

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Telecommunications Division
Market Structure Branch**

**RESOLUTION T-16832
May 27, 2004**

R E S O L U T I O N

Resolution T-16832. Interface Helpline. Request for certification as the 2-1-1 service provider for Ventura County.

By Letter to Executive Director dated January 2, 2004.

Summary

This resolution grants Interface Children and Family Services of Ventura County (a.k.a. Interface Community Inc.), including a sub-unit of the organization known as Helpline (referenced in this resolution as “Interface Helpline”) the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Ventura 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 January 2, 2004, Interface Helpline sent to the Commission's Executive Director a complete copy of its application letter¹ requesting certification as the 2-1-1 service provider in Ventura County, as well as a copy with information Interface Helpline considered confidential redacted. On the same date, Interface Helpline 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

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 required advice letter.

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

Interface Helpline 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 Helpline’s application letter in the Commission Daily Calendars on February 4 through February 15, 2004. Written comments on Helpline’s application letter were received from California Alliance of Information and Referral Services, Inc. (CAIRS), supporting the request of Interface Helpline to use the 2-1-1 dialing code in Ventura 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.

Interface Children and Family Services of Ventura County (a.k.a. Interface Community, Inc.), including a sub-unit of the organization known as Helpline (hereinafter referred to as “Interface Helpline”). Interface Helpline is a non-profit corporation, incorporated in California in 1975. The documents Interface Helpline included to support this categorization are its articles of incorporation, including amendments, and letters from the Internal Revenue Service. Its location is 1305 Del Norte Road, #130, Camarillo, CA 93010. The contact person is Charles T. Watson, President and CEO, (805) 485-6114.

Interface Helpline’s application states that for the past 25 years, it has been formally designated the comprehensive information and referral (I&R) provider for all of Ventura County. Interface Helpline’s current service area includes an area of 1,873 square miles, contains 10 incorporated cities and has a total population of 890,000. Interface has been providing information and referral assistance, emergency and transitional shelter, counseling, assistance, and advocacy, for battered women and their children and for runaway and homeless youth; low-cost mental health services; in-home therapy and family supportive services; youth mentoring and anti-violence

programs; parenting, life skills and anger management classes; foster youth services; and a wide range of other educational and direct service programs since 1973. Helpline Interface provides countywide service, twenty-four hours a day, seven days a week. Helpline Interface provides information and referral services in English and Spanish and has access to an interpreter support for more than 140 languages.

Interface Helpline's budget and financial statements indicate a stable and solvent financial position. It appears that Interface Helpline 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 Interface Helpline'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, Interface Helpline provides its service at no charge to callers and there are no advertisements or commercial sponsorship messages on its lines. Interface Helpline 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 and Spanish. Fifty percent of I&R Specialist are bilingual. Tele-interpreting services are also utilized and are available for 140 languages. Assistance is also available 24 hours through their TTY/TDD for persons with disabilities. Interface Helpline also provides continuous access to resource information via it's website at www.2-1-1ventura.org

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). Interface Helpline'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. Interface Helpline is actively pursuing AIRS-accreditation.

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. Interface Helpline included in its application letters of endorsement from 15 different organizations and agencies in a broad range of health and human service fields including children and family services, employment services, the Red Cross, the United Way, libraries and health care interests.

In processing this 2-1-1 application, Telecommunications Division sought the input of the Ventura 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 Ventura. 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 Ventura County Board of Supervisors for their comments or any input on the application of Interface Helpline of Ventura. The Chairman on behalf of Ventura County Board of Supervisors sent a reply to TD's letter on April 6, 2004 endorsing Interface Helpline to serve as the 2-1-1 providers for Ventura County residents and employees. The Commission values the input of the Ventura 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 Ventura 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 Ventura 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 Interface Helpline 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. Interface Helpline sent its application letter for certification as the 2-1-1 service provider for Ventura County to the Commission on January 2, 2004.
2. One written comment from CAIRS was filed in support of Interface Helpline'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 Chairman of the Ventura County Board of Supervisors sent a letter to the Commission on April 6, 2004, endorsing Interface Helpline to serve as the 2-1-1 provider for Ventura County.
5. TD concludes that Interface Helpline's application meets the requirements established by D. 03-02-029 to use the 211 dialing code.

THEREFORE, IT IS ORDERED that:

1. Interface Helpline is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Ventura County.
2. 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. Any process to contest, revise, or rescind this authority shall provide notice to all affected parties and an opportunity to be heard.
3. If Interface Helpline fails to implement 2-1-1 dialing within a year after the Commission's approval of Interface Helpline 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 Interface Helpline shall lapse so that another I&R provider may apply to offer service in a service territory containing Ventura County.
4. Interface Helpline shall notify the Director of the Telecommunications Division in writing of the date 2-1-1 services 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

WILLIAM AHERN
Executive Director

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