-1 calling in a specific area, it is not necessary to require payphone providers to discontinue use of this number.

26. CAIRS, on behalf of I&R providers, has indicated that I&R providers will pay reasonable costs for implementing 2-1-1 dialing on the network switches of local exchange carriers.

27. The Commission has in place procedures to protect information that is competitively sensitive.

28. The FCC has ordered all local carriers to provide 2-1-1 origination service in an area implementing 2-1-1 access to I&R providers at their request. This is necessary to insure that all 2-1-1 calls will be routed properly.

29. I&R providers are willing to pay the reasonable costs of 2-1-1 call origination service.

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<sup>90</sup> Note that the scope of this proceeding does not include the routing of 2-1-1 calls made by wireless providers of telephone services.

30. Routing 2-1-1 calls to an 8YY number offers a simple way of completing 2-1-1 calls.

31. The Commission need not order incumbent local exchange carriers to offer 2-1-1 call origination services using a specific form of network architecture.

32. There is a preexisting arrangement that compensates payphone operators for originating 8YY calls.

33. It is possible for intelligent or “smart” payphones to route 2-1-1 calls to an 8YY number at no charge to the calling party.

34. The advice letter process of General Order 96-a offers a way of insuring that the prices charged by local exchange carriers for 2-1-1 switch translation services are reasonable.

35. The review process for applications by I&R providers described herein offers a reasonable way of insuring that those providing 2-1-1 I&R services in a particular service area will do so in a way that serves the public interest.

### **Conclusions of Law**

1. It is reasonable to grant the “Motion of the California Alliance of Information and Referral Services and the 2-1-1 Statewide Steering Committee (CAIRS) to Include Preliminary Network Architecture Proposals in the Record” as a reference document.

2. The provision of I&R services in California via 2-1-1 dialing is in the public interest.

3. It is reasonable to require an information and referral service provider(s) who seeks to be the provider certified by the Commission to receive 2-1-1 calls in a particular area, to submit an application letter with a completed Service Provider Application Package and a service rollout plan to the Executive Director

for Commission review, and to serve this advice letter on affected incumbent local exchange carriers and on the parties to this proceeding.

4. It is reasonable to require each I&R provider or each integrated group of I&R providers or Regional Technical Center to either serve the area of an entire county or to form consortia to serve multiple counties.

5. It is reasonable to let I&R providers and incumbent local exchange carriers (ILEC) work cooperatively to design a 2-1-1 routing service that best meets their mutual needs.

6. It is reasonable that 2-1-1 calls should terminate either at a county I&R provider or at a Regional Technical Center, which would then complete the routing of the calls to a specific I&R provider.

7. It is reasonable for local exchange carriers to recover the costs for the switch translation services that 2-1-1 dialing requires.

8. It is reasonable for the Commission to require cost information from Pacific and Verizon to justify any proposed rates for 2-1-1 switch translation services.

9. It is reasonable to permit the Small Incumbent Local Exchange Carriers to either provide cost information demonstrating the reasonableness of their charges for switch translation services or to charge the same rates as Pacific or Verizon.

10. It is reasonable to permit other local exchange carriers to use 8YY call routing to provide 2-1-1 call origination service.

11. It is reasonable to permit payphone providers to translate a 2-1-1 call into an 8YY call for both routing and billing.

12. It is not in the public interest to charge twice for the use of 2-1-1 service from payphones, once as an 8YY call and once as a local call.

13. It is reasonable to charge I&R providers for the costs of routing a 2-1-1 call.

14. The Commission will not require wireless carriers to provide 2-1-1 call origination service at this time because of the FCC's current consideration of a petition by wireless carriers to use 2-1-1 for wireless information.

15. In implementing 2-1-1 service in a particular territory, it is reasonable to require all local exchange carriers and payphone operators to route these calls.

16. It is reasonable to establish milestones as well as deadlines to spur the implementation of 2-1-1 calling service.

17. It is reasonable to require that payphone providers discontinue incompatible uses of 2-1-1 calling in conjunction with the roll out of 2-1-1 calling in a particular region.

18. It is reasonable to set a milestone of six months for the Commission's review of a request by an I&R provider or a regional technical center to provide 2-1-1 service in a particular area.

