

**Mailing Date: March 20, 2007**

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

**Telecommunications Division  
Market Structure Branch**

**RESOLUTION T-17079  
March 15, 2007**

**R E S O L U T I O N**

Resolution T-17079. HELPLINK-United Way Community Information Center . Request for certification as the 2-1-1 service provider for Napa County.

By Letter to Executive Director filed on December 27, 2006.

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**Summary**

This resolution grants HELPLINK- United Way Community Information Center, 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 Napa 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 December 27, 2006, HELPLINK-United Way Community Information Center, filed a complete copy of its application letter<sup>1</sup> requesting certification as the 2-1-1 service provider in Napa County, as well as a copy with information HELPLINK considered confidential redacted. On the same date, the HELPLINK 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 filling 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 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

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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.

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."

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 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 HELPLINK's application letter in the Commission Daily Calendar on January 8, 2007 through January 18, 2007. In response to HELPLINK's application letter, the California Alliance of Information and Referral Services, Inc. (CAIRS) submitted written comments supporting the request of HELPLINK to use the 2-1-1 dialing code in Napa 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.

HELPLINK is a non profit organization originally created as a department of the United Way of the Bay Area (UWBA) in 1975. HELPLINK became part of the Northern California Council for the community when it was established as a separate independent 501(c) (3) in 1993. In early 2005, HELPLINK returned to the United Way of the Bay Area, where it is a department of that organization: United Way HELPLINK: Community Information Center. 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 221 Main Street, Suite 300, San Francisco, CA 94105. The contact person is Edward A. Schoenberger, Director at (415) 808-4304 and

email at [eschoenberger@uwba.org](mailto:eschoenberger@uwba.org). HELPLINK's application states that it has a long history of providing information and referrals (I&R) to many types of callers including low-income parents, immigrants, laid-off workers, homeless and more for Napa County. Over the years it has served as the comprehensive information and referral program in the counties of San Francisco, Marin, San Mateo, Napa, Solano, San Francisco, Contra Costa and Marin. HELPLINK also states that throughout its history it has consistently served a physically large and demographically diverse population. The United Way of the Bay Area which promotes HELPLINK and 2-1-1 programs throughout its service population serves seven counties (Napa, Solano, San Mateo, San Francisco, Alameda, Contra Costa and Marin. HELPLINK, the Napa Superior Court and the Napa Valley Coalition of Agencies are working together to ensure that the 2-1-1 Call Center will have the most relevant and up to date information for Napa County by utilizing the Court's agency service database, which is also available online to the public through the search tool Napahelp.info. HELPLINK has been active in disaster preparedness also. HELPLINK also operates several specialized I&R programs, which include: The Earned Income Tax Credit Program, The Immigration Assistance Line (IAL), The Homeless Prevention Program, The Self- Help Program, and the Holiday Program.

HELPLINK's application indicates that staff and key managers have many years of experience to be leaders in I&R and community building in the Bay Area. Moreover, as a member of the CAIRS Leadership and Planning body, HELPLINK's Executive Director has participated in statewide planning and training for 2-1-1 standards, protocols and program services.

HELPLINK has provided a 3-year budget. HELPLINK's budget and financial statements indicate a stable and solvent financial position. HELPLINK indicates that since it already operates as an I&R service provider that serves counties throughout the Bay Area therefore HELPLINK will be able to provide the service in Napa County at a lower cost as additional counties come on board.

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's information and referrals services have been provided free of charge to callers and will remain that way upon implementation of 2-1-1. HELPLINK 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 by live and trained I&R Specialists. HELPLINK currently provides its I&R services in English, Spanish, Cantonese and Mandarin and contracts with Tele-Interpreters, a telephone interpretation service that

allows access to 150+ languages. Assistance is also available through out TTY/TDD for persons with disabilities.

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 has internal protocols to ensure all calls are handled consistent with guidelines developed 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 Commission's 03-02-029. 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 letters of endorsement from organizations and agencies that are stakeholders in the health and human services network in its community. HELPLINK has demonstrated a high level of local community support from key government, non-profit, and business leaders who endorsed their application. HELPLINK included in its application letters of endorsement from 18 different organizations and agencies in a broad range of health and human service fields throughout Napa County.

In processing this 2-1-1 application, Telecommunications Division (TD) considered the input of the Napa 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 Napa 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. Supervisor Harold Moskowitz, Chair on behalf of Napa County Board of Supervisors sent a letter on February 16, 2007 endorsing HELPLINK's application to serve as the 2-1-1 provider of Napa County residents and employees. The Commission values the input of the Napa 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 Napa 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 Napa 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 of Napa 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), and Rule 14.6 (c) (2) of the Commission's Rules of Practice and Procedure, the otherwise applicable 30-day period for public review and comment is being waived.

## **Findings**

1. HELPLINK-United Way Community Information Center, hereinafter referred to as HELPLINK sent its application letter for certification as the 2-1-1 service provider for Napa County to the Commission on December 27, 2006.
2. CAIRS submitted written comments in support of HELPLINK application. No other comments were submitted.
3. HELPLINK'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 Chairman of the Napa County Board of Supervisor sent a letter to the Commission on February 16, 2007, endorsing HELPLINK to serve as the 2-1-1 provider for Napa County.

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-United Way Community Information Center is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Napa 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 cannot 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 Napa 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 March 15, 2007 adopted this Resolution. The following Commissioners approved it:

/s/ STEVE LARSON

STEVE LARSON  
Executive Director

MICHAEL R. PEEVEY  
President  
DIAN M. GRUENEICH  
JOHN A. BOHN  
RACHELLE B. CHONG  
TIMOTHY A. SIMON  
Commissioners