

June 2, 2020

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Re: *Implementation of the National Suicide Hotline Improvement Act of 2018* (WC Docket No. 18-336)

Dear Ms. Dortch:

On May 29, 2020, representatives from USTelecom met via teleconference with staff from the Wireline Competition Bureau¹ to discuss the *Notice of Proposed Rulemaking* (“*NPRM*”) in the above-captioned docket.² USTelecom and its members expressed their continued support for establishing a single three-digit, nationwide, dialing code for mental health crisis intervention. The recent public health emergency caused by COVID-19 underscores the acute need for mental health resources as demand for the National Suicide Prevention Lifeline and Veterans Crisis Line (“Lifeline”) has increased since March.³ While it is comforting that the Lifeline already provides help to those in need, USTelecom fully understands and supports the Commission’s goal to promote *rapid* access to suicide prevention and mental health crisis intervention through a 3-digit dialing code such as 988.

Since the Commission announced the *NPRM*, USTelecom has engaged with a variety of stakeholders – including the mental health community – to determine an effective, timely, and reliable implementation plan for a national 3-digit dialing code (988) to access national suicide prevention and mental health assistance. Based on these discussions and filings in the record, USTelecom developed a phased-in implementation plan that balances the needs of the mental health community with the technical and operational realities of legacy wireline networks.⁴ The USTelecom phased-in implementation plan would quickly and predictably roll out 988 to 97% of

¹ A complete list of USTelecom representatives and the Wireline Competition Bureau staff who participated in the meeting is attached as Appendix A.

² *Implementation of the National Suicide Hotline Improvement Act of 2018 Notice of Proposed Rulemaking*, WC Docket No. 18-336, Notice of Proposed Rulemaking, FCC 19-128 (Dec. 16, 2019) (*Suicide Hotline NPRM*).

³ See, e.g., 2020 COVID-19 Impact Survey: Behavioral Health Crisis Providers, tbdSolutions, (Apr. 2020), <https://www.tbdsolutions.com/papers-presentations-2/>.

⁴ See, e.g., Letter from American Association of Suicidology *et al.* to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-336, at 2 (filed April 21, 2020) (Mental Health *Ex Parte*) (“Deploying 988 operations across wireless, VoIP, and non-legacy wireline networks would allow significant public access to the hotline. It is crucial that any national crisis hotline be universally accessible, and we urge the FCC to support swift upgrades to legacy wireline switches to complete 988 coverage while ensuring areas without immediate 988 access receive special communications to access the existing 1-800-273-8255 crisis hotline number.”).

U.S. households within the Commission’s proposed timeline of 18 months, while also making sure this important resource is stood-up properly to allow for its reliability and sustainability.

Before discussing the specific elements of the phased-in implementation plan, USTelecom walked through the underlying policy assumptions the Commission would need to adopt from the *NPRM* that serve as the basis for USTelecom’s phased-in implementation plan. First, USTelecom assumes that the Commission will adopt its lead proposal to designate 988 as the 3-digit dialing code for the national suicide prevention and mental health assistance hotline. There is abundant record and Congressional support for 988 as the 3-digit dialing code.⁵

Second, USTelecom assumes that the Commission will adopt its proposal to route all calls made to 988 to the current toll-free access number for the Lifeline and Veterans Crisis Lines (800-273-8255). Again, this is an area with abundant record support.⁶

Third, USTelecom assumes that the Commission will adopt its proposal for carriers to recover their own costs. During the meeting, USTelecom also discussed the \$300 million preliminary implementation cost estimate in the *NPRM*. USTelecom believes that the \$300 million cost estimate for complete switch replacement in the Commission Staff Report is too low if implementation would require replacing or upgrading *all* legacy switches as the *NPRM* appears to suggest.⁷ That estimate, based on North American Numbering Council (“NANC”) discussions, applies to the small subset of legacy switches that the NANC identified as ones that could not accommodate 988, not all legacy switches. To replace all legacy switches, USTelecom believes that the cost would likely be in the billions of dollars.

