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05/30/2019

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

N11 Code / National Suicide Hotline Improvement Act of 2018
WC Docket No. 18-336; CC Docket No. 92-105

Re: North American Numbering Council Report and Recommendation on the Feasibility of Establishing a 3-Digit Dialing Code For a National Suicide Prevention and Mental Health Crisis Hotline System

Note: I am submitting these comments as a concerned citizen, an Air Force Viet Nam Era Veteran and someone with a strong background working with the North American Numbering Plan (NANP). While I am a VA Employee, the comments in this document have not been vetted by the VA or SAMHSA, they are my professional opinions based on my work experience in the Telecom Industry. I have represented a previous employer at the Alliance for Telecommunications Industry Solutions (ATIS) on the Industry Numbering Committee (INC) and representing ATIS/INC at the North American Numbering Council (NANC) after co-chairing a committee to research another Congressionally mandated report for Numbering for Relay Services for the Deaf and Hearing Impaired. I have worked at industry level on several Area Code Splits and Overlays.

Note: This report was approved by NANC for submission to FCC on May 8, 2019 however it was not submitted to and posted by the FCC as of 5/30/2019. After frequent checks on the [NANC Chair website](#), the finalized [report dated, May 10, 2019 was found on 5/26/19](#). This delay has created a delay in the public discussion, but it should not reduce the time frame for that discussion. I would like to request the 21 days normally set aside for public discussion start on the date the FCC is able to post this report on the ECSF Website.

(Underlined text highlighted in yellow throughout this document will signify a clickable link to the referenced document or site).

1. **Why Repurpose 611 to Improve Access for Suicide Prevention? The FCC:** “N11 codes (211, 311, 411, 511, 611, 711, 811, 911), N11 codes are among the **scarcest of numbering resources under the Commission’s jurisdiction.**” ([FCC-04-111A1: III.A.1. page 5](#)).

If there was an N11 available (i.e. not in use) today, and an Entity or Industry were to request FCC assignment of that N11 to allow them to use an N11 for Marketing and

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Sales as well as to create a Competitive Advantage for the repair of devices used for the services they provide, when this repair service is offered by competing non-Telecom businesses, the FCC would hopefully turn them down flat and probably admonish them for even asking. That would likely also be the case as well if the Telecom/Cable/Internet industry were to make a request for 611 assignment, which was only allowed for use by just the Telecom Industry for repair services ([FCC-04-111A1: Footnote 27, page 5](#)) when no competition existed, but not assigned. While the Telecom Industry has not made the request, the NANC report in effect is asking the FCC to allow the continued abuse of **one of the Scarcest FCC Resources...** in lieu of Assignment of 611.

Secret Shopper: Recently I decided to use it as an opportunity to “experience 611”. I dialed my Telecom Provider via 611. I described a fictional problem I was having, but that I was only looking for possible solutions. The representative suggested some steps to try and advised if that didn’t work to bring it in to their nearest service center. That took about 7 minutes.

There are multiple cell phone repair options in my community (Google: [Cell Phone Repair Near 21122](#)), none of those were mentioned as an alternative for repair service... 611 creates **a competitive advantage** for the carrier providing telecom service to your device over the “Phone Doctor,” “Best Buy Geek Squad” and other non-Telecom Provider options available.

The call continued: The representative then offered to transfer me to a specialist who could offer upgrade options rather than pursuing a repair option... I agreed. The next 60 minutes was **an aggressive sales pitch** to get me to spend an extra \$50 a month to replace both my our phones with comparable i8 phones instead of our i7s. I finally cut her off after 60 minutes saying I ready to make the decision.

Competitive Advantage and using 611 for Sales was never intended for N11s... a Scarce FCC Resource. This may explain why the Telecom Industry is willing to build a direct marketing campaign, to their customer base, around 611 even after the FCC explicitly said in 2004 that “N11 codes that have not been assigned nationally can continue to be assigned for local uses, provided that such use can be discontinued on short notice” ([FCC-04-111A1: III.A.8. page 5](#)).

300,000,000 calls annually: (74,163,403 as reported in the [NANC/NAOWG 5/10/19 report 4.10 page 20](#)) to 611, an unlisted “Public Service Phone Number”: All of the “assigned” N11s are seen or heard in PSAs, publicly displayed signage, on the web, and in ways that the N11s target audience will learn to associate the N11 with its intended purpose... a couple examples include 911 on police, fire and medical response vehicles; 811 on utility vehicle and transformers (probably one in your yard).

