

# United States Congress

December 10, 2018

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

Dear Ms. Dortch,

As sponsors of the National Suicide Hotline Improvement Act (Pub. L. No. 115-233), welcome the opportunity to provide comments with regard to WC Docket No. 18-336 and CC Docket No. 92-105. We believe that by making the National Suicide Prevention Lifeline more user-friendly and accessible, we can save thousands of lives by helping people find the help they need when they need it most. Every minute we wait, we leave helpless hundreds of Americans who are struggling with suicidal thoughts. As recently reported by the Centers for Disease Control and Prevention (CDC), there were over 47,000 deaths by suicide in America in 2017. These deaths contribute to shorter life expectancies for Americans. As the director of the CDC, Robert Redfield, recently said, "These sobering statistics are a wake-up call that we are losing too many Americans, too early and too often, to conditions that are preventable." The National Suicide Prevention Lifeline is one of nation's most important tools in reversing this troubling trend.

We strongly encourage the FCC to consider designating "611" as the new National Suicide Prevention Lifeline telephone number. Of the existing eight N11 numbers, two of them have been designated by the Federal Communications Commission (FCC) at the request of Congress for a particular use (811, 911), four have been designated for a particular purpose by the FCC without congressional mandate (211, 311, 511, 711) and 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 billions of time annually, making it impractical to use the number for the National Suicide Prevention Lifeline.

Thus 611 is the only undesignated, realistically available N11 number. This number is currently used on a limited basis for telephone repair and telecom customer service. In 1997, the FCC noted that the use of 611 "appears to be far less ubiquitous than use of 411 for directory assistance" and concluded that the code could continue to be used to facilitate repairs and customer service "until [it] is needed for other national purposes."<sup>1</sup> We firmly believe that making the National Suicide Prevention Lifeline more accessible and user-friendly is such a pressing, national purpose.

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<sup>1</sup> First Report and Order and Further Notice of Proposed Rulemaking at ¶ 45, The Use of N11 Codes and Other Abbreviated Dialing Arrangements, FCC 97-51 (Feb. 18, 1997), [https://transition.fcc.gov/Bureaus/Common\\_Carrier/Orders/1997/fcc97051.pdf](https://transition.fcc.gov/Bureaus/Common_Carrier/Orders/1997/fcc97051.pdf).

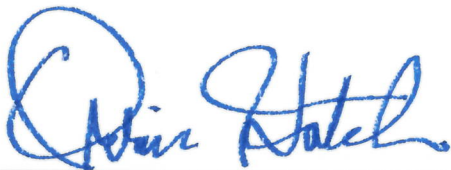
Although it may be possible to designate an N11 number for dual purposes, we would oppose any such designation for the National Suicide Prevention Lifeline. An individual in crisis needs to speak with a crisis counselor as soon as possible. They should not be forced to navigate a phone tree, unnecessarily delaying the millions of calls received annually by the National Suicide Prevention Lifeline. It would also be more difficult to market the National Suicide Prevention Lifeline if the number was used for dual purposes.

It may also be possible to use a three digit number other than an N11 number. But the designation of another three digit dialing code, which otherwise would be used for a new area code, would unnecessarily eliminate millions of potential phone numbers and would not align with our intent of identifying a simple, easy-to-remember phone number for the National Suicide Prevention Lifeline. We do not believe that a combination of digits and characters outside of the N11 schematic would be easy-to-remember or consistent with the intent of the National Suicide Hotline Improvement Act.

Connecting with mental health services should be as easy as calling for police, fire, or emergency medical services. Since 1968, 911 has been used to access emergency services. In the absence of a widely known alternative, 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. 911 dispatchers typically do not have the time or training needed to work with individuals experiencing a mental health crisis. This type of call is much better directed to the existing National Suicide Prevention Lifeline, which can work with emergency services if the acuity of the call requires an in-person response. Through designation of 611 for the National Suicide Prevention Lifeline and a national marketing effort to educate the public that 611 would be available for mental health emergencies, we can simultaneously improve access to mental health services and relieve overburdened 911 dispatchers.

In summary, we believe 611 is a simple, easy-to-remember number and is the 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 that find themselves in crisis, with life-saving resources. Thank you for your consideration of our comments and recommendations.

Sincerely,



Orrin G. Hatch  
United States Senator



Chris Stewart  
United States Congressman