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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Commission Investigation )  
Into the Allocation of Abbreviated Dialing )  
Arrangements, Such as N-1-1. )**

**Case No. 93-1799-TP-COI**

93-1799-TP-COI  
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**APPLICATION OF THE  
OHIO COUNCIL OF INFORMATION  
& REFERRAL PROVIDERS AND  
THE 211 OHIO COLLABORATIVE FOR  
ASSIGNMENT OF ABBREVIATED  
DIALING ARRANGEMENT**

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The Ohio Council of Information & Referral Providers ("OCIRP") and the 211 Ohio Collaborative ("211 Ohio") [hereinafter collectively referred to as "Joint Applicants"], through their undersigned counsel, hereby apply with the Commission for assignment of the 211 telephone dialing code for use by the Joint Applicants with their "211 Ohio" human services information and referral service, first in the central, northeast and western areas of the state and eventually on a statewide basis. The allocation of 211 for the purposes of providing persons in need with an easy to remember access to critical community service information will provide an important public service and is part of a nationwide initiative for assignment of the 211 dialing code. In support of this application, the Joint Applicants state as follows:

**I. DESCRIPTION OF THE APPLICANTS AND THE INFORMATION AND REFERRAL SERVICES PROVIDED.**

OCIRP is a non-profit statewide organization supporting 35 member information and referral agencies ("I&R" agencies) whose primary business is connecting people to valuable health

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and human services. OCIRP has been in existence for 25 years to serve the needs of its membership. Similarly, the 211 Ohio Collaborative is comprised of member information and referral providers throughout Ohio that are specifically concerned about people's access to health and human service information.

Ohio has one of the largest number of I&R providers in the country, as well as some of the oldest. Several of the Ohio I&Rs have been in business for almost 40 years. Most of the large Ohio cities in Ohio, such as Columbus, Dayton, Cincinnati and Akron, have comprehensive information and referral services which operate 24 hours a day. Three of the largest I&Rs, in Columbus, Akron and Dayton, have applied for accreditation by the Alliance of Information and Referral Systems (AIRS). In addition, most of Ohio's 88 counties have some form of I&R provided by either government or United Way funding.

The mission of the Joint Applicants is to promote high standards of professionalism in the delivery of information, referral and hotline/help services through education, training and networking. I&R agencies currently providing community resource services on a local basis are presented daily with requests for assistance from individuals facing serious threats to life, health and mental well-being. Problems and issues for which residents seek assistance include substance abuse, domestic violence, financial, legal and fuel assistance, prenatal health and home care, hospice services, adolescent activities, educational programs, child care solution, family counseling, elder services, support groups, housing and crisis intervention. With the advent of federal and state welfare-to-work initiatives, there has been an increased need for community support services such as transitional support services, employment services, child care, transportation and job training. Community I&Rs provide a critical safety net to individuals and

families in crisis and those struggling with ongoing problems, as reflected by the number of calls currently being received by these services. For example, calls to Info Line, Inc. in Akron during 1998 totaled 75,383 referral calls and 13,144 child care calls. Calling statistics from other referral agencies include Geauga United Way - 9,000 calls; the Library program- 6,000 calls; Ohio Child Care Resource and Referral Association , 43,533 calls; HelpLine in Delaware, Ohio-9,000 calls; Ashtabula County Community Action- 10,000 calls annually; United Seniors of Athens County, Inc. - 250 calls; United Way LINK of Lake County- 7,500 calls and HelpLink in Dayton answered 61,000 calls in 1998. Other calling statistics from agencies around the state are Firstlink in Columbus, which receives roughly 200,000 calls per year with an additional 40,000 for the Help Me Grow line; and Center for Alternative Resources in Newark, Ohio which received 14,541 in the last 12 month period. It should be noted that not all of these agencies are in operation for 24 hours.