The cost of switch replacement is less of a concern under USTelecom’s phased-in implementation plan since the 988 conversion can be accomplished with a less costly approach if the Commission adopts its widely-supported proposal to move to mandatory 10-digit dialing in area codes where today both 988 is already in use as an NXX code and 7-digit dialing is allowed.⁸ As USTelecom and its members have continued to evaluate timely and predictable implementation for 988, it has become clear that 988 could be implemented through switch translations and upgrades in areas with 10-digit dialing. While carriers will still incur costs associated with these switch translations and upgrades, they are significantly less than the switch replacements contemplated in the *Suicide Hotline NPRM*. Further, moving to 10-digit dialing

⁵ See, e.g., American Association of Suicidology *et al* Reply Comments at 1 (Mental Health Reply Comments); Chris Cioffi, *Suicide Prevention Hotline Bill Inches Closer to Trump’s Desk*, RollCall (May 14, 2020), <https://www.rollcall.com/2020/05/14/suicide-prevention-hotline-bill-inches-closer-to-trumps-desk/>.

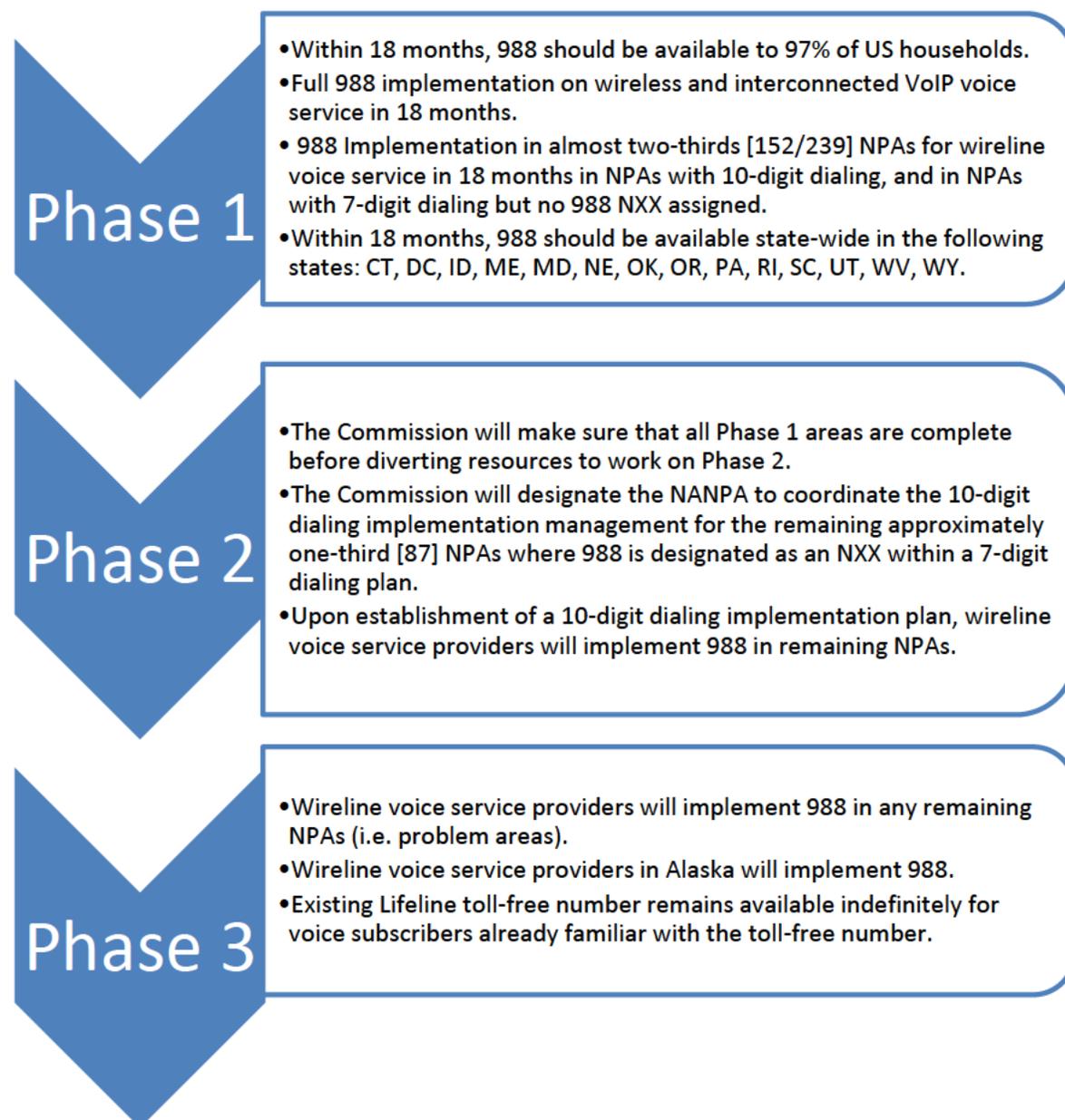
⁶ Jennifer Brattle Comments at 1 (expressing support for “leveraging-rather than duplicating existing resources” by investing in already existing call centers); Trevor Project Comments at 5 (supporting the proposal to route calls to the existing Lifeline because it “increases efficiency by eliminating the need to establish a new call center to perform the same function.”); USTelecom Reply Comments at 4.

