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

To: **Commission's Secretary**
Office of the Secretary
Federal Communications Commission

12/03/2018

These comments will address the 1st FCC task related to the National Suicide Hotline Improvement Act of 2018: Conduct a study that examines the feasibility of designating a simple, easy-to-remember, 3-digit dialing code to be used for a national suicide prevention and mental health crisis hotline system.
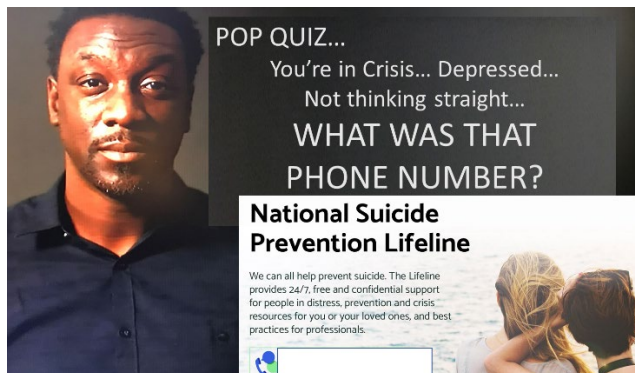
This document will present views, suggestions, concerns and recommendations on various solutions being considered. For those who don't know me, I have had experience with the NANP, FCC, NANC and ATIS/INC in the telecom industry prior to coming to work for the VA. I have attached some bullet points at the end of this document to give some validation of the comments that follow.

Potential solutions discussed will include: N11s and ERCs.

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The N11s (Pubic) Service Access Codes:

N11s were set aside the US Numbering Plan designed in 1947. "N11 Service Access Codes have been declared national resources in the US and are assigned by the FCC". The chart below shows current N11 assignments:
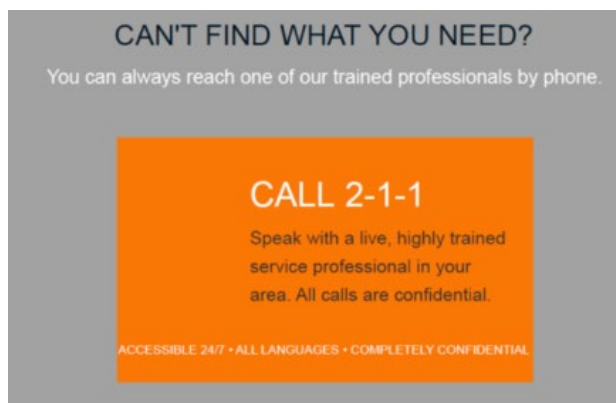
TABLE 3: UNITED STATES N11 SERVICE ACCESS CODES

N11 Code	Assigned Use
211	Community Information
311	Non-emergency access to government
411*	Directory Assistance
511	Traffic or Travel Information
611*	Telco Repair Service
711	Telecommunications Relay Service
811	Pipeline and Utility Safety
911	Emergency
* Commonly accepted use but not yet officially assigned by the FCC	

From US Numbering Dialing Plan from the Alliance of Telecommunication Industry Standards (ATIS), Industry Numbering Committee (INC)
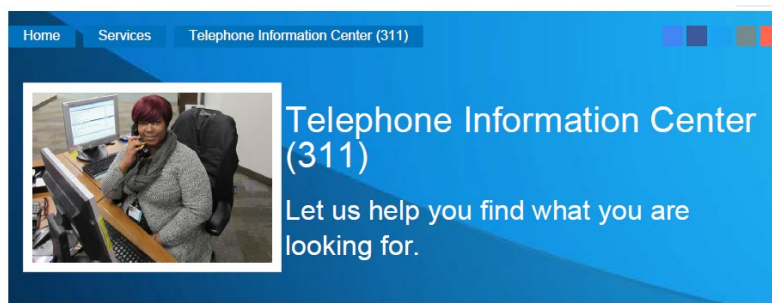
<u>211</u> – Community Service

- Is implemented widely, but not universally, serving a local, county or region in a state.
- Hit and miss, the implementation is typically funded by grants or local governments. No Money, No Mission.
- There have been suggestions of having 211 become a pass through or front ended with an IVR for Suicide Prevention. Concerns here are that 211 call centers are locally funded leaving gaps without a 211-call center and that some are not operational 24 x 7 x 365.

CAN'T FIND WHAT YOU NEED?

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CALL 2-1-1

Speak with a live, highly trained service professional in your area. All calls are confidential.

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- Gaps in coverage include large cities as well as large rural areas.
  - Recently county in Indiana lost funding and is closing it's 211 call center.
- There are no mandated service levels,
  - The qualifications of 211 staff varies, many not qualified to assist someone facing suicidal thoughts.
  - Most 211 call centers would not be able to accommodate increased call volumes.