19. It is reasonable to set a deadline of four months following the filing of a request by an I&R provider to offer 2-1-1 service for the incumbent local exchange carriers to file an advice letter to offer the needed switch translation services.

20. It is reasonable to require competitive local exchange carriers providing service in an area implementing 2-1-1 calling to file an advice letter to offer the needed switch translation services within 30 days of the filing by the incumbent local exchange carriers.

21. It is reasonable to require local exchange carriers to file advice letters to offer the switch translation services needed for 2-1-1 service in compliance with the procedures of General Order 96-a.

22. It is reasonable to require that payphone service providers eliminate non-conforming uses of 2-1-1 dialing in the area over which 2-1-1 I&R services will be provided at the time that the 2-1-1 service is implemented.

23. Since implementing a 2-1-1 I&R service will pose new challenges, it is reasonable to adopt a combination of milestones and deadlines to guide implementation.

24. It is reasonable for incumbent local exchange carriers to offer 2-1-1 origination services via a tariff, an individual case basis tariff, or a contract.

25. It is reasonable to anticipate that the Commission can complete its review of the qualifications of an I&R service provider in approximately six months.

26. The Commission should review and approve the advice letters filed by local exchange carriers in accordance with the procedures of General Order 96-a.

27. It is reasonable to expect that carriers will offer 2-1-1 origination service approximately nine months after the initial filing by an informational and referral provider requesting certification by the Commission.

28. It is reasonable to expect that 2-1-1 I&R services will be available within nine months of the initial filing by an I&R provider.

29. It is reasonable to set a deadline of one year from the date the Commission issues the approvals needed to provide 2-1-1 service within which the I&R provider should initiate service. Absent further Commission action granting extensions to the 2-1-1 I&R providers, failure to implement the 2-1-1 service should result in forfeiture of the authority to offer this service.

30. The Commission should take those regulatory actions necessary to assist in the provision of I&R services in California via 2-1-1 dialing.

31. The guidelines in Appendix A recommended for Commission review of I&R service providers seeking to use 2-1-1 dialing are reasonable and in the public interest.

32. Pursuant to FCC regulations, all carriers providing local telephone service in an area where an I&R provider is offering 2-1-1 service shall provide 2-1-1 call origination service at reasonable rates.

33. It is reasonable to require Pacific and Verizon to provide cost information to enable the Commission to determine whether the rates they propose for 2-1-1 origination service are reasonable.

34. Payphone providers should discontinue non-conforming uses of 2-1-1 simultaneous with the use of this number to provide I&R services in a particular service territory.

35. In lieu of the submission of cost data, it is reasonable to permit the Small Incumbent Local Exchange Carriers to offer 2-1-1 origination service at the rates offered by Pacific or Verizon. The Small Local Exchange Carriers may concur in Pacific's or Verizon's rates and/or tariffs. Such carriers may simply make advice letter filings offering to provide service at Pacific's or Verizon's rates.

36. I&R providers should implement 2-1-1 service within a year of the Commission's taking all the regulatory actions needed to authorize the service in a particular territory.

## **O R D E R**

### **IT IS ORDERED** that:

1. The "Motion of the California Alliance of Information and Referral Services and the 2-1-1 Statewide Steering Committee (CAIRS) to Include Preliminary Network Architecture Proposals in the Record" is granted and the network architecture proposals are included in the record as reference documents.

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.

3. 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. If the Pacific Bell Telephone Company (Pacific) or Verizon California, Inc. (Verizon) serve the territory over which the 2-1-1 service will be offered, the serving carrier (or carriers) shall file advice letters proposing general tariffs, tariffs developed on an individual case basis, or contracts to make the requested service available. Pacific and Verizon shall file cost-support information demonstrating the reasonableness of the prices charged. The services shall be available no later than six months from the filing of the advice letter. These carriers shall coordinate the start of 2-1-1 service with the I&R providers. These advice letters are subject to the regulatory process described in General Order 96-a.

4. 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. The services shall be available no later than six months from the filing of the advice letter. All carriers shall coordinate the start of 2-1-1 service with the I&R providers. These advice letters are subject to the regulatory process described in General Order 96-a.

5. 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.

6. 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. Payphone service providers may route and bill the 2-1-1 calls as 8YY calls using the number secured by the I&R provider.