⁷ See *Suicide Hotline NPRM* at para. 57. See also, Wireline Competition Bureau and Office of Economics and Analytics, Report on the National Suicide Hotline Improvement Act of 2018, (Aug. 14, 2019), <https://docs.fcc.gov/public/attachments/DOC-359095A1.pdf>.

⁸ See, e.g., CenturyLink Reply Comments at 4-5 (“[U]se of a dialing delay is not a technically feasible way to implement 988 as a national suicide hotline.”); USTelecom Reply Comments at 5.

will not only be the simpler, easier, and less costly approach for 988 implementation, but most importantly will also lead to a more reliable and predictable connection to help.⁹

Assuming the Commission supports these underlying policy assumptions, USTelecom proposed the following phased-in implementation plan, which would predictably roll out 988 while also making sure this important resource is stood-up properly.



⁹ See, e.g., American Foundation for Suicide Prevention Comments at 1 (“We urge the Commission to ensure national accessibility to 988 without dialing delays or gaps in coverage. Non-uniform access to 988 will confuse callers and be a detriment to accessing crisis services”); USTelecom Reply Comments at 3-4 (“If callers cannot reliably access accredited mental health professionals in a timely manner via the 3-digit dialing code, the public will lose confidence in the entire system.”).

USTelecom believes that Phase 1 could be accomplished within 18 months, meaning that 988 could be available to approximately 97% of U.S. households within the Commission's proposed implementation timeline. This would include full 988 implementation on wireless and interconnected VoIP voice service networks in 18 months,¹⁰ thereby making 988 available to at least 92% of U.S. households.¹¹ In addition to 988 being available in all homes with wireless and VoIP voice service, wireline voice service providers would implement 988 in nearly two-thirds of the numbering plan areas ("NPAs") across the country that already have mandatory 10-digit dialing requirements or do not have an 988 NXX assigned within a 7-digit dialing NPA. USTelecom estimates this would bring 988 availability to approximately 5% more U.S. households.¹² This increases the estimated percentage of U.S. households with 988 availability within 18 months to 97%, and would make 988 available state-wide in 14 states.

Once Phase 1 is complete, resources would be available to finish planning and implement the transition from 7-digit dialing to 10-digit dialing in NPAs across the remaining states where 988 is already in use as a central office code. The list of these remaining NPAs along with their associated rate centers is attached as Appendix B. Since these NPAs still employ 7-digit dialing and the 988 number is already in use in those NPAs as a central office code, or NXX code, additional work is needed to ensure calls can be routed to the Lifeline. USTelecom notes that these remaining NPAs represent a lower population density since most of the more populated areas have already adopted mandatory 10-digit dialing. Further, the overwhelming majority of U.S. households in these remaining NPAs are likely to also have wireless voice service in addition to wireline voice service, so the household will have access to 988 as well as the existing toll-free number.¹³

USTelecom believes that the Commission should designate a central project manager to coordinate the transition from 7- to 10-digit dialing in those NPAs listed in Appendix B due to the number of different providers involved and the unprecedented scope of this project. As USTelecom has previously discussed, this would be the largest number of NPAs transitioned at one time and would encompass NPAs from coast to coast.¹⁴ USTelecom suggests that the Commission designate the North American Numbering Plan Administrator ("NANPA") to oversee and facilitate the planning and implementation of these NPA transitions, due to NANPA's strong national presence and existing knowledge of the carriers operating in each NPA. Not only is the NANPA a logical choice to facilitate the planning of the 10-digit dialing

¹⁰ CTIA Comments at 2 ("[S]ome service providers, such as mobile wireless and IP-based voice services, face relatively few challenges,"); NCTA Reply Comments at 2 ("[C]able operators, [] are able to implement 988 as the unique dialing code for the suicide hotline in an expeditious manner.").

