

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

**Telecommunications Division  
Market Structure Branch**

**RESOLUTION T-16827  
May 27, 2004**

**RESOLUTION**

Resolution T-16827. Northern California Council for the Community's (NCCC) Helplink program. Request for certification as the 2-1-1 service provider for San Francisco County.

By Letter to Executive Director dated November 20, 2003.

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**Summary**

This resolution grants Northern California Council for the Community's (NCCC) Helplink program, hereinafter referred to as Helplink, the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of San Francisco 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.

On November 20, 2003, Helplink sent to the Commission's Executive Director a complete copy of its application letter<sup>1</sup> requesting certification as the 2-1-1 service provider in San Francisco County, as well as a copy with information Helplink considered confidential redacted. On the same date, Helplink 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."<sup>2</sup> 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

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<sup>1</sup> 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.

<sup>2</sup> Verizon requested and was granted an extension of time until April 8, 2004 to file required advice letter.

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.”

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**

Helplink 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 Helplink’s application letter in the Commission Daily Calendars on February 4 through February 10, 2004. Written comments on Helplink’s application letter were received from California Alliance of Information and Referral Services, Inc. (CAIRS), supporting the request of Helplink to use the 2-1-1 dialing code in San Francisco 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.

NCCC is a non-profit corporation, incorporated in California in 1993 as the Northern California Community Services Council. In 1996, the organization’s name changed to its current form of NCCC Helplink program, hereinafter referred to as Helplink. The documents Helplink included to support this categorization are NCCC’s articles of incorporation, including amendments, and letters from the Internal Revenue Service. Its location is 221 Main Street, Suite 300, San Francisco, CA 94105. The contact person is Edward A. Schoenberger, President, at (415) 808-4304.

Helplink’s application states that for over 28 years, it has served the San Francisco area with comprehensive information and referral (I&R). Helplink’s current service area includes San Francisco, Marin, Napa, Solano counties, a total population of 1,152,833 residents and a geographical area of 2,150 square miles. Helplink’s application demonstrates that it is firmly established among health and human service agencies within San Francisco, including programs supporting assisted living, treatment for substance abuse, emergency shelter, access to food and emergency services. Helplink has been active in disaster preparedness. Helplink also operates several specialized I&R programs, which include the Immigration Assistance Line (IAL), The Homeless

Prevention Program, The Self-Help Program, The Holiday Program and the Earned Income Credit Program. Furthermore, Helplink collaborates with other service providers and community organizations in order to maximize resource and leverage the efforts of non-profit organizations to bring about community improvement.

Helplink'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.

Helplink's budget and financial statements indicate a stable and solvent financial position. It appears that Helplink 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 Helplink's application indicates that it does not and will not receive fees from referred organizations nor charge providers to be listed in its database. Furthermore, Helplink provides its service at no charge to callers and there are no advertisements or commercial sponsorship messages on its lines. Helplink states that it currently operates 24/7/365. Information and Referral services are provided live by staff and trained volunteers, and currently it has staff capacity to offer services in English, Spanish and Cantonese. Tele-interpreting services are also utilized and are available for 150 languages. Helplink also provides consistent quality service to the hearing impaired community through a dedicated TTY/TDD telephone number and California Relay Service.

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). Helplink'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. Helplink included in its application letters of endorsement from 18 different organizations and agencies in a broad range of health and human service fields including Kaiser Permanente, volunteer legal assistance programs, the San Francisco Public Library and the City's Department of Aging and Adult Services. Many of Helplink's endorsements include both private and public entities within San Francisco.

In processing this 2-1-1 application, Telecommunications Division sought the input of the San Francisco 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 San Francisco. 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 9, 2004, a letter from the Telecommunications Division was sent to the San Francisco Board of Supervisors for their comments or any input on the application of Helplink of San Francisco. Supervisor Fiona Ma, District 4, sent a reply to TD's letter on April 13, 2004 indicating that it has reviewed the application. Although the Supervisor's letter did not provide a specific endorsement from the city, the letter acknowledged that Helplink has been providing information and referral services in San Francisco and the Bay Area for nearly 30 years. Given this acknowledgement and the 18 letters of endorsement from a broad array of community organizations, we are satisfied that Helplink has demonstrated that its application has community support.

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 San Francisco 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 San Francisco 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 Helplink 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. Helplink sent its application letter for certification as the 2-1-1 service provider for San Francisco County to the Commission on November 20, 2003.
2. One written comment from CAIRS was filed in support of Helplink's application.
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 San Francisco County Board of Supervisor responded to the letter sent on March 9, 2004 acknowledging Helplink's application to serve as the 2-1-1 provider for San Francisco County and its history of providing information and referral services in San Francisco and the Bay Area for nearly 30 years.
5. TD concludes that Helplink'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. Helplink is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of San Francisco 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 Helplink fails to implement 2-1-1 dialing within a year after the Commission's approval of Helplink 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 Helplink shall lapse so that another I&R provider may apply to offer service in a service territory containing San Francisco County.
4. Helplink 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 May 27, 2004 adopted this Resolution. The following Commissioners approved it:

/s/ WILLIAM AHERN

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WILLIAM AHERN  
Executive Director

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