311 – Non-Emergent Access to Municipal Services

- These services can include complaints about pot holes or garbage collection up to non-emergent police response.
- Typically implemented and funded by local government to off-load 911 call centers.
- Normally only in Metropolitan areas and is often only in operation during business hours and/or 5-days a week.

Although both 211 & 311 have been looked at as potential for sharing a number with Suicide Prevention, the inconsistent geographic availability for these numbers makes it impractical as well as the misalignment of mission and purpose.

Internet Searches Found No Public Service Advertising For 411 & 611 – Essentially Unlisted Public Service Numbers

411 – Directory Assistance (Information) – **Not Officially Assigned by the FCC.**

- Before 411 was conceived, phone number information consisted of the "Phone Book" for your community, then eventually you could dial 555-1212 for numbers within your area code.
- 411 provided a more efficient way to get the phone number you needed, regardless of location… and it was a free Public Service
- 411 still exists but "411" is now a multi-Billon dollar industry unto itself.
- Dialing 411 creates a competitive advantage for the incumbent carrier competing with the "411" industry.
- 411 can still be dialed with most, but not all, Telco Providers… although it is typically a pay for service.
- Phone number information is readily available via the internet as well as 800# providers in a competitive marketplace.
- 411 is now pay for service, as much as $5 for a 15 second call. While a convenience fee for those who can afford it, for those living in poverty, often without internet in their home or on their cellphone, it is essential, but unaffordable.
- 411 is typically blocked in Enterprise systems and as well as corporate and parent provided cellphones.
- Charges for 411 are typically regulated at the state level with a variety of requirements and restrictions.
- 411 is now listed in "urban dictionaries" as a synonym for "Information" (making re-purposing 411 difficult).
- While the original intention for 411 is arguably obsolete, its current use creates a conflict with Competitive Advantage and Profit principles for N11s.
- 411 poses complex societal, financial, and state regulatory obstacles, making vacating and repurposing timeframes an extended process.

Recommend that the FCC consider either removing 411 from service for an extended time, eventually re-purposing it, Or return it to Public Service, find paths to provide funding of 411 for those needing the service but not able to afford it. (Possible qualifiers for free access to 411, Medicaid or other subsidies for the poor.)

611 – Telco Repair Service – Not Officially Assigned by the FCC.

- When established, Cellular service did not exist and there was typically only one "Land Line" provider in a given geographic footprint area.
  - When you dialed 611, you got "Ma Bell" whether it was from Home, a Neighbor's, the office, a corner merchant or a pay phone.
  - Today you likely have different providers on your cell phone, home, office. (In other words, if your phone isn't working, you'll need to find the 800# for your provider to call from another phone for service.)
- If your phone is working and you need assistance with it, dial 611 and your provider tells you to call back on the 800# from a different phone.
  - Carriers don't advertise 611 because the calls may go to their competition.
  - A look at "Contact Us" on some carrier's websites shows 611 but always along with an "800 #"
- Enterprise systems (at the office) disable 611 because service is handled internally.
- Many Telecommunications providers no longer utilize 611.
- When you dial 611 you are only connected to the provider that the device is connected to, even though there is an abundance of competitive offerings for both Service Providers and Telephone Devices *(a competitive advantage)*.
- When you dial 611 to talk to your provider about billing or phone questions, the call typically turns into a sales pitch for upgraded service or devices *(a competitive advantage)*.
- In today's market with so many providers, type of services and a variety of devices, dialing 611 becomes a marketing connection back to your own provider which excludes the competition, abundantly available in the open market place.

The FCC has stated that "N11 Codes that have not been assigned by the Commission can continue…, **PROVIDED THAT SUCH USE CAN BE DISCONTINUED ON SHORT NOTICE."** (Specifically referring to 411 & 611)

FCC 04-111: Docket 92-105:
Section III. A. 8…

> 8. To date, the Commission has assigned the 211 for information and referral services, 311 for non-emergency police and other governmental services, 511 for travel and information services, 711 for telephone relay services for the hearing impaired, and 911 as the national emergency number.[26] In addition, 411, 611 and 811 are widely used by carriers, but have not been assigned by the Commission for nationwide use.[27] 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.

Recommend that 611 be removed from current use and Repurposed / Assigned for access to Suicide Prevention.

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511 – Traffic or Travel Info & 811 – Pipeline and Utility Safety

- Widely implemented typically at a State Level.
- Purpose and Mission do not have synergies with Suicide Prevention.

