

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Telecommunications Division
Market Structure Branch**

**RESOLUTION T-16844
August 19, 2004**

R E S O L U T I O N

Resolution T-16844. Volunteer Center of Riverside County. Request for certification as the 2-1-1 service provider for Riverside County.

By Letter to Executive Director dated February 24, 2004.

Summary

This resolution grants Volunteer Center of Riverside County, hereinafter referred to as VCRC, the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Riverside 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 February 24, 2004, VCRC sent to the Commission's Executive Director a complete copy of its application letter¹ requesting certification as the 2-1-1 service provider in Riverside County, as well as a copy with information VCRC considered confidential redacted. On the same date, VCRC 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 July 24, 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

VCRC 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 VCRC’s application letter in the Commission Daily Calendars on April 4 through April 15, 2004.

Written comments on VCRC’s application letter were received from California Alliance of Information and Referral Services, Inc. (CAIRS), supporting the request of VCRC to use the 2-1-1 dialing code in Riverside County. The Commission received no formal protest to this application.

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.

The Volunteer Center of Riverside County (VCRC) is a non-profit corporation, incorporated in California in 1966. The VCRC created INFORM Riverside County (Inform) to perform comprehensive information and referral services for the Riverside County area more than 26 years ago. The documents VCRC included to support this categorization are VCRC’s articles of incorporation, including amendments, and letters from the Internal Revenue Service. Its location is 2060 University Ave, Suite 212, Riverside, CA 92507. The contact person is Gary Madden, Director, at (909-686-4402).

VCRC’s application states that the Volunteer Center has been providing comprehensive information and referral services to Riverside County for over two decades. A majority of the Volunteer Center’s staff handling information and referral calls are certified by the Alliance of Information and Referral Systems (“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 VCRC is planning to operate twenty four (24) hours a day, seven days a week. In the interim, the Volunteer Center is also

making operational arrangements with INFO LINE of Los Angeles to handle after-hours calls on weekends and holidays. VCRC I&R staff participate in many coalition and task forces: Mid-County Healthier Communities, Southwest Healthier Communities, Older Adult Task Force, Citizens for a Safer Community, Partnership for Menifee Valley, Eastside Community Health Partnership, Young Parents as Teachers, Southern California 2-1-1 Collaborative, and a host member of the 2-1-1 Steering Committee. VCRC has a broad community support and connections and operates several other programs in cooperation with many county and non-profit agencies. Among these is a long term care ombudsman program, an alternative sentencing program including anger management and Community service options, a lead abatement program for the city of Riverside, a Shared Housing program and a suicide and crisis line.

VCRC's application demonstrates the qualifications necessary to operate as the 2-1-1 entity in Riverside County. In addition, the Volunteer Center's Board of Directors is staffed with a broad range of private and public interests and includes representatives of the City of Riverside Police Department as well as the Fire Department of Riverside County.

VCRC's budget and financial statements indicate a stable and solvent financial position. It appears that VCRC 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 VCRC'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, VCRC provides its service at no charge to callers and there are no advertisements or commercial sponsorship messages on its lines. VCRC states that it has the ability to place ip phones in secure locations or homes after hours where the I&R Specialists can function as if physically at the center. Also VCRC is working with INFO LINE LA to establish coverage for 5PM-8AM and on weekends and holidays during ramp-up if necessary. Currently 67% of VCRC Information and Referral Specialists are bilingual. VCRC also has an agreement with Language-Line, providing a translator/interpreter on an as-needed basis.

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). VCRC'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 established standards.

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. VCRC included in its application letters of endorsement from 15 different organizations and agencies in a broad range of health and human service fields including support from healthcare and child services interests as well as from county government.

In processing this 2-1-1 application, Telecommunications Division considered the input of the Riverside 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 Riverside 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 Second District Supervisor of the Riverside County Board of Supervisors sent a letter dated December 1, 2003 endorsing VCRC to serve as the 2-1-1 provider for Riverside County residents and employees. The Commission values the input of the Riverside 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 Riverside 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 Riverside 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 VCRC 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. Volunteer Center of Riverside County (VCRC) sent its application letter for certification as the 2-1-1 service provider for Riverside County to the Commission on February 24, 2004.
2. One written comment from CAIRS was filed in support of VCRC's application. The Commission received no formal protest to this 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 Second District Supervisor of the Riverside County Board of Supervisors wrote a letter to the Commission dated December 1, 2003, endorsing VCRC to serve as the 2-1-1 provider for Riverside County.
5. TD concludes that VCRC'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. Volunteer Center of Riverside County (VCRC) is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Riverside 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 VCRC fails to implement 2-1-1 dialing within a year after the Commission's approval of VCRC 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 VCRC shall lapse so that another I&R provider may apply to offer service in a service territory containing Riverside County.

4. VCRC 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 August 19, 2004 adopted this Resolution. The following Commissioners approved it:

/s/ STEVE LARSON

STEVE LARSON
Executive Director

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