7. 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, 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. Competitive local carriers may elect to implement 2-1-1 call origination using only 8YY routing. The services shall be available no later than six months from the filing of the advice letter. These carriers shall coordinate the start of 2-1-1 service with the I&R providers.

8. Consistent with the goal of coordinating the start of 2-1-1 service, we establish a milestone of six months following the last advice letter filings for the completion of Commission reviews under General Order 96-a and Resolution M-4801 as modified by D.02-02-049.

9. 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, 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. Competitive local carriers may elect to implement 2-1-1 call origination using only 8YY routing. The services shall be available no later than six months from the filing of the advice letter. These carriers shall coordinate the start of 2-1-1 service with the I&R providers.

10. If an I&R provider fails to implement 2-1-1 dialing within a year after the Commission takes all the actions needed to offer 2-1-1 service, then, barring further Commission action, the certification of the I&R provider shall lapse so that another I&R provider may offer service in a particular service territory.

This order is effective today.

Dated February 13, 2003, at San Francisco, California.

MICHAEL R. PEEVEY  
President  
CARL W. WOOD  
LORETTA M. LYNCH  
GEOFFREY F. BROWN  
SUSAN P. KENNEDY  
Commissioners

# **APPENDIX A**

**GUIDELINES  
for  
CPUC STAFF REVIEW**

**2-1-1 CALIFORNIA  
SERVICE PROVIDER APPLICATION**

Proposed application review guidelines for CPUC staff  
2-1-1 California Service Provider Application

## **Section 1 - Organizational Structure, Background, and Experience**

*Review for required attachments: 3- year budget; audited financial statements.*

1.1 If the application includes a collaboration of Information and Referral (I&R) service providers, all service providers must be identified and all must apply at the same time.

1.2 The minimum service delivery area is the county. Organizations may serve one county or a group of counties.

1.3 Previous experience providing information and referral services is not required. However, such experience, especially within the proposed service area, supports the knowledge and relationships necessary to create good working relationships with direct service providers. Additionally, experience within the proposed service area may enhance an organization's ability to advocate on behalf of a client. In the absence of relevant agency history/experience, the experience of key staff should be given greater weight. All other aspects of the application being equal, organizations with previous I & R history should be given greater weight; organizations with experience providing services within the proposed service area should be given greater weight.

1.6 The application requests information regarding key manager's experience. In addition to the history and experience established at the agency level, it is important that the management staff experience indicate some history in providing information and referral services.

1.7/1.8 Once established in a community, it is important that 2-1-1 service continue without interruption. The organization's budget and financial reports should demonstrate a solvent organization with appropriate budgetary planning to support 2-1-1.

## **Section 2 - Terms and Conditions of Service**

*No attachments required; narrative length - 2 pages.*

2.1 In this section the applicant essentially agrees to provide services as the terms/conditions indicate.

2.2 The request for or acceptance of fees or compensation of any kind for referrals made by the 2-1-1 service provider should be prohibited. The possibility exists that a service provider may not provide information concerning

all the appropriate services if it accepts compensation for referrals. This prohibition applies to the 2-1-1 service provider itself and not to specialized information services to which a 2-1-1 caller may be referred.

2.3 There must be no charge to callers for 2-1-1 service beyond charges for local or measured rate service. No inter or intra LATA toll charges should apply to 2-1-1 calls. There should be no charge for referrals. No paid advertising or "commercials" should be heard on the phone lines or viewed via Internet if the 2-1-1 provider offers such a service. Monies accepted for advertising could influence the types or specific referrals offered.

2.4 2-1-1 service requires that a live person answer the phones 24 hours, 7 days a week. Taped information is not an acceptable alternative. An answering service, albeit "live", is also not an acceptable alternative because answering service operators are not trained information and referral professionals. The 2-1-1 provider in any county may contract with another information and referral service provider to provide after-hours coverage. The contracted organization must have access to the local provider's database in order to provide accurate and appropriate referrals.

