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211 IMPLEMENTATION

Over the past decade, the PTA has been involved in a series of meetings with representatives from the United Way regarding the implementation of the 211 abbreviated dialing code in Pennsylvania. Additionally, the association has testified before standing committees of the legislature on the benefits and potentially negative side effects of a 211 network in the state.

Our position on the matter has been one of cautious support; favoring the concept of a dialing code for social service referrals and inquiries, but being sensitive to both how the network would be “constructed” and who would pay for it. On the latter point, the PTA testified that it was opposed to adding a 211 surcharge to customer bills in a highly competitive environment where fees and surcharges already inflates customer bills.

Two pieces of legislation have been introduced addressing 211. Senate Bill 559 was referred to the Senate Public Health and Welfare Committee on March 2, 2009 and House Bill 2121 was referred to the House Consumer Affairs Committee on December 4, 2009. Among other things, the legislation establishes the Department of General Services as the agency responsible for contracting with an eligible provider for 211 services in the state and creates a 16-member advisory board to oversee the implementation of 211 service. Senate Bill 559 includes an appropriation of \$10 million for the Department of Health to use in administering the program. To date, neither of these bills have been considered by the respective committees.

From a regulatory standpoint, the United Way filed a Petition in October 2009 requesting the PUC to assign the 211 abbreviated dialing code and designate PA 2-1-1 (an entity created by the United Way and others) as the lead implementing agency. After publication in the Pennsylvania Bulletin and solicitation for comments, the PTA offered its perspectives on January 12, 2010.

The PTA did not oppose the United Way Petition and did not take a position as to whether PA 2-1-1 is the appropriate entity to implement 211. We noted that the PTA Member Companies have an excellent track in implementing abbreviated dialing codes, most recently having done so for 511 (traffic and transportation information) and 811 (One Call). The comments did however highlight several initial concerns/questions regarding the Petition:

- ILECs do not have the capability to provide either time of date or time of week translations as requested.
- In split exchanges, the 211 provider will have to designate how a call is to be routed. i.e. 211 regions may not match-up with ILEC exchanges.

- The PTA will need to know timeframes for implementation.
- An actual customer for the service must be identified.
- PTA Member Companies are not assuming liability for answering 211 calls or the content of the calls. Neither will they be liable for any losses or damages caused by acts or omissions of PA 2-1-1.

The PTA met telephonically with United Way representatives after the Petition filing and suggested in its comments to the PUC that a working group should be established to address the issues mentioned above and others as they may arise.