

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

**Communications Division  
Consumer Programs Branch**

**RESOLUTION T-17645  
February 21, 2019**

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

Resolution T-17645. County of El Dorado. Request for authority to serve as the 2-1-1 service provider for El Dorado County. By Letter to Executive Director filed on August 8, 2018.

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**SUMMARY**

This resolution grants the County of El Dorado the authority to use the 2-1-1 abbreviated dialing code to provide information and referral services to all of El Dorado County. This grant of authority is in the public interest and will promote the public safety of El Dorado County, and conforms to the Federal Communications Commission delegation of authority to the states to implement 2-1-1 dialing. The County of El Dorado shall introduce 2-1-1 service in El Dorado County within one year of this grant of authority.

**BACKGROUND**

2-1-1 is the telephone number used to access non-emergency community information and referral (I&R) providers. Upon dialing 2-1-1, a caller in need is routed to a call center, where a referral specialist will refer or connect the caller to the appropriate agencies that will provide the needed social services, such as housing assistance, programs to assist with utility bills, food assistance, elderly or child care, and many other non-emergency information not currently addressed by either 9-1-1 or 3-1-1 services.

On July 31, 2000, the Federal Communications Commission (FCC) issued its *N11 Third Report and Order* assigning the 2-1-1 code as the national abbreviated dialing code for

information and referral services.<sup>1</sup> The FCC noted that the assignment is in the public interest and recognized that the public need for social service could be met through the implementation of a 2-1-1 dialing program. The FCC encouraged the states to implement 2-1-1 programs<sup>2</sup> and directed that "states will be allowed to continue to make local [N11] assignments that do not conflict with [FCC] national assignments."<sup>3</sup>

On January 23, 2002, the California Public Utilities Commission (CPUC or Commission) instituted Rulemaking (R.) 02-01-025 to implement 2-1-1 dialing in the State of California. In Decision (D.) 03-02-029, the Commission adopted the regulatory policies and procedures needed to implement 2-1-1 dialing.<sup>4</sup>

On August 8, 2018, the Commission's Executive Director received via postal mail the application letter (application)<sup>5</sup> submitted by the County of El Dorado, requesting certification as the 2-1-1 service provider in El Dorado County.

On August 2, 2018, the County of El Dorado sent a copy of its application via email to SBC Communications, now AT&T, as well as to the service list for R.02-01-025, which includes the appropriate incumbent local exchange carriers.

The Communications Division (CD or staff) published notice of the County of El Dorado's application in the Commission Daily Calendar from August 9, 2018 through August 13, 2018. The Commission received no comments in response to the notice.

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<sup>1</sup> *Third Report and Order and Order on Reconsideration*, FCC 00-256, CC Docket 92-105, released July 31, 2000 ("N11 Third Report and Order")

<sup>2</sup> *N11 Third Report and Order*, ¶21

<sup>3</sup> *N11 Third Report and Order*, ¶43

<sup>4</sup> D. 03-02-029 establishes 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 2-1-1 callers. The decision directs I&R providers seeking authority to provide 2-1-1 service to submit to the CPUC Executive Director a letter containing the information specified in the decision's Appendix A, which sets forth the standards and application procedures that ensure the selection of qualified I&R providers. The decision requires all local exchange carriers to submit advice letters by the appropriate deadlines set forth in the decision to provide 2-1-1 switch translation services at reasonable rates in the territories that will be served by I&R providers and to offer the services within six months of the advice letter filing. I&R providers must obtain an 8YY number that payphone operators and competitive local exchange carriers may use to route 2-1-1 calls. Additionally, I&R providers must implement 2-1-1 service within one year of the Commission's grant of authority; failure to do will result in the Commission's rescission of the authority. D.03-02-029, February 13, 2003, [http://docs.cpuc.ca.gov/word\\_pdf/FINAL\\_DECISION/23645.pdf](http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/23645.pdf)

<sup>5</sup> The terms "application letter", "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.

On August 28, 2018, CD sent a data request to the County of El Dorado, seeking further information regarding its application. On September 11, 2018, the County of El Dorado provided CD with its response to the data request.

## **DISCUSSION**

### **County of El Dorado's Application**

The application for 2-1-1 service is organized into four sections. The County of El Dorado provided information for each of the four sections as discussed below.