***Section 3 is the organization's opportunity to present information about its service delivery strategy. Section 4 demonstrates community support in the form of endorsements from impacted service providers. Section 4 should assist the Commission to validate whether the applicant(s) has made an accurate representation in Section 3.***

### **Section 3 - AIRS Standards**

*No attachments required; narrative maximum 5 pages*

The field of Information and Referral has delivered critical information services to people with need for more than two decades. During this maturation process the Alliance of Information and Referral (AIRS), the national professional organization of information and referral service providers, in conjunction with its members, has codified best practices for the field. The standards are published in the "AIRS Standards," a professional guide for information and referral service delivery. The standards were first published in 1973 and have been revised four times; the latest edition was published in 2000. The following requirements are drawn from the AIRS 2000 Standards.

The "Standards" are organized to address the four major components of Information and Referral/2-1-1 service: 1) Service Delivery - getting the

information to the individual; 2) the Resource Database - a listing of agencies and programs; the source from which the referrals are drawn; 3) Reports and Measures - the results of which allow an agency to evaluate its service and modify as needed; and, 4) Cooperative Relationships - important to the development and/or maintenance of a coordinated system to deliver health and human services.

Information and Referral service is a composite of these four components. All specific criteria in each of the four areas must be met to obtain 2-1-1 designation.

### ***3.1 Service Delivery Standards***

For 2-1-1 designation, agencies must demonstrate in their narrative how they meet the itemized standards for service delivery. The following background information should be considered when reviewing the applicant's narrative for service delivery standards. Information and Referral/2-1-1 exists to assist individuals to navigate the fragmented and confusing landscape of the various health and human service delivery systems. It must offer enough assistance to help an individual access these services. Often this is more than simply the address and telephone number of a service provider. Therefore a range of service levels must be available and provided based on the individual need. Individuals need accurate, pertinent information about the availability of services and the eligibility requirements for health and human services in order to determine if they qualify for the service. Finally, individuals must feel confident that information given to the I & R service provider will be held in strict confidence otherwise those with needs such as substance abuse services, or anger management, for example, may well decide not to call for help.

### ***3.2 Information and Referral Resource File Standards***

The resource file standards provide minimum guidelines to ensure that there will be a body of information sufficient to support the needs of the individuals calling for help. The criteria specifically provide for verification of data on a regular basis to ensure the accuracy of information provided to callers; a consistently applied process for including or excluding agencies so that clients and the general public will be aware of the database scope and/or limitations; and a common set of data elements to ensure standardization of information from listing to listing. The standards also call for services to be indexed in a manner that creates easy access to appropriate services and programs listed in the database. Taken together these standards should result in the availability of accurate, up-to-date, and consistent information.



- Review the applicant's narrative to determine if they have written inclusion/exclusion criteria sufficient to guide the content of the resource database.
- Review the narrative to determine if they uniformly collect agency data.
- Identify the indexing tool used; if it is not the AIRS/Info Line Taxonomy, there should be plans to convert the database to that Taxonomy.
- Review the stated update procedure - it should be conducted annually at a minimum.

### ***3.3 Information and Referral Disaster Standards***

Review the narrative for the existence of a disaster plan, notation of pre and post disaster resources.

### ***3.4 Information and Referral Reports and Measures Standards***

An indirect result of Information and Referral/2-1-1 service delivery is the collection of data relating to community needs. This information, while extremely important in understanding an agency's service population, is also critically important to funders and planners within a service community. The reports and measures standards ensure that the 2-1-1 designee has the infrastructure necessary to aggregate and report on service needs.

Minimally, the data collected and reported should include number of calls organized by service need, referrals made and/or lack of available referrals; and geographic location of caller (by city or zip code.)

### ***3.5 Cooperative Relationships***

As indicated by Section 4, cooperative relationships form the backbone of Information and Referral/2-1-1 services to a community. Cooperation among agencies within service jurisdictions (one or more counties) is important to ensure that callers who may need to be referred or "handed off" to a second helping resource are well served. Child care information and referral services offer a good example of these cooperative relationships. To minimize funding of redundant services, most I & R service providers refer to other, specialized I & R service providers. Comprehensive information and Referral service providers refer to the specialized child care information and referral services rather than maintaining this specific information. Thus when an individual with child care needs contacts the comprehensive Information and Referral service provider, that provider will conference or transfer the caller to a child care information service in the same service area. A good working relationship between the

comprehensive information and referral service provider (the 2-1-1 service provider) and the specialized service provider (the child care information service) creates the network necessary to be sure the caller receives the information needed with just one call.

