



Federal Communications Commission
Washington, D.C. 20554

February 22, 2019

Travis Kavulla
Director, Energy Policy, R Street Institute
Chair, North American Numbering Council (NANC)
1050 17th Street, N.W.
Washington, DC 20036

**Re: National Suicide Hotline Improvement Act of 2018
WC Docket No. 18-336; CC Docket No. 92-105**

Dear Chairman Kavulla:

The Wireline Competition Bureau (Bureau) would like to thank you, the NANC, and the Numbering Administration Oversight Working Group (NAOWG) for your ongoing work on a draft "Report and Recommendation on the Feasibility of Establishing a 3-Digit Dialing Code for a National Suicide Prevention and Mental Health Crisis Hotline System," submitted to the Commission on February 1, 2019 ("draft Report"). The efforts of the NANC and the NAOWG, especially your fulsome discussion of the draft Report at the February 14 NANC meeting, have provided a good start toward the Commission's implementation of the National Suicide Hotline Improvement Act of 2018.

In the February draft Report, the NAOWG focuses on the technical and operational implications of establishing a 3-digit dialing code for a national suicide prevention and mental health crisis hotline system. The draft Report describes the use of the eight N11 codes currently in service (i.e., 211, 311, 411, 511, 611, 711, 811, and 911), the advantages and disadvantages of repurposing or expanding use of each, additional considerations, and data on N11 code usage. The draft Report also explores the use of a new non-N11 3-digit dialing code, as well as the implementation logistics and costs of the various alternatives. The draft Report notes that "[f]easibility considerations with associated cost-benefit analyses are central to the formulation of [N11 code] recommendations," and that "forward-looking data and projections of volumes and characteristics of various types of relevant calls" are not widely available. Thus, the draft Report does not recommend use of a 3-digit dialing code at this time, due to, *inter alia*, "the significant network and other operational changes that would be needed to establish such a code, and the absence of information indicating that such an approach will be more effective than, for example, improving awareness and usability of existing suicide prevention and mental health crisis hotlines."

The National Suicide Hotline Improvement Act of 2018 ("Act") requires the Commission to issue a report recommending whether a particular N11 dialing code or other covered dialing code should be used for a national suicide prevention and mental health crisis hotline system.¹ The Act further provides that "[i]f the report submitted by the Commission recommends that a dialing code should be used, the report shall also . . . provide recommendations for designating such a dialing code . . ." To ensure that the Commission is able to fulfill all of its responsibilities under the Act, the Bureau directs that the NANC, through the NAOWG, revise the draft Report to address the following additional questions:

¹ National Suicide Hotline Improvement Act of 2018, Pub. L. No. 115-233, H.R. 2345, 115th Congress (2018), <https://www.govtrack.us/congress/bills/115/hr2345/text>.

- If the Commission were to determine that adopting a 3-digit dialing code for a suicide prevention and mental health crisis hotline system is warranted, what N11 code or non-N11 3-digit code would the NANC recommend, and why?
- If the NANC recommends designating a new code that does not use a number sign or star (e.g., 999), we direct the NANC to consult with the North American Numbering Plan Administrator to determine (1) if there is a specific code or codes best suited for this purpose, and (2) the impact of using that code or codes on North American Numbering Plan exhaust.
- If the NANC were to recommend repurposing an existing N11 dialing code, which of the existing codes would it recommend be repurposed, and why? Please obtain and analyze call volume/utilization data for the recommended code, compared to other codes, from as large a service provider sample as possible.
- If the NANC were to recommend expanding an existing N11 code, which of the existing codes would it recommend for expansion, and why?
- Among the above three options, which would the NANC recommend?

Finally, for the 3-digit code you recommend for a national suicide prevention and mental health crisis hotline system, please explain in detail the steps required to implement use of that code and an estimated timeline for implementation. Include in this explanation an analysis of the costs to implement the code for service providers, states and localities, and the Federal government. Please also use the attached reports from the Department of Health and Human Services' Substance Abuse and Mental Health Services Administration and the Department of Veterans Affairs' Veterans Health Administration for any information relevant to your cost analysis.

We direct the NANC to approve a written report on its findings on these issues, and to transmit that report to the Wireline Competition Bureau, by May 13, 2019. The NAOWG must submit its recommended report to the full NANC no later than April 11, 2019, to allow for its consideration by all NANC members. If you have questions about this referral, please contact Marilyn Jones, the NANC's Designated Federal Officer, by telephone at (202) 418-2357, or by email at marilyn.jones@fcc.gov.

Thank you again for the assistance of the NANC, and its NAOWG, in helping the Commission fulfill its responsibilities under the National Suicide Hotline Improvement Act. Your work on this important Act will be a major contribution to suicide prevention and mental health crisis management in the United States.

Sincerely,



Kris Anne Monteith
Chief

Wireline Competition Bureau, FCC