#### *Section 1 Organizational Structure, Background and Experience*

El Dorado County currently does not have 2-1-1 service. The County of El Dorado is a county government in the State of California.<sup>6</sup> El Dorado County is located in east-central California and is situated almost entirely within the Sierra Nevada mixed conifer forest, oak woodlands and areas of heavy chaparral vegetation.<sup>7</sup> The California Department of Forestry and Fire Protection (Cal Fire)'s fire hazard severity zones maps show large areas of El Dorado County are in high or very high fire hazard zones.<sup>8</sup>

The County of El Dorado Health and Human Service Agency (HHSA) submitted the application, along with supporting documentation, which includes an audited financial statement and a proposed three-year budget that demonstrate that the County of El Dorado is a solvent entity with appropriate budgetary planning to support 2-1-1. The Director of HHSA will oversee the implementation of the El Dorado County 2-1-1 service (2-1-1 El Dorado), and one HHSA staff member will serve as the 2-1-1 community liaison. The County of El Dorado is experienced in providing I&R and currently offers I&R services through many of its departments, such as the Information and Assistance Program offered through the HHSA, which helps seniors and families access social and health services.

The County of El Dorado has contracted with Interface Children and Family Service (Interface) for 2-1-1 call center and database management services. Interface, located in

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<sup>6</sup> El Dorado County was created by the California State Legislature on February 18, 1850. The County of El Dorado has operated under a charter since 1994. [https://www.edcgov.us/Government/Pages/About\\_Us.aspx](https://www.edcgov.us/Government/Pages/About_Us.aspx).

<sup>7</sup> El Dorado County Fire Safe Council, <http://www.edcfiresafe.org/about-the-council/board-information/about-el-dorado-county/>

<sup>8</sup> Cal Fire El Dorado County Fire Hazard Severity Zone Map, [http://www.fire.ca.gov/fire\\_prevention/fhsz\\_maps\\_eldorado](http://www.fire.ca.gov/fire_prevention/fhsz_maps_eldorado)

Ventura County, has served as the 2-1-1 service provider for Ventura County since 2005, and currently supports 16 other California counties<sup>9</sup> via contracts in various aspects of 2-1-1 service. Interface provides a broad range of I&R services and systems such as the Ventura County Homeless Management System, a database used to assist with the allocation of services and resources for the homeless population.

### *Section 2 – Terms and Conditions of Service*

The County of El Dorado states that it does not and will not accept fees from referred organizations in return for referrals, and that it will provide 2-1-1 service free of charge to callers with no commercial interruptions. Interface will answer each 2-1-1 call with live help 24 hours a day, 7 days a week, regardless of language or disability. Interface is staffed with bilingual 2-1-1 personnel to assist non-English speaking callers. Translation services are available to provide live phone translation in over 150 languages. Interface uses the Internet Protocol Teletype (TTY) system to provide TTY access for deaf and disabled callers.<sup>10</sup>

### *Section 3 – Alliance of Information and Referral Services Standards*

The County of El Dorado's application describes the following 2-1-1 policies that conform to the professional standards established by the Alliance of Information and Referral Services (AIRS)<sup>11</sup> for the delivery of I&R and 2-1-1 services:

- Maintain internal protocols ensuring callers are assessed and referred to the needed resources, including a threat assessment protocol directing I&R staff to transfer callers in crisis directly to 9-1-1 or the local crisis centers.
- Update resource database annually to ensure it is comprehensive, accurate and up-to-date with local, state and national services.
- Secure call center space with locked entrance, store client files in locked cabinets, password-protect computers, and restrict database access to I&R personnel only to ensure client confidentiality.

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<sup>9</sup> Interface supports the following 16 California counties through contracts: Santa Barbara, Monterey, San Luis Obispo, Shasta, Tehama, San Francisco, San Mateo, Solano, Santa Cruz, Marin, Napa, San Benito, Santa Clara, San Joaquin, Fresno and Orange.

<sup>10</sup> Interface also uses a system that converts analog TTY calls into a digital interface.

<sup>11</sup> AIRS is the national professional membership organization of the I&R providers. AIRS' guidelines are the basis for the service delivery standards associated with use of the 2-1-1 dialing code as specified by D. 03-02-029.

D.03-02-029, February 13, 2003, [http://docs.cpuc.ca.gov/word\\_pdf/FINAL\\_DECISION/23645.pdf](http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/23645.pdf)

Resolution T-17645  
CD/LEU

- Collect data on 2-1-1 calls received, referrals made and/or lack of available referrals, aggregate data, and produce reports for internal analysis and community planning.
- Maintain disaster plans and a pre-disaster resource database containing ongoing public safety services, and ensure 2-1-1 service is available during disasters.
- Develop partnerships with other 2-1-1 and I&R providers, train I&R staff on all areas of I&R and 2-1-1, and increase public awareness of 2-1-1.

These policies indicate that the County of El Dorado will adhere to the AIRS standards for delivery of 2-1-1 service.