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611 is not marketed or advertised in public settings, nor as a Public Service Announcement. You'll never see 611 on a Verizon, Sprint, AT&T, Comcast or other Telecom Providers vehicles, although they do display their individual 800#s. That's because **611 is not used in the Public Switched Telephone Network (PSTN) but instead on closed networks belonging to each carrier.** Because 611 is only in private networks, 611 on a Verizon service vehicle for example (advertising 611 in a public setting) will generate calls to their competitors which would be counterproductive for Verizon. **N11s, a Scarce FCC Resource were intended for use in the PSTN... not in Private Networks.**

So how can there be 300,000,000 annual calls using 611... the answer: private marketing from each Telecom, Cable and Internet Provider directly to their customers.

Why would these Providers devote the resources for “one on one” marketing? Because they've found it to be a very effective form of marketing: i.e. **Profitable.**

Expanded Use of 611 without FCC Order. Originally intended for Telecom Service, it is now typical for service calls to end with a sales pitch from the Telecom Provider offering upgrades. Also, Telcom Carriers now include Cable TV, Internet and even Company Branded Credit Cards. As a result, 611 is no longer exclusive to Telecom, it has been expanded into other industries. It is now a 3-digit phone number for existing customers with companies offering more than just Telecom and thus 611 becomes a competitive advantage over Cable TV providers not offering Telecom and now a Telecom Provider advantage within the Credit Card industry.

Therefore, a call volume analysis should have excluded or at least broken out sales activity as well as non-Telecom transactions. Telecom Providers should also provide data comparing 611 calls to calls via their 800#, as well as internet chat (automated and live) and other real-time communications avenues to get the full picture.

That said: Is utilization / volume comparing Public Service N11s against a Customer facing N11 used for Service, Sales, and even Credit Card updates... relevant?

The FCC should regain control of this Scarce FCC Resource as Public Service instrument. Aside from the tremendous opportunity to impact suicide deaths in the United States, 611 in its current use, can and should be addressed as a stand-alone issue ahead of the Congressional task to find a 3-digit solution to improve access for Suicide Prevention.

2. **NANC Report outlines obstacles to Repurposing the Use of 611 ([NANC Report 4.6.3 page 13](#)):** The report lists several reasons as “practical implications” for the industry if 611 is repurposed for Suicide Prevention that implies they have not prepared to discontinue use of 611 per the FCC Order “that “N11 codes that have

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not been assigned nationally can continue to be assigned for local uses, provided that such use can be discontinued on short notice” ([FCC-04-111A1: III,A.8. page 5](#)). In fact, as shown above, they have continued to increase spending and / or marketing 611 in their private networks, building marketing strategies and competitive advantage around 611.

The report also makes statements (also in 4.6.3 page 13) about increasing marketing of existing Suicide Prevention 800#s and compares costs that would be needed to expand marketing by Suicide Prevention to cost incurred the industry will incur to discontinue use of 611 including changing their direct marketing focus from 611 to their existing 800#s. While I’m sure the authors of the report have access to Telecom marketing experts as evidenced by 300 Million annual calls to an otherwise unlisted number, they do not cite any marketing and/or mental health experts they consulted on the statements on increasing marketing to the existing Suicide Prevention numbers... enough said.

Under Disadvantages of Repurposing 611 ([NANC Report 4.6.4 page 14](#)) various costs that would be incurred by the industry to correct their marketing focus to use direct marketing of 611 which for the most part occurred after the FCC statements that **“N11 codes that have not been assigned nationally can continue to be assigned for local uses, provided that such use can be discontinued on short notice”** ([FCC-04-111A1: III,A.8. page 5](#)) as well as costs related to translations to an intercept message giving updated Telecom Provider 800# information (Industry Costs) and then again at implementation translations direction 611 calls to the existing National Suicide Prevention Lifeline (NSPL) (3-digit access for Suicide Prevention cost). The report implies all costs fall to 3-digit access for Suicide Prevention.

The report also makes assumptions dealing with customer and public education as well as a perceived need for an extended aging period for 611 as it is being discontinued from its current use and prepared for use as the Nation Suicide Hotline or the National Suicide Prevention Lifeline. My suggestion / comments follow...

Education vs. Aging: Much like processes for Area Code Splits, there are 3 elements to be considered when educating customers currently using 611 (the existing and if so ordered by the FCC, discontinued use).

