

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

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In the Matter of)	
)	
SAMHSA Petition for Permanent Reassignment of Three Toll Free Suicide Prevention Hotline Numbers)	CC Docket No. 07-271
)	
Toll Free Service Access Codes; KBHC's Application For Review)	CC Docket No. 95-155
)	

DECLARATION OF H. REESE BUTLER II

1. My name is H. Reese Butler II and I am the President & Founder of the Kristin Brooks Hope Center ("KBHC"). As the President, I oversee the day-to-day operations of KBHC with the oversight of KBHC's Board of Directors. I founded KBHC as a means of paying tribute to my wife following my wife's suicide in 1998 after a battle with postpartum depression. Since its founding, KBHC has grown in size and scope, and now operates 11 nationwide toll-free telephone numbers that help callers in crisis reach critical counseling services. These include lines for the general public, such as 800-442-HOPE, as well as specialized lines for specific populations, such as military veterans, new mothers, and others. Prior to the recent reassignment of 1-800-SUICIDE, 1-888-SUICIDE, and 1-877-SUICIDA ("the suicide prevention hotlines"), KBHC operated those numbers for more than seven years. During that time more than 3 million calls were received and the lines were credited with saving thousands of lives.
2. I make this Declaration based on personal knowledge, unless otherwise indicated.

3. I have read the attached letter from Danny E. Adams, Counsel for the Kristin Brooks Hope Center, to Michael J. Copps, Acting Chairman of the Federal Communications Commission, and can attest to the accuracy of the facts stated therein.
4. Specifically, I can attest to the facts regarding the costs of operating the suicide prevention hotlines and KBHC's own financial situation. Based on my experience operating the disputed numbers and more than ten other toll-free numbers as the President of KBHC for the last eleven years, SAMHSA's cost estimates for the telecommunications services necessary to support the volume of calls to the suicide prevention hotlines are inflated and misleading. In fact, KBHC can obtain these services for an average of \$10,000 per month, which KBHC is able to pay indefinitely.

Synopsis of the Micktel Agreement

5. KBHC already has retained telecommunications services capable of supporting the suicide prevention hotlines. On April 21, 2009, KBHC entered into an agreement with Micktel Corp. for the purposes of establishing a formal cooperative relationship to provide telecommunications services to support the suicide prevention hotlines. As part of the agreement, Micktel has agreed to assume responsibility for obtaining the telecommunications services that underlie the suicide prevention hotlines. Services provided by Micktel include routing, reporting, real-time call tracing, and access to Micktel's call center management tools, which include logging tools to determine call volume, caller demographics, and referrals.

6. Micktel has negotiated a rate that will result in KBHC being charged a rate of \$0.057 per minute for all calls to the suicide prevention hotlines. At the current rate of approximately 20,000 calls per month and an average call length of eight minutes, the average monthly bill is expected to be approximately \$9,100. KBHC also will continue its cooperative relationship with Option Line, which became effective March 20, 2008, and provides the same services and rates offered by Micktel. The combination of the Micktel and Option Line agreements provides redundancy for KBHC and places KBHC in a position to choose its vendor.

SAMHSA's Estimation of Its Expenses Demonstrate Its Inefficiency

7. Eric Broderick, Deputy Administrator for SAMHSA, states in his declaration of June 25, 2008, that "telephone services to support [a] call volume of more than 20,000 calls monthly costs an average of \$28,320 monthly." Assuming that the average length of a call to the suicide hotlines is eight minutes, that amounts to more than \$0.17 per minute. Based on my more than eleven years of experience operating these and other hotlines, there are numerous carriers who offer rates significantly lower than that obtained by SAMHSA.
8. SAMHSA also conflates its support of the crisis centers to which the suicide prevention hotlines route callers with the operation of the hotlines itself. KBHC has never paid crisis centers to take calls to the numbers it routes. Rather, the crisis centers are paid for by the communities in which they operate to take the calls from members of that community. The suicide prevention hotlines function as a single number that can be used to reach local crisis centers through the use of geo-routing software. Although SAMHSA's support of the crisis centers

themselves is laudable, it is unrelated to the operation of the suicide prevention hotlines themselves. The hotlines perform merely a routing and transmission function.

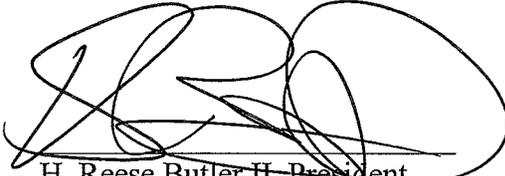
KBHC's Finances And Fundraising Efforts

9. KBHC no longer has any significant debts or liabilities. KBHC resolved all of its payment disputes with Patriot Communications in January 2007. Furthermore, KBHC entered into a final settlement agreement with AT&T in May 2008, that resolves all claims between the two companies; the final payment under that settlement occurred on August 16, 2008. As such, KBHC's operation of the suicide prevention hotlines will be unencumbered by any debts previously owed by KBHC.
10. KBHC's strong fundraising efforts ensure that KBHC will be able to operate the suicide prevention hotlines for the foreseeable future. In February 2009, KBHC partnered with Fuel Records to support KBHC's "Pick Up the Phone Tour" in the Spring of 2009. Fuel Records has agreed to produce and sell a CD compilation at concerts during the tour, donating 100 percent of the royalties to KBHC. Fuel Records and KBHC estimate that net proceeds from the tour will total more than \$250,000. KBHC's previous tours have raised an average of \$100,000 each year for KBHC since it first began organizing them in 2001. In another fundraising effort, KBHC raised for its own use more than \$30,000 in just five days in partnership with other suicide prevention organizations PostSecret and To Write Love on Her Arms. KBHC also has been the recipient of repeat grants from BMS, AstraZeneca, Pfizer, and Forrest Labs. Finally, KBHC has launched its 99

Club Fund Raising program, and already has more than 200 volunteers and civic organizations pledged to contribute more than \$990,000 over the next year. Free of past debts and funded by the fruits of these efforts, I can assure the FCC that KBHC will be able to operate all its toll-free numbers, including the three temporarily operated by SAMHSA, without interruption long into the future.

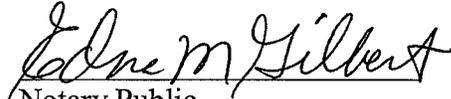
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and information and belief.

June 15, 2009



H. Reese Butler II, President
Kristin Brooks Hope Center

SUBSCRIBED and SWORN TO before me on this 15th day of June, 2009



Edna M. Gilbert
Notary Public

My Commission Expires: 6-30-2011

EDNA M. GILBERT
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires June 30, 2011