



State of Utah

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DEPARTMENT OF HUMAN SERVICES

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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket 18-336

Implementation of the National Suicide Hotline Improvement Act of 2018

The Utah Division of Substance and Mental Health believes that by making the National Suicide Prevention Lifeline system more user-friendly and accessible, we can save thousands of lives by helping people find the help they need when they need it most. As recently reported by the Center for Disease Control (CDC) there were over 47,000 deaths by suicide in America in 2017. The National Suicide Prevention Hotline is one of nation's most important tools in reversing this troubling trend and having a 3-digit number will increase the likelihood of use when it is needed most.

We encourage the FCC to consider designating "611" as the new National Suicide Prevention Hotline number. Of the existing eight N11 numbers, two of them have not been officially designated by the FCC for a particular use (411, 611). Currently 411 is in widespread use for directory assistance. It is estimated that this number is used literally billions of time annually. Though this is one of the two undesignated numbers that could be used, from a practical perspective this would not be a logical choice to designate for suicide prevention purposes due to its current widespread usage. Thus only one undesignated number remains in the N11 schematic that is realistically available, which is 611. This number is currently used on a limited basis for telephone repair and telecom customer service. Though it would be an inconvenience for certain telecom providers to cease the use of this number, many telecom services are now offered through wireless carriers without having to even dial a number. When compared with the national importance of designating a simple, easy to remember, three digit dialing code I would sincerely hope that our friends in telecom would embrace the designation of 611, similar to their support of 911 back in the early 60's.

Since 1968 this country has used 911 for emergency services. It is also used by many individuals experiencing a mental health crisis. Often people in crisis just need someone to speak with instead of having law enforcement or emergency services dispatched to their location. This type of call is much better directed to the National Suicide Prevention Lifeline, which can work with emergency services if the acuity of the call requires an in person response. The benefit of using 611 is that it is similar to 911 in its format and in the ability to easily remember the number. National marketing campaigns to help educate the public that 911 is for physical health emergencies and that 611 is for mental health emergencies could help immensely in offloading mental health calls to 911 dispatchers. This would undoubtedly be a welcome relief to frequently overburdened dispatchers and first responders.

We would oppose the use of an N11 number for a dual purpose for several reasons. An individual in crisis needs to speak with a crisis counselor as soon as possible. If for instance the FCC recommended using 211 for the National Suicide Prevention Lifeline, in addition to providing information to human and social service organizations as it is currently used for, it would unnecessarily delay millions of annual calls that currently come into the existing National Suicide Prevention Lifeline and burden the caller with having to navigate a phone tree. It would also be much more

difficult to market the National Suicide Prevention Lifeline if the number was used for dual purposes. Additionally using characters other than digits for the three digit dialing code, such as the star (*) key, would be confusing and be much harder for individuals in crisis to remember. We believe that the designation of a three digit dialing code that would otherwise be used for a new area code would unnecessarily eliminate millions of potential phone numbers and would not fit the standard as stated in the bill of being an easy to remember phone number.

Thank you for your consideration of our concerns and recommendations. We believe 611 is a simple easy to remember number and is best option for the three digit dialing code for the National Suicide Prevention Lifeline. This undertaking is of utmost national importance and has the ability to help connect millions of Americans, including veterans and other vulnerable individuals that find themselves in crisis, with life-saving resources.

Sincerely,



Doug Thomas, MSW LCSW

Division Director

Utah Division of Substance Abuse and Mental Health