Although I&R agencies are committed to bringing community service information to those persons in need of it, this information is useful only if it reaches the people who need it in a timely and effective manner. Information has no value if the people who need and could benefit from it are unaware that it exists. As the search for information is often the first step in service delivery, any barrier that prevents access to health and human service information precludes access to the full range of programs provided in Ohio communities. For this reason, community service organizations and I&Rs have sought to provide a uniform access number so that residents can access the information which they require without struggling through hundreds of telephone listings and making many frustrating calls. In 1997, United Way of Metropolitan Atlanta successfully established a local 211 project (United Way 211). Since then, they have helped over

250,000 callers needing information about resources in their community.

In light of the success of this project, United Way of America and AIRS have formed a National 211 Partnership so that this valuable service can be offered throughout the country. In May 1998, a collaborative of I&R providers filed a petition with the FCC to designate 211 as the universal access number for community services information (*In the Matter of Alliance of Information and Referral Systems, United Way of America, United Way 211, United Way of Connecticut, Florida Alliance of Information & Referral Services, and the Texas I&R Network Petition for Assignment of 211 Dialing Code for Use by the Public to Access Essential Community Resource Services*, CC Docket No. NSD-L- 98-80). The OCIRP joined the National 211 Partnership in May, 1999 and now is leading the effort to implement "211 Ohio" so that consumers will have a simple, easy-to-remember number to call when in need of help or access to human services. For this reason, the OCIRP has filed this application for the assignment of the 211 dialing code for public access to these essential community services.

## **II HISTORY OF COMMISSION'S ASSIGNMENT OF THE 211 DIALING CODE.**

### **A. Jurisdiction of the Commission and Assignment of N-1-1 Codes.**

In its September 4, 1997 Opinion and Order in consolidated cases 93-99-TP-CSS, 93-1171-TP-CSS and 93-1799-TP-CSS, the Commission described the interplay between the FCC, Bellcore and the state commissions in the administration of N-1-1 codes. The Commission noted that prior to the enactment of the Telecommunications Act of 1996 (the Act), Bellcore, as administrator for the North American Numbering Plan (NANP), had issued specific guidelines addressing the use of N-1-1 codes, and that four codes had been assigned for national use: 411

(directory assistance), 611 (repair service), 811 (telephone business office) and 911 (emergency services) [Order, 5]. The remaining N-1-1 codes, along with codes not used locally such as 611 or 811, would be kept available for future assignment.

The Commission went on to state that on February 18, 1997 the FCC issued an order in the docket which it had opened in 1992 regarding the assignment of N-1-1 codes, *In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements*, Docket no. 92-105. With that decision, the FCC determined that, under the Act, the FCC had exclusive jurisdiction over the NANP numbers which apply on a national basis, but that the state commissions, the ILECs and Bellcore would nonetheless be delegated the authority to perform the N-1-1 administration functions that were performed prior to the Act, at least until such time as further action was taken by the FCC. At the same time, the FCC assigned the 311 code on a nationwide basis for non-emergency police services, the 711 code for use in reaching telecommunications relay services (TRS) on a nationwide basis, and determined that LECs could not offer enhanced services using an N-1-1 code unless the LEC offered access to the code on a reasonable, nondiscriminatory basis to competing carriers (Order, 5-6).

Having determined that the jurisdiction to consider requests for assignment of N-1-1 codes not allocated on a national basis had been delegated to it by the FCC, the Commission first considered whether one or more N-1-1 codes should be assigned to commercial enhanced and information services, and it was concluded that:

...N-1-1 service codes are an extremely limited numbering resource which, consequently, should not be assigned to for access to commercial enhanced and informational services. We find, rather, that it should be the policy of this Commission, in exercising its jurisdiction to adopt regulations pertaining to intrastate Ohio usage of N-1-1 codes, to reserve such usage for only broad-based, noncommercial, important public purposes.

(Order, 11)

Having set for the guidelines for assigning N-1-1 codes, the Commission went on to consider the request of the Ohio Department of Transportation (ODOT) to use the 311 code for traffic and travel information (*Id.*).

