**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, DC 20554**

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| In the Matter of | ) | |
| | ) | |
| Petition of Care2, Inc. for the Use of | ) | RM-11746 |
| an N11 Code or Other Abbreviated | ) | |
| Dialing Code for Nationwide Suicide | ) | |
| Prevention | ) | |

**REPLY OF CENTURYLINK**

The Commission Should Decline To Grant The Petition For Rulemaking Filed By Care2, Inc.

CenturyLink[1] files this Reply in response to the earlier-filed comments of the Alliance for Telecommunications Industry Solutions (ATIS) on behalf of its Industry Numbering Committee (INC).[2] ATIS was responding to a *Public Notice*[3] that sought comments on a *Petition for Rulemaking* (Petition) filed by Care2, Inc. (Care2).[4] In its Petition, Care2 asked the Commission to establish an N11 Code or other abbreviated dialing code for suicide and crisis hotlines,[5] focusing particularly on the three-digit codes of 811 and 611.[6]

For the reasons discussed below, the Commission should decline to grant Care2's Petition. That Petition seeks access to and utilization of N11 codes that are not available. And while Care2 references the potential use of the currently-assigned 211 code to support the needs

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[1] This reply is filed by and on behalf of CenturyLink, Inc. and its LEC affiliates.

[2] Comments of the Alliance for Telecommunications Industry Solutions, RM No. 11746, filed May 11, 2015 (ATIS Comments).

[3] *Consumer & Governmental Affairs Bureau Reference Information Center Petition for Rulemaking Filed*, RM-11746, Public Notice, Report No. 3018 (Apr. 9, 2015).

[4] Care2, Inc. Petition for Rulemaking, filed Feb. 24, 2015 (Petition).

[5] Petition at p. 1.

[6] *Id*. "[a]lthough all N11 numbers are in use to some degree, 611 or 811 are not officially assigned and could potentially be put into formal use for this life-saving purpose."

that it seeks to meet, it argues that a more "permanent, national, and well known" dialing pattern would be a superior solution.[7] CenturyLink disagrees as the Commission anticipated 211 being used with respect to crises interventions, including those involving suicide discussions or threats. Moreover, it would be inefficient and costly for carriers to attempt to implement additional N11 code functionalities in their TDM networks as they are migrating to IP-based platforms and networks. Those IP networks will undoubtedly provide more efficient solutions to address the concerns raised by Care2's Petition.

All N11 Codes Are Currently In Use

As ATIS pointed out in its comments, Care2 seems unaware that in 2005 the Commission officially assigned the N11code of 811 as a national abbreviated dialing code to be used by state One Call notification systems to provide advanced notice of excavation activities in compliance with the Pipeline Safety Act of 2002.[8] Accordingly, that code is not available for re-assignment for the purposes Care2 is pursuing.

And the 611 code, while not currently officially assigned, has long been recognized as widely used by carriers both wireless and wireline. As the Commission observed as far back as 1997, the 611 code is used by carriers in connection with their repair services.[9] This acknowledgement was reiterated in the *Sixth Report and Order*, where the Commission stated

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[7] Petition at p. 3.

[8] *See* ATIS Comments at p. 2. *See also In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket No. 92-105, *Sixth Report and Order*, 20 FCC Rcd 5539 (Mar. 15, 2005) (*Sixth Report and Order*).

[9] *In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket No. 92-105, *First Report and Order and Further Notice of Proposed Rulemaking*, 12 FCC Rcd 5572, 5574 ¶ 2, 5599 ¶¶ 45-46 (1997) *(N11 First Report and Order and FNPRM*, allowing continued use of 611 to access LEC repair offices).

that "611 . . . [is] widely used by carriers[.]"[10] "For example . . . wireless customers may dial 611 or *611 for repair while wireline users may dial 611 for customer service."[11] Indeed, the NANPA associates the 611 code with "Repair Services," as the ATIS filing demonstrates.[12]

For all practical purposes there are no N11 codes available for an assignment such as that proposed by Care2. For over a decade, the Commission has concluded that only two N11 codes were available for assignment: 211 and 511.[13] And in 2000, the Commission assigned both of these codes. Of particular relevance here is the assignment of 211 for access to community information and referral services. That assignment was in connection with a Petition filed by the Information and Referral Petitioners for the assignment of an N11 code on the grounds that there were "needs not addressed by either the 911 code or police non-emergency 311 code such as housing assistance, maintaining utilities, food, finding counseling, hospice services and services for the aging, substance abuse programs, or dealing with physical or sexual abuse."[14] The Commission found the assignment of the 211 code to be in the public interest because "[i]ndividuals facing serious threats to life, health, and mental well being have urgent and critical human needs that are not addressed by dialing 911 for emergency assistance or 311 for non-emergency police assistance."[15]

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[10] *Sixth Report and Order*, 20 FCC Rcd at 5559 n. 27.

[11] *Id.* at 5568 n. 97.

[12] ATIS Comments at p. 2.

[13] Comments Sought on Designation of 211 and 511 as Abbreviated Dialing Codes, CC Docket No. 92-105, Public Notice, 22 FCC Rcd 8600 ¶ 1 & n. 2 (May 7, 2007).

[14] *In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, et al*., CC Docket No. 92-105, *et al*., Third Report and Order and Order on Reconsideration, 15 FCC Rcd 16753, 16763 ¶ 17 (citation omitted) (2000).

[15] *Id*. at 16764 ¶ 18.

The Petition indicates that Care2 is exploring the potential use of 211 with respect to its suicide and crises intervention objectives. But it argues that using the 211 N11 code might be a "good idea" but not as ideal as having a more "permanent, national, and well-known . . . dedicated number just for suicide and crisis hotline purposes."[16]

CenturyLink believes that utilization of the 211 dialing pattern to achieve Care2's objectives is more than a good idea. It is exactly the kind of easily-dialed code that Care2's Petition seeks. Indeed in assigning 211, the Commission specifically anticipated that the code dedication would meet a variety of human and social service needs, including those associated with crises interventions, and potential suicide threats. The Commission stated that in real-life situations where the 211 dialing pattern was in use, calls to the N11

> presented issues relating to counseling, medical aid, prescription assistance, physical and sexual abuse, and potential suicide. Other less urgent situations, also not addressed by 911 service or the current 311 service, might involve persons needing child care solutions, aging and hospice services, adolescent activities, educational programs, support groups, legal assistance, child and spousal abuse counseling, substance abuse programs, and other needs vital to the welfare of individuals, families, and communities.[17]

The Commission should decline to grant the Petition on the grounds that an existing N11 is already available to meet the needs of the Petitioners.

<u>Carriers Should Not Be Asked To Deploy New Dialing Patterns In Their Aging TDM Networks</u>

In addition to the fact that existing N11 codes are currently being utilized, some of them for purposes that support crisis intervention initiatives, there are other reasons to decline the Petition. It has been years since the Commission last ordered carriers to implement N11 codes in their networks. Since that time, increasingly carriers' switching and supportive equipment has

[16] Petition at p. 3.

[17] *Id*. (footnote omitted).

been characterized as not being supported by manufacturers. And, as the Commission is aware, carriers are now focused on deploying IP-based networks and equipment. It would be a diversion of both financial and human resources for the Commission to undermine those carrier efforts by attempting to implement a dialing pattern in the aging TDM network. Additionally, in the all IP network, there will likely be means other than the use of N11 codes to more efficiently accommodate the type of applications the Care2 Petition raises.

For these reasons, the Commission should decline to pursue the relief requested by Care2 at this time.

Respectfully submitted,

**CENTURYLINK**

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