*Section 4 – Documentation of Community Support*

On March 13, 2018, the County of El Dorado Board of Supervisors approved the 2-1-1 service in the County of El Dorado and authorized the contract with Interface for call center and database services. The County of El Dorado received eight endorsement letters, six from local organizations in the fields of health and human services and two from local elected officials. Wendy Thomas, Mayor of the City of Placerville, on July 2, 2018, and William Schultz, Recorder Clerk for Registrar of Voters and Director of Veterans Affairs, on June 29, 2018, endorsed the County of El Dorado as the organization that is best qualified as the 2-1-1 provider in El Dorado County. The California of Alliance of Information and Referral Services also submitted a letter on December 4, 2018 to support the County of El Dorado's request for authority to provide 2-1-1 service. These endorsements indicate support from the community and local governments for the County of El Dorado as the local 2-1-1 provider.

In processing the County of El Dorado's 2-1-1 application, CD considered in particular the inputs of local governments in El Dorado County because they oversee the operations of numerous agencies and programs in the fields of health and human services within El Dorado County, and therefore, are best equipped to evaluate whether an I&R provider is best fit to provide 2-1-1 service in El Dorado County. CD values the inputs of the local officials and take official notice of their actions.

**Safety Considerations**

The County of El Dorado will integrate 2-1-1 service into El Dorado County's emergency public information system to disseminate public information during disasters. During a disaster, the County of El Dorado will work with Interface under the direction of the County of El Dorado Office of Emergency Services to disseminate critical public information, such as information on evacuations, shelters, road closures, utility outages,

etc. 2-1-1 El Dorado will have a direct, positive public safety impact on El Dorado County residents during emergencies and disasters.

### **Implementation of 2-1-1 Calling**

The County of El Dorado indicates that upon receiving the authority from the Commission to implement 2-1-1 service, it will negotiate with telecommunications service providers serving El Dorado County to establish 2-1-1 switch translation services. The County of El Dorado also notes that, in accordance with Ordering Paragraph 5 of D. 03-02-029,<sup>12</sup> it has obtained a toll free 8YY number that competitive local exchange carriers may use to route 2-1-1 calls.

### **Staff Conclusions and Recommendations**

CD concludes that the County of El Dorado's application for authority to provide 2-1-1 service to El Dorado County meets the requirements set forth in D.03-02-029. CD finds that granting the authority requested is in the public interest as 2-1-1 will promote the public safety of El Dorado County, and conforms to the FCC's delegation of authority to the states to implement 2-1-1 programs.<sup>13</sup> Therefore, CD recommends that the Commission grant the County of El Dorado's request to use the 2-1-1 dialing code to provide I&R services.

### **Terms and Conditions of the Authority**

Decision 03-02-029 requires that an I&R provider that is granted authority must provide 2-1-1 service within one year of the Commission's granting of the authority. Therefore, we will require the County of El Dorado to implement 2-1-1 service within one year from the date of this resolution. El Dorado County's failure to do so would result in rescission of the authority the Commission is granting here. El Dorado county should provide to the Director of CD written notification of the date 2-1-1 service is first rendered to the public within five business days after the service begins.

The authority granted by this resolution is not transferable except upon Commission approval. Should the County of El Dorado Board of Supervisors wishes to rescind, reassign, or modify its authority to use 2-1-1 dialing, it can provide a letter to the Commission's Executive Director. We are requiring the County of El Dorado to seek approval from the Commission via a letter to the Director of CD 30 days in advance of any changes to the geographic area served, any change to the vendor for call center

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<sup>12</sup> D.03-02-029, Ordering Paragraph 5 states, "Those implementing 2-1-1 service shall obtain an 8YY phone number that payphone operators and competitive local exchange carriers may use to direct calls to the I&R provider."

<sup>13</sup> *N11 Third Report and Order*

and/or database management services, or if the ability to continue as a 2-1-1 service provider in El Dorado County changes.

Decision 03-02-029 does not require renewal of the authority granted to an I&R provider to provide 2-1-1 service or recertification of the I&R provider to whom the authority was granted. However, it is important that the Commission be kept informed and updated regularly on the services provided under the authority granted. Therefore, we will require the County of El Dorado to report to the Director of CD via email at [CDcompliance@cpuc.ca.gov](mailto:CDcompliance@cpuc.ca.gov) by March 1 of each calendar year the following information:

- a) Name of organization providing 2-1-1 service to El Dorado County and contact information (include person to contact)
- b) Geographic area(s) served
- c) Name of vendor providing 2-1-1 call center services and contact information
- d) Name of vendor providing resource database services and contact information
- e) Name of vendor providing after-hour service and contact information
- f) Summary (not to exceed one page) of the 2-1-1 services provided during the previous calendar year, with specific mentions of all declared and non-declared disasters and emergencies during which 2-1-1 was activated.