¹¹ *USTelecom Industry Metrics and Trends 2020* at 10, USTelecom (Apr. 2020), <https://www.ustelecom.org/wp-content/uploads/2020/04/USTelecom-State-of-Industry-2020-4.27.20.pdf>.

¹² USTelecom arrived at the 5% figure by looking at the 8% of ILEC Switched Landline Phones discussed in note 11 and multiplying it by the approximately two-thirds of NPAs (or 63.5%) that will be completed within 18 months; i.e. $0.08 * 0.635 = .0508$ or 5%.

¹³ SJ Blumberg, JV Luke, *Wireless substitution: Early release of estimates from the National Health Interview Survey, January–June 2019*, National Center for Health Statistics (May 2020) at p. 5 <https://www.cdc.gov/nchs/nhis.htm> (showing that only 2.5% of households are landline only and do not have a working cell phone in the home).

¹⁴ USTelecom Comments at 7, n.17 ("[T]here have rarely been more than a few NPA overlays in process at any one time.").

transitions across all industry participants, but the NANPA as a central manager would help ensure consistency in implementation, hold carriers accountable, and work with carriers to condense the time it takes to complete these transitions.¹⁵

Once the NANPA and the industry establish a 10-digit dialing transition plan as part of Phase 2, wireline voice service providers would implement 988 in the remaining NPAs as quickly as possible following specific timelines to be established by the NANPA and the industry. In addition to helping carriers plan the transition to 10-digit dialing, these timelines would provide predictability for 988 public education campaigns because the mental health community would know when specific areas and states would have 988 ubiquitously available.

Finally, Phase 3 would address any unanticipated areas where 988 could not be implemented in Phase 2, as well as Alaska. Due to the unique geography, short construction season, and network considerations in Alaska, USTelecom encourages the Commission to carefully consider the implementation timelines for Alaska separately from whatever implementation timeline it designates for the lower 48 states and Hawaii. For voice subscribers outside of Alaska, USTelecom anticipates that Phase 3 would represent a small percentage of wireline voice service subscribers.

Until the Commission mandates 10-digit dialing in the NPAs where 7-digit dialing exists and a 988 central office code is assigned, and identifies a central manager to facilitate the industry's establishing and implementing a 10-digit dialing transition plan, USTelecom cannot predict a timeline for ubiquitous 988 implementation due to these unknown variables. However, USTelecom believes the phased-in implementation plan avoids more costly resources and time-intensive network changes. Furthermore, the existing Lifeline toll-free number will remain available for voice subscribers already familiar with the toll-free number.

¹⁵ See, Letter from Randy Clarke, Vice President Federal Regulatory Affairs, CenturyLink to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-336, at 2-3 (filed April 9, 2020) (Indicating that once a plan is implemented, it can take 12 months to transition an NPA from 7 to 10-digit dialing.). Due to the length of these transition times and number of NPAs to be transitioned, USTelecom anticipates that it will take considerably longer to complete Phase 2 than it will to complete Phase 1.

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USTelecom remains committed to continuing to work with all government and mental health stakeholders to achieve a successful, ubiquitous implementation of a 3-digit, nationwide, dialing code for mental health crisis intervention.

Please contact me with any questions.

Sincerely,



Kristine Hackman
Vice President, Policy & Advocacy

cc: Pam Arluk
Melissa Kinkel
Heather Hendrickson
Michelle Selater
Jesse Goodwin
Celia Lewis
Zach Ross
Dan Kahn
Justin Faulb

