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06/07/2019

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

Re: Ex Parte Presentation on the “Implementation of the National Suicide Hotline Act of 2018” – WC Docket No. 18-336; CC Docket No. 92-105

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.

I would have preferred this as a discussion, an Oral Ex Parte. However given the abbreviated time frame for comments on the NANC Report, I am submitting this as a written Ex Parte. The following are expanding on [my previous comments](#) for what I feel are shortfalls in the NANC Report ([NANC Report May 10 2019](#)):

511 as a solution: It's original purpose of highway information is still a valid public service device for highway information and if Federal money starts flowing for infrastructure improvements, it will have even more of a need within its original design:

- The NANC report also does not address that both education and disconnect for 511 would need to be managed at a State level and there is likely to be opposition from several States.
- With more states starting to use 511 for Amber Alerts in coordination with highway information signage, 511 is clearly a valid Public Service device, a key point in any decision to repurpose 511, above and beyond call volumes.
- There also may be opposition from DOT (Highway Safety Information), DOJ (Amber Alerts), police agencies, or other agencies associated with Amber, Silver or other Alerts.

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Shared use with 211: I made some assumptions with my recent comments ([NANC Report 052819 Response – Joe Hurlbert](#) #4 Page 6-7) on the impacts to the Existing NSPL Overflow/Priority System, but it's clear that it is an existing, proven system. The IVR that the NANC report suggests would require a significant rework of the existing system and likely with a negative impact for call answer times besides the Clinical Impact being addressed by Mental Health Professionals.

- The FCC should request Vibrant Emotional Health – provider for the National Suicide Prevention Lifeline (NSPL) – for a technology assessment of the impacts to the existing NSPL Network with the 211 solution as proposed.
- SAMHSA should analyze the impacts 211 and the insertion of 211 IVR, would have on the Clinical effectiveness of the NSPL network.
- The NANC Report assumes that all existing 211 (independent) Call Centers would choose to participate with or without significant additional funding for technology and staffing. The FCC should work with United Way Worldwide to validate. There may be some local Boards of Directors who would consider Suicide Prevention outside of their mission scope and expertise to manage.

A non-N11 solution (988): the NANC report made little mention of the gaps that would be created. In 2004 the FCC discounted a non-N11 solution, for what is now 811, where the impact of leaving gaps would have been less given how 811 is marketed. For Suicide Prevention with National marketing, the gaps will result in confusion and have Clinical impacts that need a Clinical lens to assess the significance.

611: Unassigned and the only N11 not used as a public service device but instead as a Marketing Tool that creates a competitive advantage over a multitude of non-Telecom companies that offer phone repair.

- The NANC Report exaggerates issues and discounts solutions to those issues. Note that the voting majority of the NANC are telecom providers, a clear conflict of interest given the current use of 611. My previous comments have addressed several these exaggerated concerns. ([NANC Report 052819 Response](#) #2 Page 3-6)
- This is also exemplified in the way the NANC Report discounts or ignores issues and exaggerates the benefits of other solutions, examples include: 511 and its growing use for Amber Alerts (a valid highway information usage and public service) and shared use of 211 which will have negative impacts to call answer times (cited by VCL and SAMHSA as key to their Clinical Effectiveness) neither mentioned in the NANC Report.
- Also not addressed in the NANC Report is that 611 is the only N11 not used in the Public Switched Telephone Network (PSTN), but instead within each Telecom Carrier's Private Network for the exclusive use of that Telecom Carrier's Customers. Clearly not the intent for N11s a scarce resource intended for Public Service.

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Suggest the FCC should consider soliciting input from the following Stakeholders:

- **DVA/VCL and DHHS/SAMHSA:** While VCL and SAMHSA have submitted individual reports on Clinical Need and Impact for 3-digit Access for Suicide Prevention, they have not commented to the proposed NANC Technical Solutions. The FCC would benefit from Clinical Experts connecting Clinical Impacts to the Technology Solutions being proposed... which the NANC Report ignores.
- **FTC** – is the Telecom Industry is engaging in unfair business practices in the current use of 611 (i.e. Marketing and Competitive Advantage)?
- **DOT** – has the DOT been engaged on it's current and planned use for 511?
- **DOJ** – is DOJ aware of the use of 511 as part of the Amber Alert system and do they feel it adds value currently or planned in the future?
- **State Utility Commissions** – request the following information (individually or through NARUC).
 - Do they utilize 511 in their state. They have an active role in its management, and do they feel it's a value add for the people in their state?
 - Do they oversee 211 Call Center Operators in their state? Have they had feedback on quality of 211 call centers within their state?
 - In light of recent discussion, do State Utility Commissions have issue with the current usage of 611 for Marketing and or competitive advantage by Telecom and Cable Providers in their state?
- **NSPL** – the current network provider can provide information on the current NSPL Network to better assess impacts that the redesign of the Network as proposed by the NANC Report, would have on call answer times. (Client to Clinician not Client to IVR).
- **Telecom Service Providers** – Validate how many utilize 611 for their customers and if so:
 - Do they use 611 to Market Upgrades and or new Devices?
 - Do they inform callers asking for phone repairs that there are other repair options in the marketplace?
 - Do they currently have a conventional 800# for customers to reach repair services?
 - Does their website list that 800#?
 - How do their customers know about the option to dial 611 for repair or other services?

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611 Will Save Lives!



For Your Consideration,

Joe Hurlbert