The education efforts for Suicide Prevention 611 (my opinion) would likely not occur for 30 days after Telecom Industry implementation. Since all of the existing Suicide Prevention Numbers will remain active after implementation there is no “Cut-Over” and this would allow testing to ensure proper routing is occurring. Education could then be a gradual buildup both geographically and through various channels.

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During implementation Telecom Sales and Service 611 would initially be cut to give intercept recordings. Each Telecom Provider could opt to start out giving the existing 800# for that provider however this may not drive education as the caller could keep dialing 611 to get the new number. I recommend that not later than 60 days after the switch to intercept recording the Telecom Provider can either give a simple disconnect message for 611 or direct the caller to web or mailings having information on the 800# for that Telecom Provider (this will drive education).

The second element will be converting the existing Telecom Provider 611 sales & marketing to direct customers to use each Providers 800# instead. This part of customer education should be started at the Providers discretion but well before the date ordered for the 611 disconnect to an intercept message. Since all of the people using 611 are customers, the Telecom Providers have a direct path to continue the marketing process but with their 800# instead of 611 advising them that 611 service is being discontinued. I recommend that this phase of the education does not include information the repurpose to Suicide Prevention as this may generate calls prematurely.

The suggestion in the report that some Telecom Providers do not have a phone number besides 611 for sales or service not plausible.

The third element in a number change such as this is aging in effect the “forget about it” approach. This is typically needed when it is difficult to identify the target audience. With PSA advertising or even conventional media or signage marketing of a phone number, it's hard to ensure that the same audience got the message that the number has changed. Plus, with signage and fliers the old message may still be out there. With any other of the N11s, ensuring current users got the message and that all signage and materials have been removed (this would be the case with 511 if the NANC N11 solution is used). Fortunately, 611 is very different in that there has been no public marketing, signage or fliers for years, probably decades. The same approach that drives 300,000,000 annual calls can be employed to inform users of the existing 611 of the 800# and disconnect of 611 as it's being used now.

Some aging will naturally occur during the process to prepare for implementation. In addition, at 3 to 6 month intervals the Telecom Industry should conduct call volume studies as was done for the N11 study, to monitor and validate the drop in usage of 611. Information from these studies can be used to adjust how long the intercept messaging should continue and the date for implementation to Suicide Prevention.

Telecom Industry Data: 74,163,403 calls to 611 in a 90-day span (**NANC Report 4.10, page 20**). An impressive number, however, with further **analysis:**

- 300 Million call per year (74,163,403 x 4)
- US Population over 14 years old – 266 Million (327 Million total population)
- Not all 266 Million people would have phones.

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Safe to say that a number of people (number unknown with the data given) make repeated calls to 611 every year. This improves the likelihood that an intercept recording after 611 is taken out of service will be effective as part of the education effort.

Call Volume Studies: The industry provided data to analyze Utilization/Call Volume for existing N11s. I would like to point out that 611 as currently used, has many calls that are out of scope for its intended purpose. Originally intended for Telecom Service, it is now typical for service calls to end with a sales pitch from the Telecom Provider offering upgrades.

Therefore, a call volume analysis should have excluded or at least broke out sales activity as well as non-Telecom transactions (Cable or IP). Telecom Providers should also have provided data comparing 611 calls to calls via their 800#, as well as internet chat (automated and live) and other real-time communications avenues to get the full picture.

That said: Is utilization / volume comparing Public Service N11s against a Customer facing N11 used for Service, Sales, and even Credit Card updates... relevant?

3. **The NANC report suggests the 511 (Transportation and Traffic Information) be repurposed if an N11 solution is the recommendation.** Education will be difficult in that 511 signage (PSA's) are scattered at various points highways across most states and it is likely the locations are not documented. This will also be true in rest areas and service areas along highways.

The report fails mention the Public Service Roles 511 plays including a growing number of states providing information on Amber (and other) Alerts. Use of 511 is still expanding as traffic conditions grow across the Country. It may be too soon to evaluate the effectiveness of 511 for Amber Alerts. My impression was that 511 was picked by the NANC primarily based on call volume which by design given it's targeted role on Highways, would have limited call volume.