Appendix A

USTelecom Representatives

Lisa Phillips, Alaska Communications

Vonda Long, AT&T

Ola Oyefusi, AT&T

Randy Clarke, CenturyLink

Phil Linse, CenturyLink

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Dyan Adams, Verizon

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Appendix B

State	Rate Center	NPA / NPA Complex	NPA Dial Plan	988 NXX Assigned
Alabama	Foley	251	7	Yes
Alaska	Juneau	907	7	Yes
Arizona	Phoenix	480	7	Yes
Arizona	Nogales	520	7	Yes
Arizona	Yuma	928	7	Yes
Arkansas	Jacksonville	501	7	Yes
California	Modesto	209	7	Yes
California	Orland	530	7	Yes
California	Long Beach	562	7	Yes
California	Alhambra	626	7	Yes
California	Mountain View	650	7	Yes
California	Whitehorn	707	7	Yes
California	Walnut Creek	925	7	Yes
California	Irvine	949	7	Yes
California	Moreno	951	7	Yes
Colorado	La Veta	719	7	Yes
Colorado	Fort Collins	970	7	Yes
Delaware	Selbyville	302	7	Yes
Florida	Clermont	352	7	Yes
Florida	Boca Raton	561	7	Yes
Florida	Jacksonville	904	7	Yes
Florida	Sarasota	941	7	Yes
Florida	Eau Gallie	321A	7	Yes
Georgia	Perry	478	7	Yes
Georgia	Pooler	912	7	Yes
Guam	Agana	671	7	Yes
Hawaii	Honolulu	808	7	Yes
Illinois	Lacon	309	7	Yes
Illinois	Herrin	618	7	Yes
Illinois	La Grange	708	7	Yes
Indiana	Lakes of the Four Seasons	219	7	Yes
Indiana	New Carlisle	574	7	Yes
Iowa	Hudson	319	7	Yes
Iowa	Des Moines	515	7	Yes
Kansas	Coffeyville	620	7	Yes
Kansas	Bendena	785	7	Yes
Kentucky	Paris	859	7	Yes
Louisiana	Lafayette	337	7	Yes
Louisiana	New Orleans	504	7	Yes

Massachusetts	N/A (test code)	413	7	Yes
Michigan	Grand Rapids	616	7	Yes
Michigan	Montrose	810	7	Yes
Michigan	Ewen	906	7	Yes
Michigan	Saginaw	989	7	Yes
Minnesota	Hallock	218	7	Yes
Minnesota	Twin Cities	952	7	Yes
Mississippi	Myrtle	662	7	Yes
Missouri	St. Louis	314	7	Yes
Missouri	Springfield	417	7	Yes
Missouri	Kirksville	660	7	Yes
Missouri	Blue Springs	816	7	Yes
Montana	Dillon	406	7	Yes
Nevada	Round Mountain	775	7	Yes
New Hampshire	Portsmouth	603	7	Yes
New Jersey	Marlton	856	7	Yes
New Jersey	Summit	908	7	Yes
New Mexico	Santa Fe	505	7	Yes
New Mexico	Carlsbad	575	7	Yes
New York	Nassau	516	7	Yes
New York	Otego	607	7	Yes
New York	South Dayton	716	7	Yes
New York	Warwick	845	7	Yes
New York	Westchester Zone 8	914	7	Yes
North Carolina	Fayetteville	910	7	Yes
North Dakota	Bismarck	701	7	Yes
Ohio	Amherst	440	7	Yes
Ohio	Trenton	513	7	Yes
South Dakota	Sioux Falls	605	7	Yes
Tennessee	Jackson	731	7	Yes
Tennessee	Lenoir City	865	7	Yes
Texas	Rosebud	254	7	Yes
Texas	Lolita	361	7	Yes
Texas	Orange	409	7	Yes
Texas	West Roger Mills	806	7	Yes
Texas	Sabinal	830	7	Yes
Texas	Desert Haven	915	7	Yes
Texas	Aspermont	940	7	Yes
Vermont	North Troy	802	7	Yes
Virginia	Tazewell	276	7	Yes
Virginia	Roanoke	540	7	Yes
Virginia	Ashland	804	7	Yes
Virginia	Newport News Zone 3	757/948	7*	Yes

Washington	Odessa	509	7	Yes
Wisconsin	Point Washington	262	7	Yes
Wisconsin	Milwaukee	414	7	Yes
Wisconsin	Mount Hope	608	7	Yes
Wisconsin	Watertown	920	7	Yes

Note: 7* indicates that an overlay has been approved and mandatory 10-digit dialing will be implemented on April 24, 2022.