**B. The Ohio Department of Transportation's Use of 211 for a Pilot Project in Cincinnati.**

The Ohio Department of Transportation (ODOT) originally sought authority for the use of 311 access in the Cincinnati area to ARTIMIS (Advanced Regional Traffic Interactive Management & Information System), a traffic control and traveler information system being developed by ODOT, the Kentucky Transportation Cabinet and several other governmental agencies. The request for the use of the 311 code was based on the June 25, 1995 assignment of the code to the Kentucky Transportation Cabinet for a period of two years from the date of the order. Both Cincinnati Bell Telephone (CBT) and the Ohio Telecommunications Industry Association (OTIA) opposed the allocation of 311 to ODOT because of low public benefit from the use of the code as determined during the two year experimental period.

Prior to the time that a decision was issued in this docket, the Kentucky Transportation Cabinet on August 13, 1997 petitioned the Kentucky Public Service Commission for allocation of the 211 code on a permanent basis for traveler information in the Kentucky portion of the CBT service area, rather than the 311 code originally assigned to the project. On this basis, this Commission concluded that ODOT's request fit within the parameters for the noncommercial, broad-based public use described above, that CBT's and OTIA's oppositions to the assignment should be rejected, and that ODOT should be assigned the 211 code for a two year experimental

period ending on September 4, 1999 (Order, 14-15).

The Commission's decision to use the 2-1-1 code was based partially on the fact that no other use was being made of the code at the time. The Commission further made it clear that ODOT's use of the 211 code was temporary in nature:

In closing, we wish to reiterate that we are not willing to make any permanent assignment of the 2-1-1 service code now, based on the limited record before us. Rather, we are only willing, at this juncture, to establish a two-year pilot use, by ODOT of the 2-1-1 service code. The Commission hereby reserves and, as necessary upon completion of this two-year pilot program, will exercise its discretionary authority to reevaluate the whole question of whether any assignment of 2-1-1 service code should be made, much less the narrower question of how well the public will have been served by ODOT's pilot program. Along the way, we intend to give due consideration to any actions taken by the FCC and/or by the Kentucky Public Service Commission affecting the use of 2-1-1- service code in Ohio and/or Kentucky.

(Order, 15).

The ODOT's initial pilot program was scheduled to expire on September 4, 1999. On August 27, 1999, the ODOT filed a letter with the Commission requesting a 90 day extension of the pilot program so as to permit ODOT to prepare and file a formal request for a one year extension of the program and re-assignment of the 2-1-1 code. The Commission granted ODOT's request by entry dated September 2, 1999.

### **III. THE COMMISSION SHOULD DESIGNATE THE 211 DIALING CODE FOR USE AS AN INFORMATION AND REFERRAL NUMBER IN OHIO.**

#### **A. A Need Exists for An Easily Available Single Point of Access for Persons Needing to Locate Community Resources That Can Provide Assistance.**

The Joint Applicants submit that there is a demonstrated need for an easy to remember, easy to use dialing code that will enable persons in need, perhaps critically so, to be directed to

community resources. Assigning 211 to such services will provide an important adjunct to the codes that the FCC and the Commission have already assigned to address public needs.

"211 Ohio" will be a free 24-hour service so that assistance will be available 365 days a year. Like 911, consumers who call 211 will be immediately forwarded to the local 211 center, which will then direct the call to the appropriate agency. Not-for-profit information and referral service organizations may serve as call centers. The benefits which will be provided by the use of an easy to remember dialing code include having only one number to call to get information about a variety of community services; a reduction in inappropriate 911 calls; an assurance that callers are directed to appropriate agencies and reduced frustration on the part of residents who would otherwise have to make multiple calls.

All 211 call centers will be operated in accordance with the "National Standards for Information and Referral" and/or be accredited by the Alliance of Information and Referral Systems (AIRS) at such time as accreditation is available. All call centers must have Emergency Operations Plans, such as those specified in the National Emergency Response Information Network process, to insure uninterrupted service or an expedient return to service when interruption is unavoidable.

