BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of the Application of the |) | |
|--|---|-----------------------|
| United Way of Greater St. Louis, Inc., for |) | |
| an Order of the Commission Granting it |) | Case No. TO-2007-0312 |
| Authority as an Information and Referral |) | Case No. 10-2007-0312 |
| Provider for Purposes of Obtaining 211 |) | |
| Service |) | |

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

- 1. On February 23, 2007, the United Way of Greater St. Louis, Inc. (UWGSL) filed an Application requesting that it be granted authority as an Information and Referral Provider and be assigned the abbreviated 211 dialing code for the exchanges listed in the Application. On April 17, 2007, UWGSL filed a revised proposed list of exchanges.
- 2. In the attached Memorandum, labeled Appendix A, the Staff states that the Application meets the requirements of the 211 Rule, 4 CSR 240-32.200, and recommends that the Commission grant the Application, as revised. The Staff further recommends that the Commission direct UWGSL to state the status of its AIRS (Alliance of Information and Referral Systems) accreditation in its 211 Rule annual reports.

Respectfully submitted,

/s/ William K. Haas

William K. Haas Deputy General Counsel Missouri Bar No. 28701

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 751-7510 (Telephone)
(573) 751-9285 (Fax)
william.haas@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 25^{th} day of April 2007.

<u>/s/ William K. Haas</u> William K. Haas

MEMORANDUM

To: Missouri Public Service Commission Official Case File

Company Name: United Way of Greater St. Louis, Inc.

Case No. TO-2007-0312

From: Adam McKinnie

Telecommunications Department

Natelle Dietrich / 4-25-07 William Haas / 4-25-07

Utility Operations Division/Date General Counsel's Office/Date

Subject: Recommendation for approval

Date: 4-25-07

Summary:

Staff recommends granting the Application of United Way of Greater St. Louis, Inc. (UWGSL) requesting it be granted "authority as an Information and Referral Provider and assigning it the abbreviated 211 dialing code for the exchanges listed in the application [as amended]". Staff concludes UWGSL and its Application meet the requirements of 4 CSR 240-32.200 (211 Rule) and related requirements of 4 CSR 240-2.060. Notice has been issued and no other party has submitted an application to be a 211 provider in the requested exchanges. While four applications for intervention have been filed by incumbent local exchange carriers (ILECs) and granted by the Commission in the instant case, no intervener has taken a position that the Application should not be approved.

Body:

On February 23rd, 2007, UWGSL filed an "Application" to be designated as an Information and Referral Service (I&R) Provider and to be assigned the abbreviated dialing code 211 for the exchanges and counties listed in the Application as amended. On April 23, 2007, the Direct Testimony of Cheryl Polk was filed by UWGSL in support of the Application.

UWGSL requests to be designated the 211 provider in the counties listed on page 28, paragraph 26 of the Application. The counties listed are all of the Missouri counties not requested by the Heart of America United Way (HUAW) in their 211 Application¹.

The exchanges in which UWGSL requests to be designated the 211 provider are listed in Exhibit 7 attached to the Application. On April 17th, UWGSL filed an amended Exhibit 7 to eliminate some exchanges requested by and insert exchanges inadvertently omitted by UWGSL in their original application. Some of the names listed under the heading "Incumbent Local Exchange Carrier" within

¹ Case AO-2004-0036, In the Matter of the Assignment of the 2-1-1 Abbreviated Dialing Code in the State of Missouri

Exhibit 7 are parent companies or affiliates of the ILEC ("Otelco, Inc." instead of Mid-Missouri Telephone Co. and "CenturyTel" instead of Spectra Communications, Inc., e.g.). Additionally, the Le-Ru Telephone Company exchanges of Stella and Powell are listed as "CenturyTel" exchanges. With the amended exhibit, UWGSL effectively requests to be the 211 provider in all exchanges not served by HAUW except for exchanges that cross state lines (from Iowa to Missouri and from Arkansas to Missouri).

Paragraph 4 CSR 240-32.200(3)(A)5 of the 211 rule requires an entity applying for 211 accreditation to adhere to standards set forth by the Alliance of Information and Referral Systems (AIRS) and to either be already accredited by AIRS or to seek AIRS accreditation. UWGSL states, in paragraph 7, beginning on page 2 of the Application, they are seeking AIRS accreditation and expect the process to be completed by October 2008. Staff recommends the Commission direct UWGSL to state the status of AIRS accreditation in their annual reports already required to be filed under Section 4 CSR 240-32.200(16) of the 211 Rule.

Staff has analyzed the Application and the Direct Testimony of Cheryl Polk and finds that the Application meets the requirements of the 211 Rule. Staff recommends the Application be granted.

Conclusion:

Staff recommends granting the Application of United Way of Greater St. Louis, Inc. (UWGSL) requesting it be granted "authority as an Information and Referral Provider and assigning it the abbreviated 211 dialing code for the exchanges listed in [Revised Exhibit 7]". Through a combination of information provided by UWGSL in its Application as amended, subsequent additional information filed in the instant case, and the Direct Testimony of Cheryl Polk, Staff is satisfied that the requirements of the 211 Rule are met. Staff further recommends the Commission direct UWGSL to provide the status of its AIRS accreditation in the annual reports to be filed under Section 4 CSR 240-32.200(16).

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|---|--|---------------|--------------------------------------|---------------------|--|
| | AFFIDAVIT OF | Adam McKinnie | | | |
| STATE OF MISSOURI |)) ss: | | | | |
| COUNTY OF COLE |) | | | | |
| Adam McKinnie, employage and after being duly accompanying memoran his knowledge and belief | sworn, states that he dum, and that the fac | has partici | pated in preparate true and co | aring the | |
| Subscribed and affir I am commissioned State of Missouri an | as a notary public w | ithin the C | day of (1) ounty of (2) 9-21-1 | ril 2007. llaway | |
| Stay Mer. | TABLE CONTROL | | | | |

MOTARY SEAL OF MISS

SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086

Susan Mandermeyer NOTARY PUBLIC