4. **Expanding the Use of 211 (NANC Report 4.2, pages 7-9):** SAMHSA and VCL report that a significant factor in the successfulness of the National Suicide Prevention Lifeline is tied to call answer times. They have developed a network of call centers and supporting technology that routes and overflows incoming calls between call centers based on call origination location, call volume, call center capacity and call answer times. Dr. McKeon of SAMHSA at the May 8th NANC Meeting **stressed the importance of maintaining the already in place and proven system.**

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Typically, 211 Call Centers are answered by an IVR to distribute and prioritize calls based on need to staff having specialized training appropriate to the needs. The NANC Report suggests the IVR system be enhanced and modified to support Suicide Prevention. The issue I see with an IVR answer point is that it not only puts the client in the frustrating position that we all have experience with a “phone tree” and picking from the options at a point where the client is already likely in a confused state. More importantly since the call can not be “triaged” until after it is answered by the IVR, it takes out or at least impairs the existing and proven call overflow and priority system.

Dr. McKeon also mentioned that 40, 211 Call Centers currently participate in the NSPL Network. These 211 Call Centers likely use technology similar to answering service technology, where incoming calls are identified, prioritized and answered using the business name based on the number called. This same concept for Suicide Prevention Hotline would allow the system to “Triage” calls based on number dialed with NSPL (800-273-TALK or 611) going directly to staff trained in Suicide Prevention with existing protocols and 211 calls as they do now, through the existing IVR systems following their existing 211 Call Center processes and priorities.

Since 211 Call Centers typically locally or regionally managed, with various funding streams and a local or regional Board of Directors making mission and priority decisions, mandating that 211 call centers take on the added staffing and technology requirements for Suicide Prevention and or the NSPL Network will require complex negotiation and funding at various levels. By having a dedicated National Suicide Prevention 3-digit access number, 211 Call Centers can opt to participate with the NSPL Network of Call Centers if they agree to the NSPL established standards.

This approach will not prevent additional 211 Call Centers from participating in the NSPL Network but will allow incoming calls to be “Triage” based on number dialed without added intervention by an additional IVR.

5. **New Non-N11 3-Digit Code:** The Code recommended by the NANC is 988. As explained in the report, there are significant concerns by creating a new 3-digit code. There will be some legacy switches in the PSTN that will not be compatible with establishing a new 3-digit code. This will leave gaps as explained in [FCC-04-111A1: III.B. page 8](#) in 2004 and updated by [Tom McGarry \(TGM Consultants, LLC\) FCC comments](#). There are concerns that many of these legacy switching facilities are no longer supported by the manufacturers for the changes that would be required and this would leave areas supported by these facilities without 3-digit access while the people in these areas will be receiving National and Social Media information on 3-digit access giving the expectation that “988” would work. This will create confusion for someone wanting to find the number to call Suicide Prevention.

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The NANC Report recommends appropriately, that if 988 is to be considered that more study on the impacts implementing this solution will be required.

The National Suicide Hotline Improvement Act – One Final Improvement Request.

At the March 28th NANC Meeting, Dr. McKeon, SAMHSA described the call flow for the NSPL Call Routing / Overflow & Priority system that is so effective in reducing call answer times. He stated the calls are routed first to the nearest NSPL Call Center based on the NPA (Area Code) of the caller then potentially overflow if needed to other parts of the country. However, if Cellular caller is out of town or has moved without changing the phone number, the call is still routed based on the NPA. (Ex: I moved from Michigan to Maryland but kept my Metro Detroit phone number... my call would still route to an NSPL Call Center in Michigan.)

All cell towers are assigned a “pANI” phone number as an address in the Telecom systems. Calls to 911 are routed to the appropriate 911 Call Center based on the pANI of the tower the caller’s phone is connected to at the moment the call is made.

As we move towards implementation the Telecom Industry, if possible, should make changes to route cellular 611 calls to the NSPL network based on the pANI NPA. Even if not possible throughout the PSTN, this will be a plus where it can be added and no harm where it can’t because the calls will still route at least as they do currently, to another NSPL call center.

A personal note: I have been giving “elevator speeches” to anybody who would listen on the concept of repurposing 611 for Suicide Prevention since I developed the concept 4 ½ years ago. Most people I have encountered were not aware of 611 for telecom repair services, but without exception all were aware of the problem of Suicides in the U.S. and the need for improved Suicide Prevention. I believe that technically 611 is the best and an achievable solution to be able to provide 3-digit access for Suicide Prevention Nationwide.

My thanks to all at the NANC and FCC working to Improve Access for Suicide Prevention. Since December of 2014, when I first started on this effort, there have been 200,000 people lost to suicide in the United States. We must continue our efforts so that the **National Suicide Hotline Improvement Act of 2018 can achieve its purpose... improving access to the National Suicide Prevention Lifeline and the Veterans Crisis Line to reduce suicides in the United States.**

Respectfully,

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