### **COMMENTS**

In compliance with Public Utilities Code § 311(g)(1), the Commission emailed a notice letter on January 22, 2019, informing the parties on the R 02-01-025 service list of the availability of this resolution for public comments at the Commission's website [www.cpuc.ca.gov](http://www.cpuc.ca.gov). The notice letter also informed parties that the final confirmed resolution adopted by the Commission will be posted and available at the same website. No comments were filed.

### **FINDINGS**

1. On August 8, 2018, the Commission's Executive Director received via postal mail the application letter (application) submitted by the County of El Dorado, requesting certification as the 2-1-1 service provider in El Dorado County. On August 2, 2018, the County of El Dorado sent a copy of its application via email to SBC Communications, now AT&T, as well as to the service list for Rulemaking 02-01-025, which includes the appropriate incumbent local exchange carriers.
2. The County of El Dorado is a county government in the State of California.
3. El Dorado County currently does not have 2-1-1 service.

4. The County of El Dorado Health and Human Services Agency will oversee the implementation of the El Dorado County 2-1-1 service and has contracted with Interface Children and Family Service (Interface) for 2-1-1 call center and database management services. Both the County of El Dorado and Interface are experienced in providing information and referral (I&R) services.
5. On March 13, 2018, the County of El Dorado Board of Supervisors approved the 2-1-1 service in the County of El Dorado and authorized the contract with Interface for call center and database management services. The County of El Dorado received support from local health and social services organizations and local elected officials for its request to serve as the local 2-1-1 provider.
6. The County of El Dorado's application meets the requirements set forth in Decision 03-02-029.
7. Granting the County of El Dorado's request to use the 2-1-1 dialing code to provide I&R services is in the public interest as 2-1-1 will promote the public safety of El Dorado County and conforms to the Federal Communications Commission's delegation of authority to the states to implement 2-1-1 programs.
8. The authority granted to the County of El Dorado to provide 2-1-1 service is not transferrable except upon Commission approval.
9. The County of El Dorado should be required to notify the Commission via a letter to the Director of Communications Division 30 days in advance of any changes to the geographic area served, vendor for call center and/or database management services, or the ability to continue as a 2-1-1 service provider in El Dorado County.
21. The County of El Dorado should be required to report to the Director of Communications Division by March 1 of each calendar year information about the 2-1-1 service.
22. The County of El Dorado must implement 2-1-1 service in El Dorado County within one year of the date of this resolution pursuant to Decision 03-02-029.

**THEREFORE, IT IS ORDERED that:**

1. The County of El Dorado is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral services to El Dorado County.
2. The County of El Dorado shall not transfer the authority granted except upon Commission approval.
3. The County of El Dorado should be required to notify the Commission via a letter to the Director of Communications Division 30 days in advance of any changes to the geographic area served, vendor for call center and/or database management services, or the ability to continue as a 2-1-1 service provider in El Dorado County.
4. The County of El Dorado shall be required to report to the Director of Communications Division via email at [CDcompliance@cpuc.ca.gov](mailto:CDcompliance@cpuc.ca.gov) by March 1 of each calendar year the following information:
  - a) Name of organization providing 2-1-1 service to El Dorado County and contact information (include person to contact)
  - b) Geographic area(s) served
  - c) Name of vendor providing 2-1-1 call center services and contact information
  - d) Name of vendor providing resource database services and contact information
  - e) Name of vendor providing after-hour service and contact information
  - f) Summary (not to exceed one page) of the 2-1-1 services provided during the calendar year, with specific mentions of all declared and non-declared disasters and emergencies during which 2-1-1 was activated.
4. The County of El Dorado shall introduce 2-1-1 service in El Dorado County within one year of the date of this Resolution.
5. The County of El Dorado shall notify the Director of the Communications Division in writing of the date 2-1-1 service is first rendered to the public, within five business days after service begins.

Resolution T-17645  
CD/LEU

This Resolution is effective today.

I hereby certify that the California Public Utilities Commission at its regular meeting on February 21, 2019 adopted this Resolution. The following Commissioners approved it:

/s/ ALICE STEBBINS

Alice Stebbins  
Executive Director

MICHAEL PICKER  
President

LIANE M. RANDOLPH  
MARTHA GUZMAN ACEVES  
CLIFFORD RECHTSCHAFFEN  
GENEVIEVE SHIROMA  
Commissioners