

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Telecommunications Division
Market Structure Branch**

**RESOLUTION T-16825
April 1, 2004**

R E S O L U T I O N

Resolution T-16825. Info Link. Request for certification as the 2-1-1 service provider for Orange County.

By Letter to Executive Director dated October 2, 2003.

Summary

This resolution grants People for Irvine Community Health dba Info Link Orange County (Info Link) the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Orange County. This authority is granted for an indefinite term, and can be contested by letter to the Executive Director or by formal application to the Commission.

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.

On October 2, 2003, Info Link sent to the Commission's Executive Director a complete copy of its application letter¹ requesting certification as the 2-1-1 service provider in Orange County, as well as a copy with information Info Link considered confidential redacted. On the same date, Info Link 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."² 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-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."

¹ The terms "application 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 Verizon requested and was granted an extension of time until April 8, 2004 to file the required advice letter.

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

Info Link states that it mailed a copy of its application letter to SBC Communications as well as to the service list for R.02-01-025, which includes the appropriate incumbent local exchange carriers. The Telecommunications Division published notice of Info Link's application letter in the Commission Daily Calendars on December 9 through December 15, 2003. Written comment on Info Link's application letter was received October 17, 2003 from California Alliance of Information and Referral Services, Inc. (CAIRS), supporting the request of Info Link to use the 2-1-1 dialing code in Orange County.

Discussion

The application 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, its structure, its background, and experience.

Info Link is a non-profit corporation, incorporated in California on July 25, 1984 as People for an Irvine Community Hospital. In 1987 the corporation filed restated articles of incorporation changing its name to People for Irvine Community Health. In 1995 the corporation began doing business as Info Link Orange County. Info Link filed letters from the Internal Revenue Service and the California Franchise Tax Board that confirm its categorization as a non-profit corporation. Its location is 2081 Business Center Drive, Suite 130, Irvine CA 92612-1115. The contact person is Angie Baur, Executive Director, (949) 955-2255.

Info Link's application states that in 1988, it created an information and referral line in cooperation with the City of Irvine, and soon expanded to serve all of Orange County with comprehensive I&R service for health and human services. Info Link provides information and referral to hundreds of specialized providers of human services in Orange County, and has been the official I&R provider for Orange County's United Way since 1990. Info Link manages and has maintained the comprehensive I&R database for the Orange County Social Services Agency for over 12 years.

Furthermore, Info Link is a member of the Human Services Resource Committee, which is a collaborative effort to prepare local agencies in Orange County to respond in the

event of an emergency, in partnership with the primary local responders, the Emergency Operations Center and the Red Cross.

Info Link's application indicates that all three of its key managers have many years of experience either directly in comprehensive I&R service, or in similar human services planning and information management.

Info Link's budget and financial statements indicate a stable and solvent financial position. It appears that Info Link has appropriate budgetary planning procedures to support 2-1-1 service at current call volumes. Info Link indicates that its current funding sources cannot provide the level of revenue required for the expansion necessary for a quality 24/7/365 2-1-1 call center, and that its board of directors along with the 2-1-1 steering committee have strategic plans for obtaining diversified funding for this project.

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 Info Link's application indicates that Info Link does not and will not receive fees from referred organizations nor charge providers to be listed in its database. Furthermore, Info Link provides its service at no charge to callers and there are no advertisements or commercial sponsorship messages on its lines. Info Link states that it currently does not operate 24 hours per day, but is planning to provide continuous operation of its call center. It is also exploring alternatives such as contracting with other local agencies or with surrounding county partners that offer or soon will be offering 2-1-1 service, in the event that Info Link's staffing and funding capacity would not allow continuous operation of its own call center. Info Link provides its I&R services live by staff and trained volunteers, and currently it has staff capacity to offer services in English and Spanish. Info Link states that it will make a concerted effort to hire Spanish and Vietnamese bilingual I&R specialists as it hires to expand its staff. Info Link also uses tele-interpreting services which allow it to access more than 150 languages.

In the third section of the prescribed application, the applicant must demonstrate its understanding of and agreement to adhere to the standards for delivery of I&R services established by the Alliance of Information and Referral Services (AIRS). Info Link's application includes 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 be more than adequate 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 up to 15 letters of endorsement from organizations and agencies that are stakeholders in the health and human services network in its

community. Info Link included in its application letters of endorsement from 15 different organizations and agencies in a broad range of health and human service fields including homeless service, health, mental health, employment, domestic violence, disability, emergency (disaster), alcohol and drugs, and senior services. Many of Info Link's endorsements are from county agencies in Orange County, indicating its close integration with local government in its area of service.

In processing this 2-1-1 application, Telecommunications Division considered the opinion of Orange County government, which 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 Orange 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. The Chairman of the Orange County Board of Supervisors wrote a letter on September 12, 2003 endorsing Info Link to serve as the 2-1-1 provider for Orange County residents and employees. The Commission values the input of the Orange County Board of Supervisors on this matter.

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 Orange 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 Orange 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 Telecommunications Division concludes that the application letter filed by Info Link 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), the otherwise applicable 30-day period for public review and comment is being waived.

Findings

1. Info Link sent its application letter for certification as the 2-1-1 service provider for Orange County to the Commission on October 2, 2003.
2. One written comment on Info Link's application was filed.
3. The Commission should consider the judgment and expertise of county government for the selection of the county's comprehensive I&R provider.
4. The Chairman of the Orange County Board of Supervisors wrote a letter to the Commission on September 12, 2003, endorsing Info Link to serve as the 2-1-1 provider for Orange County.
5. TD concludes that Info Link's application meets the requirements established by D.03-02-029 to use the 211 dialing code.

THEREFORE, IT IS ORDERED that:

1. People for Irvine Community Health dba Info Link Orange County (Info Link) is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Orange County.
2. This authority is granted for an indefinite term, and can be contested by letter to the Executive Director or by formal application to the Commission. Any process to contest, revise, or rescind this authority shall provide notice to all affected parties and an opportunity to be heard.
3. If Info Link fails to implement 2-1-1 dialing within a year after the Commission's approval of Info Link and of the telecommunications service providers' tariffs or contracts ordered in Ordering Paragraphs 3, 4, and 7 of D.03-02-029, then, barring further Commission action, the certification of Info Link shall lapse so that another I&R provider may apply to offer service in a service territory containing Orange County.

4. Info Link shall notify the Director of the Telecommunications Division in writing of the date 2-1-1 service is first rendered to the public, within five days after service begins.

This Resolution is effective today.

I hereby certify that the Public Utilities Commission at its regular meeting on April 1, 2004 adopted this Resolution. The following Commissioners approved it:

/s/ WILLIAM AHERN

WILLIAM AHERN
Executive Director

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