# FCC Public Comment Instructions

# National Suicide Hotline Improvement Act of 2018

# **DUE DECEMBER 10, 2018**

## About Public Comments

United Way has a long history of submitting public comments for consideration, and while many of us have taken part in those efforts along the way, the continued importance of federal public comment letters cannot be understated. These letters are an important opportunity to voice concerns on proposed changes to programs – to raise awareness of the potential impacts on the people we serve. Particularly, comment letters become part of the public record, and by law, the agency – in this case the FCC—must address the concerns raised in the letters. In the long term, public comments matter as well-- if a regulatory agency moves forward despite public opposition, the matter can be raised in federal courts.

## Drafting Public Comment

* [Use the letter](#_[TEMPLATE_LUW_COMMENT) following these instructions as a template to draft a public comment on behalf of your United Way.
* Once finalized, place on your letterhead, save as a PDF, and submit as a comment via the FCC public comment platform.
* You can reference the official United Way Worldwide comment on the Act which, will be submitted via the FCC public comment platform, as a guide.

## Submitting Public Comments

Please follow these simple steps when submitting your public comment to the FCC.

**Comment deadline is midnight EDT on Monday, December 10, 2018.**

1. Click: <https://www.fcc.gov/ecfs/filings>
2. In the Proceeding(s) field, type: **18-336**. Make sure the preview says, 'Implementation of Suicide Hotline Improvement Act of 2018' and click to select. The 18-336 should then be visible in gold in the field.
3. In the same Proceeding(s) field, type **92-105**. Make sure the preview says, 'The Use of N11 codes and other abbreviated dialing arrangements' and click to select. The 92-105 should then be visible in gold in the field as well. **The field, when complete, should read: [18-336] [92-105] in two gold boxes.**
4. Complete all subsequent required fields as well as a few others listed below:
   * Name of filer = CEO name, title
   * Primary contact email = CEO email
   * Type of filing = “comment”
   * Address of = “filer”
   * Address, Address 2, City, State, Zip = United Way address
5. Upload your comment via PDF file in the 'Upload Document' section. **As is shown in the UWW Comment and local template, remember to:**
   * Use official letterhead
   * Use a business letter heading and format
   * Address the Secretary of the FCC
   * Identify yourself and sign as the CEO of your United Way
   * Reference BOTH docket numbers in the header **(WC Docket No. 18-336 and CC Docket No. 92-105)**
   * Submit your comment by **midnight EST December 10th**

## Overview of the National Suicide Hotline Improvement Act of 2018

“The National Suicide Hotline Improvement Act of 2018 (Act) was signed into law on August 14, 2018. The Act directs the FCC to (1) 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; and (2) analyze how well the current National Suicide Prevention Lifeline is working to address the needs of veterans. The Act also directs the FCC to coordinate with the Department of Health and Human Services’ Substance Abuse and Mental Health Services Administration, the Secretary of Veterans Affairs, and the North American Numbering Council in conducting the study, and to produce a report on the study by August 14, 2019.3 The FCC’s report must recommend whether a particular N11 dialing code or simple, easy-to-remember, 3-digit dialing code should be used for a national suicide prevention and mental health crisis hotline system and, if so, the logistics and costs associated with designating such a dialing code, among other issues.” [[1]](#footnote-1)

## Questions About the Act or Submission Process?

## Please join the UWW Public Policy and 211 Teams for open office hours on Wednesday, December 5 from 3:00-4:00 PM EDT and Friday, December 7 from 1:30-2:30 PM EDT.

**Dial-In: (402) 875-6628**

**Code: 961 411 7580**

If you are unable to attend the office hours and have outstanding questions, please email [rachel.krausman@uww.unitedway.org](mailto:rachel.krausman@uww.unitedway.org).

## [TEMPLATE LUW COMMENT LETTER FOR FCC SUBMISSION]

December 3, 2018

Marlene H. Dortch, Secretary

Office of the Secretary

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

Re: WC Docket No. 18-336 and CC Docket No. 92-105 regarding the National Suicide Hotline Improvement Act of 2018.

Dear Madam,

[Local UW Name] appreciates the opportunity to comment on the current effort undertaken by the Federal Communications Commission to study the feasibility of designating a three-digit number to the National Suicide Hotline and to assess the effectiveness of the current National Suicide Prevention Lifeline. In [local jurisdiction], our United Way is fighting for the health, education and financial stability by investing in 211 and [mention a couple of specific priority areas of your community impact work.].

We acknowledge efforts are needed to create a safe place for all people to call – especially underserved or marginalized populations such as seniors, people with physical or intellectual disabilities, people that identify as LGBTQ+, Veterans, American Natives, non-English speakers, and individuals facing complex problems such as substance/opioid use, human trafficking, and domestic violence. Our organization has a [how long your organization has been in existence] history of reaching out to the underserved and today we partner with [number of businesses, nonprofit agencies, gov’t stakeholders] to drive systemic changes to solve our community’s toughest problems like mental health and crisis.

We encourage the FCC to consider our 211 work here in [name of jurisdiction] as a vital partner in increasing access to suicide prevention and intervention services. Since the FCC designation of 211 in 2000, we have invested [rough sum investment of your UW to 211 in the last 18 years] to the success of 211 and answer [approximate annual call volume] requests for help each year. Moreover, each year our United Way invests more than [annual total CI investment] in mental health, substance use, health, education, and other financial stability services. These critical investments position us to be key partners in the success of an improved mental health and crisis response system.

Another three-digit code may erode the simplicity of a single point of access for community help. Despite concerted efforts by numerous social services, and multiple hotlines, in our community to educate and market the distinctions, a person in crisis will likely always reach for the most familiar or most accessible number. Our 211 receives calls that are better suited for 911, and our 911 partners often receive calls that we can best answer. We recommend that resources should be invested to improve a unified single point of access with a blended partnership of the National Suicide Prevention Lifeline and United Way’s 211 services. We believe in the power of partnership to address gaps, not duplicate services, and will be a valuable partner in the fight against suicide.

You can learn more about our work at [insert website for United Way and/or 211], and can reach my office for additional questions or discussion at [insert office number]. Thank you for your time in addressing this important issue and for your consideration.

Sincerely,

[CEO Name, Title]

1. <https://www.fcc.gov/document/wcb-seeks-comment-implementation-suicide-hotline-improvement-act> [↑](#footnote-ref-1)