

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

Order Instituting Investigation to Address
Intrastate Rural Call Completion Issues

I.14-05-012

(Filed May 15, 2014)

COUNTY OF MENDOCINO'S MOTION FOR PARTY STATUS

KATHARINE L. ELLIOTT (Bar # 135253)
Acting County Counsel
501 Low Gap Road, Room 1030
Ukiah, CA 95482
Telephone (707) 234-6885
Facsimile (707) 463-4592
Attorney for the County of Mendocino
E-mail: elliottk@co.mendocino.ca.us

January 20, 2016

I. INTRODUCTION

Pursuant to Rule 1.4 of the Commission's Rules of Practice and Procedure, the County of Mendocino respectfully requests to be granted party status in this proceeding in order to participate and provide information relevant to the proceeding.

II. COUNTY OF MENDOCINO'S INTEREST IN THE PROCEEDING

Rule 1.4(b) provides that a person seeking party status by filing a motion to become a party shall:

- (1) Fully disclose the persons or entities in whose behalf the filing, appearance or motion is made, and the interest of such persons or entities in the proceeding; and
- (2) State the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented.

As noted above, the County of Mendocino, as a small, rural Northern California county, seeks to join this proceeding in order to generally participate, to provide information relevant to the proceeding, and to assure that the specific problems encountered by our county are fully represented to the commission.

The County of Mendocino is a rural county that relies on its Enhanced 911 services. The County has now suffered two major failures in the last one and one-half years (one prior the date of filing and one after the filing). The County of Mendocino is concerned for its citizens who rely on the availability and reliability of emergency 911 services. The interests of our county in seeing the Commission support effective and reliable emergency services are significant and must be represented.

Because the public safety issues related to 911 calls are now added to the scope of this investigation, it is reasonable and timely for the County of Mendocino to join the proceeding at this time. The County of Mendocino intends to participate in any additional steps that may be ordered to develop a record on 911 call completion and access issues, and will provide comments on any proposed decision that may issue. At this time, it has been determined that this proceeding is classified as quasi-legislative and that no hearings are required.

A. Service List Request

The County of Mendocino requests that its formal appearance be entered in this proceeding as follows:

KATHARINE L. ELLIOTT (Bar # 135253)
Acting County Counsel
501 Low Gap Road, Room 1030
Ukiah, CA 95482
Telephone (707) 234-6885
Facsimile (707) 463-4592
Email: cocosupport@co.mendocino.ca.us
Attorney for the County of Mendocino
E-mail: elliottk@co.mendocino.ca.us

Service of notices, orders and other correspondence in this proceeding should be also be directed to County of Mendocino to the address below:

Carmel J. Angelo
County Executive Officer
County of Mendocino
501 Low Gap Road, #1010
Ukiah, CA 95482
Telephone: (707) 463-4441
Facsimile: (707) 463-5649
E-mail: angeloc@co.mendocino.ca.us

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III. CONCLUSION

For the foregoing reasons, the County of Mendocino respectfully requests to be granted party status in this proceeding as it expands to include a review of 911 call completion and access issues.

January 20, 2016

Respectfully submitted,

By: /s/ Carmel J. Angelo
Carmel J. Angelo
County Executive Officer
County of Mendocino
501 Low Gap Road, #1010
Ukiah, CA 95482
Telephone: (707) 463-4441
Facsimile: (707) 463-5649
E-mail: angeloc@co.mendocino.ca.us

By: /s/ Katharine L. Elliott
Katharine L. Elliott
Acting County Counsel
Attorney for the County of Mendocino
501 Low Gap Road, #1030
Ukiah, CA 95482
Telephone: (707) 234-6885
Facsimile: (707) 463-4592
E-mail: elliottk@co.mendocino.ca.us