



September 12, 2024

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

WRITTEN EX PARTE COMMUNICATION

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

Dear Ms. Dortch:

The Industry Council for Emergency Response Technologies (“iCER T”) submits this written ex parte communication in response to the FCC’s Second Further Notice of Proposed Rulemaking on Implementation of the National Suicide Hotline Act of 2018 (“988 NPRM”).¹

iCER T appreciates the FCC’s continued efforts to improve access to the critical, life-saving services provided by the 988 Suicide & Crisis Lifeline (“988 Lifeline”), and we agree with the Commission that traditional ways of routing wireless calls to 988 must change to ensure that callers get the timely help they need. Today, wireless calls to 988 are routed to a crisis center based on the caller’s area code and exchange, which presents significant challenges for the 988 Lifeline’s routing system when a wireless call is made from outside the area code associated with the device. iCER T agrees this process can be improved by using georouting techniques.

¹ Implementation of the National Suicide Hotline Act of 2018, WC Docket No. 18-336, Second Further Notice of Proposed Rulemaking (“988 NPRM”), (rel. April 26, 2024).

Fortunately, as T-Mobile and other commenters have noted in earlier filings, georouting solutions are expected to be implemented later this year.² CTIA, for example, states that the nationwide wireless providers, AT&T, T-Mobile, and Verizon, are working as expeditiously as possible with the 988 Lifeline Administrator to enable georouting of wireless voice calls to the 988 Lifeline in a manner that aligns with wireless providers' end-to-end IP-based network capabilities and the need to protect 988 callers' privacy.³ Competitive Carriers Association ("CCA") adds that, "while non-nationwide providers have yet to begin implementing 988 georouting solutions in their networks, the solutions developed by nationwide providers provide a blueprint for non-nationwide providers to adopt in the future."⁴ Given the expected near-term implementation of georouting solutions, we agree with T-Mobile, CTIA, and CCA that new rules requiring georouting of 988 calls may not be necessary to achieve the Commission's desired goal. We also agree with CTIA, Comtech, and others that, to the extent the Commission adopts new rules, such rules should not undermine solutions currently being implemented and should provide wireless service providers with flexibility in implementing georouting solutions.⁵

iCERT does recommend the FCC consider amending a current rule that would provide state and local 988 Authorities with greater flexibility in determining the toll-free access number to which 988 calls are routed. Currently, section 52.200(b) of the FCC's rules requires "all covered providers to transmit all calls initiated by an end user dialing 988 to the current toll-free access number for the National Suicide Prevention Lifeline, presently 1-800-273-8255 (TALK)."⁶ However, as the State of California Governor's Office of Emergency Services ("CalOES") notes, some states are implementing different approaches for managing 988 calls.⁷ In order to

² See Comments of T-Mobile USA, Inc., in response to 988 NPRM, filed Jun. 28, 2024, at 1.

³ See Reply Comments of CTIA ("CTIA Replies"), in response to 988 NPRM, filed Jul. 29, 2024, at 1-2.

⁴ See Reply Comments of Competitive Carriers Association, in response to 988 NPRM, filed Jul. 29, 2024, at 2.

⁵ See CTIA Replies at 2. See also Comments of Comtech Telecommunications Corp., in response to 988 NPRM, filed Jun. 28, 2024, at 2-3.

⁶ 47 C.F.R. § 52.200, "Designation of 988 for a National Suicide Prevention and Mental Health Crisis Hotline."

⁷ See Comments of the State of California Governor's Office of Emergency Services ("CalOES Comments"), in response to 988 NPRM, filed Jun. 28, 2024.

accommodate such approaches, iCERT recommends the FCC modify Section 52.200 (b) to read as follows:

“(b) All covered providers shall (1) transmit all calls initiated by an end user dialing 988 according to the state or local 988 Authority’s designated toll-free access number or points of interconnection; or (2) In the absence of a state or local 988 Authority’s designated toll-free access number or point of interconnection, covered providers shall transmit all calls initiated by an end user dialing 988 according to the SAMHSA-designated toll-free access number for the National Suicide Prevention Lifeline, presently 1–800–273–8255 (TALK).”

iCERT appreciates and supports the Commission’s continued efforts to improve access to the 988 Lifeline. As the Commission is considering the adoption of new rules, we urge it to consider the recommendations made by iCERT. Thank you for the opportunity to provide iCERT’s views on this important matter.

Respectfully submitted,

/s/ George Kelemen
Executive Director
Industry Council for Emergency Response Technologies, Inc.
www.theindustrycouncil.org
Gkelemen@theindustrycouncil.org

Attachment

cc: Merry Wulff