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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Consumer Programs Branch**

**RESOLUTION T-17255
May 26, 2011**

R E S O L U T I O N

Resolution T-17255. Yolo County. Request for certification as the 2-1-1 service provider for Yolo County. By Letter to Executive Director filed on March 14, 2011.

Summary

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

Background

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

Included among these policies were guidelines and procedures whereby the Commission can certify I&R providers as eligible to purchase network telephone service that will enable them to receive calls from those who dial 2-1-1. Most of the procedures for I&R providers to follow in requesting authority to use the 2-1-1 dialing code are contained in D.03-02-029's Ordering Paragraph 2, quoted below:

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

Yolo filed a complete copy of its application letter¹ requesting certification as the 2-1-1 service provider in Yolo County that was received by the Commission's Executive Director on March 14, 2011. On March 11, 2011 Yolo sent to the service list for R.02-01-025 copies of its application letter.

We remind local exchange carriers of D. 03-02-029, Ordering Paragraph 3, which states "Within four months of the filing of a letter by I&R providers or a regional technical center seeking to initiate 2-1-1 service, the incumbent local exchange carriers serving the territory over which the 2-1-1 service will be offered shall file advice letters to provide the 2-1-1 switch translation services required. Ordering Paragraph 4 states "All other incumbent local carriers serving a territory over which the 2-1-1 service will be offered shall provide the needed switch translation service, but may either concur in the price terms offered by Pacific or Verizon or submit their own cost support information. This filing shall follow that of Pacific or Verizon by no more than 30 days." Competitive local carriers must comply with Ordering Paragraph 7, which states in part, "Within one month of the filing of an advice letter by incumbent local exchange carriers to offer 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-A², 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."

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

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

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

Notice/Protests

Yolo states that it mailed a copy of its application letter to SBC Communications now AT&T as well as to the service list for R.02-01-025, which includes the appropriate incumbent local exchange carriers. The Communications Division published notice of Yolo's application letter in the Commission Daily Calendar on March 16 through 21, 2011. In response to Yolo application letter, the California Alliance of Information and Referral Services, Inc. (CAIRS) submitted a letter dated April 1, 2011 supporting the request of Yolo to use the 2-1-1 dialing code in Yolo County. No other comments were submitted.

Discussion

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

Yolo is a county government in the State of California. The documents included to support this categorization are its articles of incorporation, including by-laws, and letters from the Internal Revenue Service. The county office submitting this application is the Yolo County Library located at 226 Buckeye Street, Woodland, Ca 95695-2600. The contact person is Patricia Wong, County Librarian, at (530) 666-8005 and email at Patty.Wong@yolocounty.org.

YoloLINK, a human service database, has been provided by the Yolo County Library since 1991. YoloLINK was created using the framework of the Yolo County Library's Integrated Library System, Innovative Interfaces Inc., as a complement to the card catalog online. The Library has been an AIRS and CAIRS member for many years; library staff designed the infrastructure of the database to include common key words and phrases as well as AIRS standard structure. Information is verified for each entry on an annual basis through a myriad of contacts.

Development of 2-1-1 services in Yolo County has been sporadic. Several providers attempted to create their own set of databases but the only robust database that has been maintained has been YoloLINK. Throughout YoloLINK's existence, I & R providers have come to rely on the annual updates and reliability of the YoloLINK content. Even Legal Services of Northern California, the Area 4 on Aging I & R service for Yolo County, uses YoloLINK to answer many of their questions.

The YoloLINK database was delivered originally as a printed directory of human service agencies with multiple indexes. The information was later delivered by CD-ROM and later-completely online and available through the internet (www.yololink.org), becoming a resource for individual consumers as well as a tool for service providers.

A YoloLINK Steering Committee, made up of community members representing various service providers and I & R agencies (Woodland Senior Centers, Davis Senior Center, Yolo Family Service Agency, Probation, Health Department, DESS), guided YoloLINK development. The data is available to all Yolo County community providers in addition to the Department of Employment and Social Services. Phone service has always been a component of answering YoloLINK questions but only during regular business hours. Local branch libraries use YoloLINK to answer regional questions about health and human service resources, but once again access has been limited.

In 2008, Yolo County began to examine additional ways to ready YoloLINK operations for 2-1-1 services but lacked the funding to migrate the system. The database content would still be maintained by Library staff, but a call center was critical to the equation. The County held dozens of outreach meetings through the community to determine 2-1-1 needs and heard from dozens of groups and hundreds of consumers that a 2-1-1 service would be readily used. In fact, 2-1-1 Sacramento reported answering close to 800 calls annually from the West Sacramento region of Yolo County through 2-1-1 as this area shares the same area code with Sacramento.

Kaiser Permanente Northern California approached Yolo County Library and asked the organization to apply for a 2-1-1 RFP and provided grant funding to complete the application. This grant enabled the county to migrate to a 2-1-1 ready infrastructure – IRis³ – and to engage in a contractual agreement with Community Planning Services Council to provide the needed 24/7 call center services. Community Planning Services Council has had an established and proven record of effective 2-1-1 service and working with other regional counties.

YoloLINK staff provides regular trainings to consumer groups and service providers on best use of database contents but the framework associated with the integrated library system has been inflexible and limited in terms of design for optimal searching and sharing between organization entities.

