

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Telecommunications Division
Market Structure Branch**

**RESOLUTION T-17063
September 7, 2006**

R E S O L U T I O N

Resolution T-17063. United Way Silicon Valley. Request for certification as the 2-1-1 service provider for Santa Clara County.

By Letter to Executive Director filed on June 19, 2006.

Summary

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

By Letter to the Commission's Executive Director received on June 19, 2006, United Way Silicon Valley (UWSV) filed a complete copy of its application letter¹ requesting certification as the 2-1-1 service provider in Santa Clara County, as well as a copy with information UWSV considered confidential redacted. On the same date, UWSV sent to SBC Communications now AT&T and Verizon Communications as well as 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 now AT&T or Verizon or submit their own cost support information. This filing shall follow that of AT&T 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

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.

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

UWSV states that it mailed a copy of its application letter to SBC Communications now AT&T and Verizon 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 UWSV’s application letter in the Commission Daily Calendar on June 29, 2006 through July 12, 2006. In response to UWSV’s application letter, the California Alliance of Information and Referral Services, Inc. (CAIRS) submitted written comments supporting the request of UWSV to use the 2-1-1 dialing code in Santa Clara 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, its structure, its background, and experience.

United Way Silicon Valley (UWSV), an independent local affiliate of United Way of America, was established in 1992 as a non-profit charitable organization incorporated in the State of California in 1997. The documents included to support this categorization are its articles of incorporation, including By-laws, and letters from the Internal Revenue Service. Its location is 1922 The Alameda, San Jose, CA 95126-1430. The contact person is Mark Walker, President and CEO at (408) 345-4302 and email at mark.walker@uwsv.org.

UWSV’s application states that it has been providing comprehensive information and referral services to Santa Clara for 30 years and has a community-wide planning effort to bring 2-1-1 service to their area for the past 4 years. A trained Information and Referral Specialist is currently available from 8.30 a.m-4.30 p.m. Monday through Friday to assist callers. Upon implementing 2-1-1 dialing, UWSV will assist callers 24 hours a day, seven days a week with the assistance of its contactor, 2-1-1 Ventura.

UWSV's request demonstrates that its management has significant expertise in providing information and referral service as well as broad support from CAIRS. CAIRS has worked closely with representatives of UWSV in developing statewide 2-1-1 planning efforts as well as the development of professional information and referral services throughout California. Of note, Mark Walker, president and CEO of UWSV has been the Co-chair of the 2-1-1 California Partnership leadership team responsible for guiding the development of the statewide 2-1-1 business plan.

UWSV has provided a 3-year budget and financial statements which indicate a stable and solvent financial position. It appears that UWSV 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 UWSV Application indicates that it does not and will not receive fees from referred organizations nor charge providers to be listed in its database. UWSV states that upon implementing 2-1-1 dialing, it will assist callers 24 hours a day, seven days a week to all callers regardless of language and disability through a combination of in-house 2-1-1 services and a linkage to another organization. 2-1-1 services will be provided at UWSV Monday through Friday. This service will be supplemented through a contract with 2-1-1 Ventura operated by Interface Children Family Services to assist overflow 2-1-1 callers Monday through Friday during business hours, and all 2-1-1 callers after hours on evenings and weekends. 211 Ventura will have access to the community resource database for Santa Clara County. Both agencies will meet AIRS service delivery standards. The UWSV plans to staff bi-lingual English/Spanish I&R specialists during operation hours and currently has staff to serve callers in Spanish. UWSV will contract with 211 Ventura to provide additional interpretation/translation services for 2-1-1 callers. TTY/TDD services will be provided by 211 Ventura whose staff is trained to utilize the assistive device to assist callers.

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). UWSV's plan to combine their technological expertise in managing the data base and website components with the telephone I&R expertise of 2-1-1 Ventura (Interface Children & Family Services) is an innovative approach and will 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. UWSV'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 letters of endorsement from organizations and agencies that are stakeholders in the health and human services network in its community. UWSV included in its application letters of endorsement from 15 different organizations and agencies in a broad range of health and human service fields throughout Santa Clara County. These endorsements demonstrate broad community support, including support from a wide spectrum of health and human service agencies.

In processing this 2-1-1 application, Telecommunications Division considered the input of the Santa Clara 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 Clara 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 Chairperson Supervisor Fourth District, James T. Beall, Jr. on behalf of Santa Clara County Board of Supervisors sent a letter on April 10, 2006 endorsing UWSV's application to serve as the 2-1-1 provider of Santa Clara County residents and employees. The Commission values the input of the Santa Clara 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 Clara 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 Clara 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 UWSV of Santa Clara County 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. United Way Silicon Valley (UWSV) sent its application letter for certification as the 2-1-1 service provider for Santa Clara County to the Commission on June 19, 2006.
2. CAIRS submitted written comments in support of UWSV application. No other comments were submitted.
3. UWSV'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. The Chairperson Supervisor Fourth District, James T. Beall, Jr. on behalf of Santa Clara County Board of Supervisor sent a letter to the Commission on April 10, 2006, endorsing UWSV to serve as the 2-1-1 provider for Santa Clara County.
5. The Telecommunications Division concludes that UWSV'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 Silicon Valley (UWSV) 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 Clara 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.