The use of the 211 dialing arrangement provides an efficient and uniform approach to bring together those in need with those willing to lend a helping hand. Assignment of the 211 code to community information and referral services will foster more efficient use of available community resources by providing an easily used and easily remembered point of access for persons in need. Experience with 211 projects in other states has shown that there is no serious dispute as to the need for, and benefits of, establishing the 211 dialing code as a single point of



access to community services. For example, the Atlanta United Way 211 center has been inundated by requests from other communities about how to develop and manage a 211 call center. Implementation of 211 for community access is underway in Texas and 211 is operational in the State of Connecticut. The public utilities commissions in Alabama and North Carolina recently approved the use of 211 for community access to information and referral services, and interest in implementing 211 has been expressed by organizations in California, Florida, Kentucky, Massachusetts, Nebraska, New York, Utah, and Virginia as well.

**B. 211 Provides a Safety Network For Persons In Need That are Not Served by 911, 311 or Local Numbers.**

Many urgent and critical human needs are not addressed by 911 or 311. 911 has been reserved for emergency and life-threatening situations, and 311 is for non-emergency police and governmental services. In setting aside 311 for such purposes, the FCC noted that 911 call centers receive a large percentage of inappropriate non-emergency calls for police services. However, the ability of 311 call centers to provide a comprehensive referral to relevant community information for each caller is limited by the underlying purpose of 311 because the focus of 911/311 is significantly different than that of 211. Effective information and referral requires a level of commitment as well as a focus on community human services that cannot reasonably be expected from local police departments. Unlike 911 or 311, 211 staff persons have, at their fingertips, a comprehensive database of the specific resources available locally to help callers. I&R agents are trained to go beyond assessing caller needs and will take the time and attention to focus on alternatives and broader horizons. Some of these may well lead to early intervention situations, with such positive outcomes as the preservation of families or secure

neighborhoods, basic building blocks of a stable community. In these ways, the 211 referral service complements the 911/311 services.

In addition, individuals needing help or information may be uncomfortable calling a police-operated 311 service. For example, people with substance abuse problems or victims of abuse or suspected abuse may be unwilling to contact law enforcement officials as a first step in seeking help. Furthermore, the approach to 311 call centers is entirely different than the 211 information and referral services. For example, the San Jose, California 311 pilot program is automated, menu driven and does not use live operators. By contrast, I&R staff are human service professionals trained to assess caller need and state of mind, available resources, and then to provide appropriate referrals. Finally, communities wherein the 911 dispatch center is not overburdened with calls may not even consider instituting 311. Thus, 211 could serve to reduce non-emergency calls to 911 while providing a much broader scope and purpose than 311.

Local numbers for community information and referrals are difficult to distinguish from the thousands of other local business and human service numbers. In addition, directory assistance operators are not trained to assess caller need or handle crisis calls. I&R services have promoted local numbers for over 20 years but public awareness of these numbers remains very low. A final consideration with respect to the use of local numbers is that with changes in area codes and numbering assignment procedures, dialing local numbers may involve 10 or 11 digit dialing, which is a further burden on persons in need who are seeking assistance. Eleven digit dialing has recently been proposed by the Commission's task force for the 330 area code.

### **C. The Assignment of 211 As An Access To Community Service Referral**

**Organizations Complies With the Parameters Established By The Commission In Its September 4, 1997 Order.**

As discussed above, the Commission in its September 4, 1997 Order determined that N-1-1 dialing codes were a scarce resource and that they would be reserved only for broad-based, non-commercial, important public purposes. Clearly the allocation of the 211 code to community service I&R agencies would fall within those established parameters. The agencies participating in this effort in Ohio and nationally are not-for-profit I&Rs, child care organizations, agencies on aging, volunteer centers, health and human service organizations and many others, none of which operate for commercial purposes. The use of the 211 three digit dialing code will not only make access to these vital community services easier for all persons in need, especially the more vulnerable population of elderly or illiterate individuals, but also will provide a centralized data bank which will enable these organizations to create a profile of community needs and identify gaps in coverage.

The large I&R agencies located in central, northeast and western Ohio are ready to go online with 211 as soon as this Commission (or the FCC) makes the assignment. The staffing and infrastructure are already in place to handle 211 immediately, although it is anticipated that additional staffing will be required to handle the increased call volume once 211 is marketed. The large I&Rs in cities such as Akron, Columbus, and Dayton, maintain good working relationships with the smaller I&Rs in the outlying communities and therefore it is anticipated that 211 will spread quickly into smaller communities through partnership arrangements.