### 3.6 Other Organizational Standards

These remaining criteria address general administrative needs to ensure that the Information and Referral/2-1-1 program is responsibly managed.

#### **Section 4 - Demonstrated Community Support**

*Letters of Support/Endorsement required - 15 letter maximum*

Review this section of the application for breadth and scope of community support. Support from organizations that serve a large number of people may be given greater weight than support letters from smaller organizations. Support from public and non-profit service providers may be given greater weight than those from individuals or for profit businesses because I&R service has traditionally been provided on a non-profit basis in California.

## **2-1-1 California**

# **Service Provider Application Package**

**Instructions to the applicant:**

You may apply as an individual organization or a collaborative. If you are applying as a collaborative, all members of the collaborative must be identified, and information regarding these organizations provided at the same time. One agency must be identified as the lead agency for the collaborative. The lead agency will be the sole recipient unless it is manifest that another collaborator's contribution is necessary for the successful operation of the enterprise in which case the essential parties must have a written agreement detailing their relationship, commitment, and approach to dispute resolution. You must provide a response to all sections and sub-sections. You must provide all the attachments requested.

*The application for 2-1-1 Service is organized in four sections:*

*Section 1 Organizational Structure, Background and Experience*

This section establishes the organizational requirements for 2-1-1 service providers. You must meet the stated requirements to qualify for consideration as a 2-1-1 service provider. Your narrative should describe how you meet the stated requirements.

*Section 2 Terms and Conditions of Service*

This section sets forth the terms and conditions of service. You must provide services as described in this section. You must agree to the stated terms and provide a brief narrative describing how you will meet the service conditions required. For example, section 2.2 requires that 2-1-1 service will be provided by "live operators 24 hours a day..." In response to this requirement, your narrative could indicate how you plan to staff the service to provide the 24-hour coverage.

*Section 3 AIRS Standards*

This section identifies service delivery standards. These standards are based on the Alliance of Information and Referral Services national standards published in 2000. For your reference, a summary of the standards are available through the AIRS.org website. Your narrative should describe how you currently meet or intend to meet the service delivery standards. For example, Section 3.2.4 requires that the database of providers

"be updated at least annually." Your narrative should provide information regarding how this annual update is accomplished.

*Section 4 Community Support*

There can be only one 2-1-1 provider per county or groups of counties. This section requires that you demonstrate broad community support for your organization as the local 2-1-1 provider. You should include letters of support from agencies in each of the service categories identified on the form provided. Do not include more than one support letter in each of the categories or more than a total of 15 letters.

Sections 1, 2 and 3 require narrative response. Your responses should be organized in a manner consistent with the layout of the application. Each narrative has a page limit. Pages in excess of those required will not be read or considered. Some sections require attachments. Identify and include these attachments as part of your complete application package.

**SECTION 1  
ORGANIZATIONAL STRUCTURE, BACKGROUND AND  
EXPERIENCE**

This section of the application requires that the applicant provide a summary of relevant information to indicate its ability to perform required basic Information and Referral services for a designated community. The information will be used to evaluate organizational capacity.

1.1 Provide the name, address, and contact name for the organization. Provide the names and address and contact name for all collaborators or partners.

1.2 Provide documentation that indicates the organizational category of your organization, e.g., corporation, partnership, sole proprietor, profit or non-profit organization, governmental agency or any combination thereof. Also provide a list of all individuals that comprise the governance or ownership or collaborators of your organization.

1.3 State the number of years of experience the applicant has had providing information and referrals services, the types of services performed and the communities in which they were performed.

1.4 Provide proof of, or application for, authority to conduct business in the State of California.

1.5 Indicate the length of time in business under current business name and prior business names. If a corporation, include date of incorporation.

1.6 Provide a description of key managers' experience in the service to be provided or equivalent or similar experience of principle individuals in the applicant's organization.

1.7 Provide a proposed budget for the next three years. In the proposed budget you may want to consider the anticipated increase in your budget due to 2-1-1 service implementation as well as the projected source of the anticipated increased funding.

1.8 Provide an audited financial statement. Such statement shall be the most recent and complete audited financial statement available and for a fiscal period not more than 18 months old at the time of submission. This statement shall be by an independent, certified public accountant. In the event qualifying audited financial statements are not available, an unaudited statement along with the

entity's federal income tax returns for the preceding two (2) years may be submitted.

