

BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN

REQUEST FOR DESIGNATION OF THE TELEPHONE NUMBER 211 ) 05-TI-233  
IN WISCONSIN AS A NON-EMERGENCY INFORMATION AND CALL )  
REFERRAL NUMBER RELATED TO HEALTH AND HUMAN SERVICES )  
MATTERS

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**WISCONSIN STATE TELECOMMUNICATIONS ASSOCIATION COMMENTS**

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Wisconsin State Telecommunications Association (WSTA) submits the following comments in response to the Public Service Commission of Wisconsin (Commission) Notice dated October 13, 2003. The notice states that "the Commission seeks comments on the 2-1-1 Wisconsin, Inc., petition. Comments should address the merits of the petition, the adherence of the petition to the 211 standards identified by the Commission, whether the petitioner should be granted the requested 211 designation, whether the governance of 211 as proposed in the petition is reasonable and in the public interest, and whether the Commission can and should transfer the responsibility for administration and designations for use of the 211 dialing code to 2-1-1 Wisconsin, Inc., as proposed."

WSTA is limiting comments to the specifics of providing the requested service. It is not our intent to affirm the appropriateness or merits of the petitioner providing the service. However, we are concerned that some parties will view the requested service as a parallel offering to 911 emergency service and will assume parallel treatment. We would also note that the industry has worked successfully with 211 call centers in four counties to establish this service. Having said that, we ask that if the Commission grants the request, it specify the arrangement as follows:

- The Commission will notify local exchange carriers in sufficient time for the companies to prepare the network.

- The Commission will allow individual carriers to develop their 211 products in a manner they determine to be the most efficient.
- Consistent with the Petition, the information and referral gateway would be operated by the non-profit agency, not the Telephone Companies. Moreover, the gateway operator, not the Telephone Companies, will respond to requests for referrals, and possibly, in an emergency situation, transfer the call directly to a community service organization.
- Local exchange carriers will route calls:
  - to a single call center designated by the petitioner and
  - using a 7 or 10 digit local number or,
  - using an 800 number provided and paid for by the petitioner, particularly for interLATA calls.
- Wisconsin 2-1-1, Inc., will be responsible for costs as established by tariffs or contract. The actual users of the 211 telephone network will be responsible for costs associated with a local call. We do not recommend instituting an additional customer surcharge to support the cost of the service.
- Unlike 911 service, the proposed service does not require the receipt of the phone number from which the call originated or other end user information, such as name or address.
- The Telephone Companies will not be required to allocate customers in any wire center between multiple 211 recipients. As such, there will be overlap between counties. Telephone wire centers do not follow political boundaries. If multiple 211 routes were to be required from wire centers following political boundary, as opposed to telephone exchange boundaries, there could be a substantial cost to provide multiple routes. WSTA proposes that if any disputes arise between 211 call recipients, the Commission determine which call center will receive 211 calls from that particular wire center.

- ◆ 2-1-1 Wisconsin, Inc. will educate potential users that telephone company local charges do apply to 211 calls.
- ◆ WSTA proposes that this petition fall underneath a pilot program on an interim basis similar to the previous Commission order for First Call for Help-LaCrosse.

By requesting the aforementioned specifications, local exchange companies hope to eliminate any expectations that they will provide alternate routing if the line that a call is routed to is busy or no one answers, provide information (such as phone number, name, or address) about callers, list the costs of providing this service on their bills, or be involved in the actual information and referral.

In conclusion we ask that, should the Commission approve the request in this docket, approval be subject to the aforementioned specifications. We appreciate the chance to comment in this docket. I am available to answer questions at 833-8866 Ext. 14.

Respectfully Submitted,

William C. Esbeck  
Executive Director