The assignment of the 211 dialing code to I&R agencies actually fills two public needs: to make access to information easier for individuals in need, and to make it easier for public service

organizations to serve the needs of the community. Thus, the Commission would be doing a great public service by granting this application and assigning the 211 dialing code for information and referral purposes.

#### **IV. THE ODOT PILOT PROJECT AND THE USE OF 211 FOR INFORMATION AND REFERRAL SERVICES CAN CO-EXIST ON A TEMPORARY BASIS.**

On November 22, 1999 the ODOT submitted its application to extend the 211 pilot project in the CBT calling area for another year. Attached to that request is a summary of an ongoing study being conducted by the University of Kentucky which contains information regarding the effectiveness of the use of a three digit dialing code in the Cincinnati/Northern Kentucky area for traffic and travel information.

The information submitted with ODOT's application shows high user satisfaction with the ARTIMIS Traveler Advisory Telephone Service (TATS). It also shows user support for the use of an abbreviated dialing code, and user interest in a nationwide dialing code for obtaining similar information in other locations. The same positive results have been shown for the use of the 211 dialing code for information and referral agencies. When customers are provided with a simple, three digit code for access to important information, in place of a seven, ten or eleven digit telephone number, use of the system increases dramatically and the public purpose is fulfilled.

The Joint Applicants do not wish to debate the merits of the ODOT TATS service or the benefits which it can bring to the driving public. The issue before this Commission is the assignment of the 211 code. The Joint Applicants would note that in 1997, when the 211 code was issued to ODOT in Cincinnati, there were no other parties interested in using that number

with the exception of commercial information providers. There is now a nationwide effort to have 211 assigned to community service organizations, and the use of 211 has been marketed and used extensively in other states, as discussed above.

The information contained in the ODOT application reveals that a similar national effort has been sponsored by the US Department of Transportation for the nationwide assignment of an N-1-1 number for traveler information. However, although the University of Kentucky study found that consumers were very satisfied with the use of an N-1-1 dialing code to obtain information, there is no reason that a different dialing arrangement other than 211, such as 511, 611 or 811, couldn't be assigned for traveler information purposes.

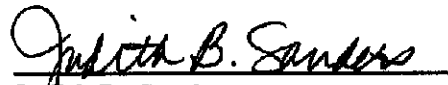
A temporary compromise is possible here. The 211 assignment requested by ODOT is for a one year extension of the pilot program in Cincinnati. The largest I&R organizations which are ready to implement the 211 dialing code are located in areas around Ohio other than Cincinnati. Thus, the Joint Applicants suggest that for the one year period of the ODOT pilot program, the 211 dialing code be assigned by CBT to ODOT for the Cincinnati area and to the I&R agencies described in this application for the other geographic areas in Ohio. During this time period ODOT should be requested to consider the use of a different N-1-1 number for its traffic and travel information program. The Joint Applicants will also have an opportunity to gather Ohio-specific information regarding the use of 211 by persons seeking community service information, and will be able to provide that information to the Commission in support of a statewide assignment of the dialing code.

## **V. CONCLUSION**

The Joint Applicants provide a very important service to individuals in need throughout

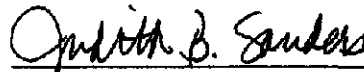
Ohio, access to which is not currently available through any uniform, easy to remember telephone number. The public benefits of making such access available through abbreviated dialing has been shown in other states and the Joint Applicants are anxious to bring this benefit to Ohio as well. The Commission is urged to rule expeditiously on this application, and the Joint Applicants stand ready to provide any additional information necessary for the Commission to issue its decision.

Respectfully submitted,

  
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### **CERTIFICATE OF SERVICE**

I hereby certify that I have forwarded the foregoing Application to the parties listed below, via first-class U.S. mail, postage prepaid, this 3<sup>rd</sup> day of December, 1999.



Judith B. Sanders

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