Recommend that the FCC have periodic studies of 511 & 811 (as well as other N11s) to validate continued need and use. Example: 511 - Current Technology (i.e. Cell Phone Apps) provide routing and up to the minute traffic conditions including re-routes for accidents, construction or other hazards. 511 may become obsolete.)

711 – Telecommunication Relay Services for the Deaf and Hearing Impaired.


- Nationwide implementation (Including U.S. Territories)
- An essential public service vehicle.
- Callers are routed to contracted Relay Service Provider Companies.
- Nationwide Implementation with regional Call Centers
- Mandated accessibility in all networks
- Prior to Implementation the service existed with 800# Access.
- *The implementation for Suicide Prevention would likely have a similar configuration.*

911 – Emergency (Public Safety – Police, Fire & EMS)

- The mother of all N11s.
- An awesome example of technology for the public good.
- Implemented at a City, Municipal or County level with address and GPS routing detail to ensure call delivery to the appropriate Public Safety Call Center.
- The Implementation in the early 1970's, combined Public Safety – Police, Fire & EMS into consolidated call centers.

711 & 911 are the only N11s with mandated accessibility in all networks (i.e. PSTN and Enterprise Systems.) The VA will be suggesting the 3-digit solution for Suicide Prevention is also available from all phones.
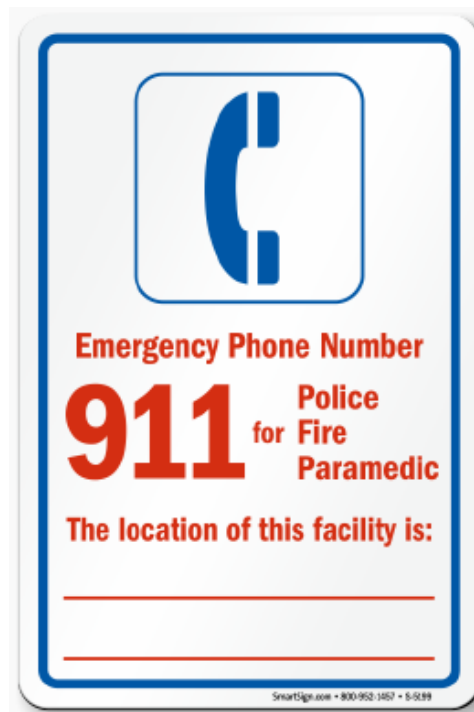
ERCs – Easily Recognized Codes:

Several ERCs have been reserved in the NANP's pool of 3-digit area codes or NPAs. The FCC has opted to protect these codes from use since the pool of NPAs is a limited resource and while changes to the NANP (pooling & porting) has greatly diminished the consumption of NPAs, the potential of exhaust still exists and would cause an extensive rework of the NANP design which has held up for over 70 years.

Still, dipping into the bank of ERCs has been mentioned as a potential solution for a 3-digit access for Suicide Prevention, however, there still is the concern for the NANP. I have not been part of discussions about the NANP approaching exhaust for several years so my suggestions that follow may have already been considered, but I'd be remis to not have them vetted for this discussion.

It seems the way to slow down consumption of NPAs would be to increase the number of Telephone Numbers (TN) in the current plan. By moving to 10-digit dialing across the NANP we can add approximately 2,100,000 TNs to all existing and future NPAs. That would be over 1.6 Billon additional TN across the NANP.

The premise is that with 10-digit dialing (NPA-NXX-XXXX) the N in NXX could then make use of 0 and 1 which adds 200 NXXs per NPA, plus most if not all of the set aside NXXs (up to about 12). For all NPAs currently with 10-digit dialing the added NXXs could be put in place as soon as any switch updates were accomplished. Any NPAs still having 7-digit dialing could be grandfathered until they approach exhaust and the first phase of relief planning would include switching to mandatory 10-digit dialing adding 2.1 Million TNs.

Another step that would add efficiency would be to have NPAs with little usage expand to overlay nearby NPAs approaching exhaust. One final suggestion would be to have non-dialable devices such as "WiFi" hotspots use rate centers or NPAs with large inventories of TNs.

Studies would need to be done to refine these suggestions and estimate the impacts, but it should slow the consumption of NPAs which may raise comfort level to allow release of some of the ERC set asides.

The concern about this suggestion as it relates to Suicide Prevention is "How Soon?"… it should not delay the assignment of an N11 or ERC for Suicide Prevention.

A brief comment about 1-800-SUICIDE. *(As a data-analyst not a Clinician.)* Most of us see this TN and think… a "solution" to connect someone to help and prevent Suicide. 123 people in the U.S. each day, see "Suicide" as the solution to all of their problems. Words can mean different thing to different people.