1.8.1 New organizations may provide a proposed budget, proposed funding sources, and commitments, if any, from proposed sources.

1.8.2 If a collaboration, provide proposed budget details of commitment from principal members of the collaborative and financial statements for principal members of the collaborative. A principal member is defined as contributing/raising/otherwise responsible for more than 25% of the budgeted income or any member(s) on whose experience the collaboration is relying to demonstrate its qualifications.



## **SECTION 2**

### **TERMS AND CONDITIONS OF SERVICE**

This section of the application sets forth the required service conditions for 2-1-1 service providers. To obtain 2-1-1 designation, all these conditions must be met. Applicants should prepare a narrative describing the organization's ability to meet the required conditions. The information provided will be used to evaluate the organization's ability to meet required service terms. The narrative should not exceed two pages.

2.1 The minimal geographic service area of 2-1-1 is a county. 2-1-1 service providers may serve one or more counties. State the county or counties the applicant intends to serve.

2.2 The 2-1-1 service provider applicant will not accept fees from referred organizations in return for referrals.

2.3 2-1-1 service must be provided at no charge to callers; it must also be free of commercials or advertising; supporters may be recognized on printed materials.

2.4 2-1-1 service will be provided by "live" call takers 24 hours a day, seven days a week.

2.4.1 2-1-1 services must be provided by the applicant or

2.4.2 After hours 2-1-1 services may be provided by linkage to another organization. If service is to be provided in this manner, provide the name of the organization its phone number, and the name of the contact person. Service delivery standards (see Section 3), however, must be met at all times.

2.5 2-1-1 service must be accessible 24 hours a day, seven days a week, to all callers regardless of language or disability.

2.5.1 Provide information regarding languages available via live staff.

2.5.2 Provide information regarding interpretation/translation services.

2.5.3 Provide information regarding TTY/TDD access.

## **SECTION 3**

### **AIRS STANDARDS**

The Alliance of Information and Referral Services (AIRS), the national professional membership organization of information and referral service providers, has established standards for delivery of information and referral services. The applicant must demonstrate its understanding of these standards and agree to adhere to them in the delivery of 2-1-1 services. The applicant should provide a narrative description that illustrates how it will meet these service delivery standards. The maximum narrative length is five pages.

#### **3.1 Information and referral service delivery standards**

3.1.1 Organization staff must provide a range of information responses

3.1.1.1 Provision of simple information e.g., name, address, and telephone number of service provider.

3.1.1.2 One-to-one referrals based on assessment of the client's needs.

3.1.1.3 Advocacy and intervention as needed to increase the likelihood that people will obtain the benefits to which they are entitled.

3.1.1.4 Follow-up services to address situations where further assistance may be required.

3.1.2 Information and referrals must be accurate and pertinent to the needs presented.

3.1.3 Interactions between clients and I & R agency staff must be confidential.

#### **3.2 Information and Referral Resource File Standards**

3.2.1 The organization must have written criteria that identify what is included or excluded from the resource database.

3.2.2 The organization must have a standardized profile (resource information collection tool) that collects identified data elements regarding all agencies and/or services for which it is supplying information or to whom it is making referrals.

3.2.3 The entire database must be updated at least annually to provide for up-to-date referral information.

3.2.4 The organization must index services using the AIRS/Info Line of Los Angeles Taxonomy of human services or

3.2.5 The organization must agree to convert the resource database to Taxonomy indexing within three years.

### 3.3 Information and Referral Disaster Standards

3.3.1 2-1-1 service must be available in the event of a local disaster, such as an earthquake, flood, or other emergency.

3.3.2 The organization must have a disaster plan.

3.3.3 The organization must have a pre-disaster resource database.

3.3.4 If such a plan or database does not exist, provide information regarding plans to create these.

### 3.4 Reports and Measures Standards

3.4.1 The organization must have a data collection tool that has the capability to collect and maintain the confidentiality of inquirer data.

3.4.2 The organization's data collection tool must have the capability to collect information regarding referrals made for assessed needs and service gaps when no referrals were identified for assessed needs.

3.4.3 The organization must have a report tool that is capable of aggregating and organizing inquirer data and resource data to support internal analysis, advocacy and community planning activities.

