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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Consumer Programs Branch**

**RESOLUTION T-17253
May 20, 2010**

R E S O L U T I O N

Resolution T-17253. United Way of Santa Cruz County. Request for certification as the 2-1-1 service provider for Santa Cruz County. By Letter to Executive Director filed on March 24, 2010.

Summary

This resolution grants United Way of Santa Cruz County hereinafter referred to as UWSC, the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Santa Cruz 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) 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.

UWSC filed a complete copy of its application letter¹ requesting certification as the 2-1-1 service provider in Santa Cruz County, as well as a copy with information UWSC considered confidential redacted, that was received by the Commission's Executive Director on March 24, 2010. On the same date, UWSC sent to the service list for R.02-01-025 redacted 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

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.

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.”

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

UWSC 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 UWSC’s application letter in the Commission Daily Calendar on March 30 through April 6, 2010. In response to UWSC application letter, the California Alliance of Information and Referral Services, Inc. (CAIRS) submitted a letter dated March 31, 2010 supporting the request of UWSC to use the 2-1-1 dialing code in Santa Cruz 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.

UWSC is a non profit organization incorporated 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. UWSC is located at 1220 41st Avenue, Suite C, Santa Cruz, Ca 95010. The contact person is Mary Lou Goeke, at (831) 465 2202 and email at mlgoeke@unitedwaysc.org.

The process to establish which agency should be the 2-1-1 provider for Santa Cruz county began in the summer of 2008. The Santa Cruz County public-private partnership, The Emergency Management Council (EMC₃), began discussing the need for 2-1-1 in times of disaster. Mary Lou Goeke, Executive Director of the United Way of Santa Cruz County was invited to several meetings to discuss how this could be accomplished. The Santa Cruz County Office of Emergency Services secured a \$10,000 planning grant which was awarded to the United Way to hire a consultant. In January, 2009, the consultant began convening interested stakeholders in a Needs Assessment

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

Committee to conduct a needs assessment and plan for 2-1-1. The stakeholders involved included both public and private health and human services representatives, public library staff, specialized information and referral providers, as well as elected officials and providers of disaster response services.

The 2-1-1 Needs Assessment Committee met several times during the spring of 2009. 2-1-1 providers from other counties and social service providers were interviewed about the benefits of having a 2-1-1 system in place. Existing information and referral systems, the Santa Cruz City and County Library, Senior Network Services for elders, Defensa de Mujeres/Women's Crisis Support for victims of domestic violence and rape crises, the Child Abuse Hotline, the community Action Board's Shelter Hotline, the Food Hotline operated by the Second Harvest Food Bank, and the Child Development Resource Center, were reviewed. Each existing information & referral service only operated during business hours and was unable to provide assistance beyond its' own scope and mission. The library's system did operate outside of business hours, but is web-based and no live specialist is available to assist callers.

2-1-1 was identified as a way to unify the fragmented array of existing services, to ensure that information and referral was available during and outside of business hours and to ensure that a live specialist is available for assistance to callers.

The Needs Assessment Committee explored ways of bringing 2-1-1 to Santa Cruz County. It was determined that maintaining a call center would not be cost effective. Requests for Proposals were distributed to all 2-1-1 providers in California for the provision of 2-1-1 service to Santa Cruz County. The Committee reviewed two proposals, one from Interface Family and Children's Service of Ventura County and one from the United Way of the Bay Area, HELPLINK. While both proposals were excellent and similar in cost, United Way of the Bay Area's HELPLINK was selected because of their extensive experience in providing 2-1-1 services for multiple counties.

UWSC will be managing the I&R contract for Santa Cruz County with United Way of the Bay Area, HELPLINK (HELPLINK). UWSC currently has two staff members engaged part time in planning and implementation of Santa Cruz County 2-1-1 program. HELPLINK personnel will be trained on the localities in Santa Cruz County. The I&R database, utilized by 2-1-1 in the provision of I&R, will be maintained by UWSC.

HELPLINK 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.

UWSC provided a three year budget as part of its' application. UWSC's budget and financial statements indicate a stable and solvent financial position. It appears that UWSC 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 UWSC'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.

HELPLINK staff currently provides I&R services in English, Spanish, Cantonese and Mandarin and contracts with Tele-Interpreters multi-lingual translation service with access to more than 160 languages. TTY/TDY services are in place. All of these options will be available with the implementation of 2-1-1 in Santa Cruz 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). HELPLINK'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. UWSC's application included descriptions of its policies in the areas of call assessment and follow-up, confidentiality, database standards, disaster readiness, reports and measures, cooperative relationships, training, marketing, and program evaluation. These policies appear to meet the standards established by AIRS.

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. UWSC included in its application letters of endorsement from nineteen different organizations and agencies in a broad range of health and human service fields throughout Santa Cruz County. Four additional endorsements were pending at the time the application was filed. These endorsements demonstrate broad community support.

In processing UWSC's 2-1-1 application, the Communications Division considered the input of the Santa Cruz 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 Santa Cruz County. California's size and diversity, in geography, politics, and many other

categories, argue against a statewide “one size fits-all” approach to evaluating and choosing comprehensive I&R providers. County governments can best apply local standards and local knowledge to this difficult but important task. On March 23, 2010, the Santa Cruz County Board of Supervisors, Tony Campos, Chairperson sent a letter endorsing UWSC’s application to serve as the 2-1-1 provider of Santa Cruz County residents and employees. The Commission values the input of the Santa Cruz 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 Santa Cruz 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 Santa Cruz 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 UWSC 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. United Way of Santa Cruz County, hereinafter referred to as UWSC sent its application letter for certification as the 2-1-1 service provider for Santa Cruz County to the Commission on March 24, 2010.

2. CAIRS submitted written comments in support of UWSC's application for provision of 2-1-1 services in Santa Cruz County on March 31, 2010. No other comments were submitted.
3. UWSC'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. Tony Campos, the Chairperson of the Santa Cruz County Board of Supervisor sent a letter to the Commission on March 23, 2010, endorsing UWSC's application to serve as the 2-1-1 provider for Santa Cruz County.
5. CD concludes that UWSC'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. United Way of Santa Cruz 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 Santa Cruz 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 United Way of Santa Cruz County cannot implement 2-1-1 dialing within a year after the Commission's approval of United Way of Santa Cruz County's application for provision of 2-1-1 service in Santa Cruz County and the needed tariffs of the telecommunications service providers ordered in Ordering Paragraphs 3, 4, and 7 of D.03-02-029, then, barring further Commission action, the certification of United Way of Santa Cruz County shall lapse so that another I&R provider may apply to offer service in a service territory containing Santa Cruz County.
4. United Way of Santa Cruz County shall notify the Director of the Communications Division in writing of the date 2-1-1 service is first rendered to the public, within five business days after service begins.

This Resolution is effective today.

I hereby certify that the Public Utilities Commission at its regular meeting on May 20, 2010 adopted this Resolution. The following Commissioners approved it:

PAUL CLANON
Executive Director