Recommendations:

With 123 Suicides in the United States every day any steps we can take to improve access to Mental Health experts to make the connect will reduce suicide deaths. The dates in the task from Congress are "Not Later Than" dates. We must do all we can to better those dates, followed by planning and implemention of our solution. The VA hopes that the Telecommunications Industry will partner with the FCC, VA and HHS as well as State Utility Regulators to provide 3-digit access for Suicide Prevention.

- If the ERC suggestions here have already been discussed and dismissed, we believe the 611 solution is the most viable to protect the NANP.
- If the ERC solution will need extensive study and / or implementation time, we believe the 611 solution should be presented to Congress, hopefully with the support of all parties in this discussion.
- If an ERC solution can be supported by the FCC, now … where we are today, we should move forward as soon as possible.
- **Best: if the FCC agrees that 611 is obsolete and should be returned to Public Service, we should all partner to make this happen as soon as possible.**

I believe that N11s, specifically 611, will be more recognizable than an ERC which may even be questioned as: is that really a phone number?

I am looking forward to participating in this process to improve access for Suicide Prevention and being a part of saving lives. What a privilege to have an impact like this. 3-digit access will save lives!

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Joe Hurlbert – Relevant Numbering Experience

- 8 years of experience representing Nextel and Sprint/Nextel at the Alliance for Telecommunications Industry Standards (ATIS) with leadership roles in the Industry Numbering Committee (INC). INC is one of two ATIS committees required to provide reporting to the FCC for the Telecommunications Industry.
- Chaired the INC Committee responding to an Congressional/FCC directive for the Telecom Industry to define and recommend a technical solution for the process to provide individual phone numbers for people using Relay Services for the Deaf and Hearing Impaired.
- Considered an Industry SME on Numbering, I represented the Telecommunications Industry at an FCC public forum on Numbering for Relay Services for a Q&A Panel discussion.
- Attended Sprint Ex Parte's with the FCC on Numbering issues as an SME for Sprint Regulatory Attorney's.
- Participated in Work Groups under the North American Numbering Council (NANC – an advisory group to the FCC) including "The Future of Numbering" studying the impact of Voice over Internet Protocol (VoIP) and a tri-hair on "Numbering for Relay Services for the Deaf and Hearing Impaired" an IMG to research financial and public impacts that were out of scope for the INC committee mentioned above.
- Worked on or chaired several industry committees managing processes to implement Area Code splits or overlays across the country working in cooperation with state regulatory agencies/commissions and also co-ordination of engineering and public education efforts within the Telecom Industry.
- Managed internal processes at Sprint/Nextel for area code splits and overlays coordinating efforts of Network Engineering, Customer Ops (Databases), Public Relations, Customer Communication, and Regulatory groups.
- Ensured connectivity for the Nextel Michigan market to the Enhanced 911 system (e911) to provide cell site and cell phone location data to 911 dispatchers for emergency calls.
- Developed an inventory management process to maintain phone number inventories for Nextel Sales within the Nextel Michigan market while complying with FCC regulations. Later, I standardize this process for all 20 Nextel Markets across the U.S.
- At the inception of "Wireless Number Portability" (the ability port or to take your phone number to another carrier), I was a key member of the Nextel Implementation Team. At startup and for several months after, as part of Nextel's internal protocol for portability issues, I was the final escalation for problem resolution. Since this was new technology and new databases for the Telecom Industry, there was no "Play Book" with answers for resolution, these were new solutions to new problems.

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Other N11 Related connections:

- Since working at the VA (2012) I have been involved with 711 on 2 occasions.
  - The FCC gave the 711 Call Center Administrator my name to assist in resolving a problem with calls from Sprint Phones using the 711 Phone Number on the East Coast of the U.S. I advised him I no longer worked for Sprint but was able to give him the name and number of a former colleague who was able to resolve the problem.
  - A U.S. Veteran in the U.S. Territory of Northern Mariana Islands (NMI) contacted his Congressman about an issue of 711 not working in the VAMC and surrounding areas for several weeks. That report flowed to the VA Secretary, OI&T and eventually to me. I contacted a former colleague at the North American Numbering Plan Administration (NANPA) who sent an email to all carriers in NMI and the problem was resolved in 24 hours.
- My wife, Dr. Marcella Wilson, is on the Michigan 211 Board of Directors related to her work with Social Service programs for people (including Veterans) living in poverty. I have had occasion to discuss the United Way, Michigan 211 Call Center Technology and usage with the United Way, Michigan 211 Director. He was also very knowledgeable about United Way 211 programs nationwide and may be a resource going forward. My wife advocates use of 211 in her development of a National Standard of Care to address Social Determinates of Health for people living in poverty.

U.S. Air Force Veteran (1972-1975)