### 3.5 Cooperative Relationships Standards

3.5.1 The organization must have cooperative working relationships with targeted and local I&Rs operating in the same service area. (List those agencies and include letters of support as described in Section 4.)

3.5.2 The organization must provide seamless access to 2-1-1 service throughout its service area. Callers make only one call for community service information regardless of the location within the system from which they are calling.

### 3.6 Other Organizational Standards

3.6.1 The organization must provide training for all aspects of the Information and Referral/2-1-1 services to paid and volunteer staff.

3.6.2 The organization must have a program to increase public awareness of information and referral/2-1-1 services, objectives, and their value to the community.

3.6.3 The organization must have an evaluation plan to identify needed program improvements.

3.6.3.1 The plan must be implemented at least annually.

*2-1-1 California Service Provider Application*

**SECTION 4**  
**DOCUMENTATION OF COMMUNITY SUPPORT**

To be designated as a 2-1-1 service provider you must demonstrate strong community support for your application. This support should come from a wide range of organizations and agencies that are stakeholders in the health and human services network in your community.

Leaders of organizations that support your application should complete the attached "***Endorsement of 2-1-1 Application.***" Completed endorsements should be submitted with the application.

You should submit endorsements from major agencies and organizations that provide direct service or information and referral service in the proposed service area in the fields listed below where they are available. Endorsements from other types of organizations and from elected officials are also valuable.

Please cross out any organization or entity that is not available in your county or locality, even by extension from another area. Note those services that you directly provide. *Check all endorsements that are attached. Do not include more than 15 endorsements or letters of support.*

- AIDS/HIV Service
- Alcohol and Drug Service
- Business/Labor
- Services for Children and Families
- Crisis/Suicide Hotline
- Disability Service
- Domestic Violence Service
- Education
- Emergency Food Provider
- Emergency (disaster) Service
- Employment Service
- Health Service
- Homeless Service
- Library or Library System
- Mental Health Service
- Rape Crisis Service
- Senior Service
- Women's Service
- Veterans Groups

*2-1-1 California Service Provider Application*

Endorsement of Applicant as 2-1-1 Service Provider

**NOTE TO ENDORSER: 2-1-1 is a unique social utility. There can only be one 2-1-1 service provider in a given area. Therefore, you should only endorse one organization to be designated as the 2-1-1 service provider in the specified area. If you make multiple, competing endorsements, the last dated endorsement will supersede all others.**

**Instructions to endorser:** \_\_\_\_\_ is applying to

Name of Applicant Agency

the California Public Utilities Commission (CPUC) to be designated as the 2-1-1 service provider for \_\_\_\_\_.

Name of county. If less than a full county, describe specific portion.

\_\_\_\_\_ is providing information to the CPUC that

Name of Applicant Agency

it has the necessary organizational capacity to provide 2-1-1 service and that it is familiar with and adheres to the professional standards for information and referral. Another essential element of its application is a demonstration of community support for its designation as the 2-1-1 service provider in its area.

2-1-1 is a unique social utility. There can only be one 2-1-1 service provider in a given area. Therefore, you should only endorse one organization to be designated as the 2-1-1 service provider in the specified area. If you make multiple, competing endorsements, the last dated endorsement will supersede all others.

The undersigned endorses \_\_\_\_\_ as the  
Name of Agency

organization that is best qualified to provide 2-1-1 service in the proposed service area for the following reasons: (Include a description of your relationship with the applicant organization and comments regarding your knowledge of the applicant's experience and ability to provide comprehensive information and referral services. If further space is required, attach an additional sheet.)

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Name \_\_\_\_\_

Title \_\_\_\_\_

Organization \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone \_\_\_\_\_ Fax \_\_\_\_\_

E-mail \_\_\_\_\_

Type of organization:

Government \_\_\_\_\_ Nonprofit [501][c][3] \_\_\_\_\_ Other (specify): \_\_\_\_\_

Briefly describe the service(s) provided by your organization:

Area served by your organization:

Number of unduplicated clients provided service annually \_\_\_\_\_

Annual budget \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

**(END OF APPENDIX A)**



R.02-01-025 COM/SK1/TJS/hkr **APPENDIX B Service List**

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