³ IRis software is a database product developed by Bowman Systems specifically for community information and is based on the national standards of the Alliance of Information and Referral Systems (AIRS). Several 2-1-1 organizations use this software including 2-1-1 Sacramento.

Although YoloLINK is now primarily on line, the printed directory has always been a strong component of direct service. With limited internet access in some of the more rural and geographically isolated areas throughout the County, providers preferred the ease of a single directory that was well indexed and available regardless of the internet capabilities in the location served.

As the Yolo County Library continues to implement the transfer of YoloLINK to 2-1-1, the database will still be maintained by the Library and will feature a new consumer friendly internet interface; information will be uploaded regularly to Community Planning Council for integration in their system. Additional staff will be hired to manage the database and promote 2-1-1 services, train providers and consumers and maintain partnerships with statewide 2-1-1 collaboratives. A 2-1-1 Yolo Coalition of providers will provide direction, guidance and a consumer voice to advise the continual development of the database and 2-1-1 services.

Yolo will be contracting with 2-1-1 Sacramento for provision of call center services. 2-1-1 Sacramento has the internal protocols to ensure calls are handled consistent with guidelines developed by the Alliance of Information and Referral Systems including call handling, database development and maintenance and disaster response and preparedness.

Yolo provided a three year budget for the Yolo County service as part of their application. Yolo budget and financial statements indicate a stable and solvent financial position. It appears that Yolo has appropriate budgetary planning procedures to support 2-1-1 service at current call volumes.

The second section of the prescribed application sets forth the required service conditions that a 2-1-1 service provider must meet. Section 2 of Yolo's application indicates that it does not and will not receive fees from referred organizations for referrals and no fees or charges levied to providers listed in its database.

2-1-1 Sacramento's staff currently provides I&R services in English, Spanish, Thai, Mandarin, Cantonese, Lao, Mien, and Khmer (Cambodian) and contracts with a telephone multi-lingual translation service with access to more than 150 languages and dialects and has experience with I&R. TTY/TDY services are in place. All of these options will be available with the implementation of 2-1-1 in Yolo County.

In the third section of the prescribed application, the applicant must demonstrate its understanding of and must agree to adhere to the standards for delivery of I&R services as established by the Alliance of Information and Referral Services (AIRS). 2-1-1 Sacramento's Information and Referral program has internal protocols to ensure calls are handled consistent with guidelines developed by AIRS. AIRS' guidelines are the basis for

the service delivery standards associated with use of the 2-1-1 dialing code as specified by the CPUC Decision 03-02-029. Yolo's application included descriptions of 2-1-1 Sacramento's policies in the areas of call assessment and follow-up, confidentiality, database standards, disaster readiness, reports and measures, cooperative relationships, training, marketing, and program evaluation. These policies appear to meet the standards established by AIRS.

In the fourth section of the prescribed application, the applicant demonstrates its level of community support by including letters of endorsement from organizations and agencies that are stakeholders in the health and human services network in its community. Yolo included in its application letters of endorsement from eighteen different organizations and agencies in a broad range of health and human service fields throughout Yolo County. Four additional endorsements were pending at the time the application was filed. These endorsements demonstrate broad community support.

In processing Yolo's 2-1-1 application, the Communications Division considered the input of the Yolo County government because it oversees the operations of county hospitals, a county welfare department, and numerous other agencies and programs in the fields of health and human services, and is best equipped to evaluate whether an I&R provider is well suited to provide comprehensive I&R service in Yolo County. California's size and diversity, in geography, politics, and many other categories, argue against a statewide "one size fits-all" approach to evaluating and choosing comprehensive I&R providers. County governments can best apply local standards and local knowledge to this difficult but important task. On January 25, 2011, the Yolo County Board of Supervisors, Matt Rexroad, Chairman sent a letter endorsing Yolo's application to serve as the 2-1-1 provider of Yolo County residents and employees. The Commission values the input of the Yolo County Board of Supervisors on this matter, and takes official notice of its action.

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

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

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

Findings

1. Yolo County, hereinafter referred to as Yolo sent its application letter for certification as the 2-1-1 service provider for Yolo County to the Commission on March 15, 2011.
2. CAIRS submitted written comments in support of Yolo's application for provision of 2-1-1 services in Yolo County on April 1, 2011. No other comments were submitted.
3. Yolo's application provides sufficient information to meet the four major sections of the 2-1-1 application process required by D. 03-02-039.
4. Matt Rexroad, Chairman of the Yolo County Board of Supervisor sent a letter to the Commission on January 25, 2011, endorsing Yolo's application to serve as the 2-1-1 provider for Yolo County.
5. CD concludes that Yolo's application meets the requirements established by D. 03-02-029 to use the 2-1-1 dialing code.

THEREFORE, IT IS ORDERED that:

1. Yolo County is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Yolo County.
2. This authority is granted for an indefinite term, and is subject to review upon showing sufficient grounds to revise or rescind the term. Any process to contest, revise, or rescind this authority shall provide notice to all affected parties and an opportunity to be heard.
3. If Yolo County cannot implement 2-1-1 dialing within a year after the Commission's approval of Yolo County's application for provision of 2-1-1 service in Yolo County

