

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Implementation of the National Suicide ) WC Docket No. 18-336  
Hotline Improvement Act of 2018 )

**REPLY COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION**

NTCA–The Rural Broadband Association (“NTCA”)<sup>1</sup> hereby submits these reply comments in response to the Public Notice<sup>2</sup> issued by the Federal Communications Commission’s (“Commission”) Wireline Competition Bureau in the above-captioned proceeding. The Public Notice seeks comment, for the purposes of a Commission report to Congress as called for by Section 5 of the Suicide Hotline Act,<sup>3</sup> on the costs and feasibility of conveying dispatchable location information with respect to a call placed to the 988 National Suicide Prevention Lifeline (“Lifeline”). As the record in response to the Public Notice indicates, providing location information with a 988 call will require resolution of many technical, funding, and policy challenges. These challenges will be above and beyond those related to the current transition to 988 as the dialing code for the Lifeline, as comparable issues already exist and are being considered with respect to 911 location identification. Ensuring that these issues are properly cared for is vital to the health and safety of those in need of the Lifeline,

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<sup>1</sup> NTCA represents approximately 850 rural local exchange carriers (“RLECs”). All of NTCA’s members are voice and broadband providers, and many of its members provide wireless, video, and other competitive services to their communities.

<sup>2</sup> *Wireline Competition Bureau Invites Comment on Costs and Feasibility of Providing Location Information for 988 Calls and Clarifies 988 Implementation Date*, WC Docket No. 20-1378, Public Notice, DA 20-1378 (rel. Nov. 19, 2020).

<sup>3</sup> National Suicide Hotline Designation Act of 2020, Pub. L. No. 116-172 (“Suicide Hotline Act”).

and the Commission should provide Congress with a full picture of the challenges involved. The Commission should further inform Congress that a North American Numbering Council (“NANC”) working group should be tasked with undertaking and reporting upon a full assessment of the challenges that must be addressed here.

With respect to the importance of conveying dispatchable location information with a 988 call, Mental Health America states that “[p]roviding location information for 988 calls will help ensure that individuals will be routed to the local crisis center nearest to their physical location, keeping the important linkages to local care resources.”<sup>4</sup> As other parties noted in initial comments, routing 988 calls to local crisis centers allows for both callers’ access to local resources but also rapid mobilization of emergency services where callers need them.<sup>5</sup>

Ensuring that accurate location information is conveyed with a 988 call, and that such calls are routed properly to the appropriate local crisis center, will involve multiple stakeholders and technological hurdles. However, it must be remembered that the industry is just beginning the transition to the use of 988.<sup>6</sup> As USTelecom points out, “[t]he record in this proceeding is replete with detailed information on the technical and operational complexity associated with a nationwide implementation of 988 for legacy wireline networks.”<sup>7</sup> Wireless carriers likely face challenges as well, and the successful, nationwide implementation of 988 as the dialing code for the Lifeline should be viewed as a prerequisite to further consideration of the issues raised in the

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<sup>4</sup> Mental Health America, p. 1.

<sup>5</sup> See American Foundation for Suicide Prevention, p. 1; The Trevor Project, pp. 1-2; the National Alliance on Mental Illness, pp. 1-2.

<sup>6</sup> *Implementation of the National Suicide Hotline Improvement Act of 2018*, WC Docket No. 18-336, Report and Order, FCC 20-100 (rel. Jul. 20, 2020), ¶ 27 (requiring “all covered providers to fully implement 988 in their networks by July 16, 2022.”).

<sup>7</sup> US Telecom, p. 2.

instant Public Notice. Any routing or other technical issues that arise with this transition must be accounted for and resolved before tackling the next challenge of conveying location information with 988 calls.

With respect to the provision of location information with a 988 call once this nationwide implementation has occurred, the record in response to the Public Notice shows that a number of technical and logistical issues may arise. USTelecom points to the complications that arise with translating a 988 call into a toll-free call destined to be routed to the Lifeline, as well as the lack of a comprehensive Automatic Location Identification database.<sup>8</sup> CTIA notes that while wireless carriers have taken steps to support the provision of location information to Public Safety Answering Points, additional significant investment will need to be made in the “entire mobile wireless ecosystem—including network equipment, handsets, and operating systems.”<sup>9</sup> NTCA members all across the nation, including, but most certainly not limited to, remote areas in Alaska and on tribal lands, have reported that the lack of physical street addresses in remote portions of most states will pose a challenge as well.

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<sup>8</sup> USTelecom, pp. 5-6 (“[I]n the TDM context, location information for 911 calls is typically associated with a customer’s dedicated line. But, in the 988 context, the translation of a 988 call into a toll-free call destined to the Lifeline complicates this process because similar location information is not typically signaled with a toll-free call. Presently there is no single, comprehensive national ALI database, so access to multiple ALI databases would likely be needed, which entails associated costs and implementation requirements that would need to be more fully explored. Requiring such information be included may necessitate development work, and the nature and extent of the requisite development work must be thoroughly evaluated.”).

<sup>9</sup> CTIA, p. 4 (“Wireless providers and handset manufacturers have invested significant resources over many years to support the existing automated location information process for 9-1-1 on handsets and networks. While the general capability to provision location information with 9-1-1 calls may be useful for 9-8-8 calls, there will likely be many unknown technical issues that will need to be considered before 9-8-8 can be added to the “emergency mode” call flow, including the scope of existing handsets that may be capable of supporting any new 9-8-8 calling features. Given that automated location provision is limited to 9-1-1 calling today, the Commission should recognize in its report to Congress that the entire mobile wireless ecosystem—including network equipment, handsets, and operating systems—would need to invest significant resources in order to support the provision of automated location information with calls to 9-8-8.”).

Beyond these technical and network upgrade challenges, commenters also point to a number of policy issues that must be addressed. For one, privacy concerns arise with the provision of location information with a call to 988 – as CTIA notes, it is not clear whether exceptions to the protections offered to consumers via Section 222 of the Communications Act apply.<sup>10</sup> The National Alliance on Mental Illness states that the “[f]ailure to ensure the privacy of callers may damage trust in 988 and discourage help-seeking.”<sup>11</sup> In addition, it is not clear whether crisis centers receiving 988 calls have the ability to utilize location information.<sup>12</sup> The costs of obtaining this capability on the part of the local Lifeline call centers could be substantial. As US Telecom correctly states, “[i]n addition to pinpointing the actual underlying costs, the Commission should also acknowledge the need to identify a source of funding those costs incurred by *all* stakeholders, not just the Lifeline.”<sup>13</sup>

To be sure, none of these technological, funding, or policy issues are insurmountable – they must, however, be the subject of thoughtful evaluation for the protection of those in a time of crisis as they utilize the Lifeline. While the Public Notice seeks input from individual NANC members,<sup>14</sup> the Commission should recommend the creation of a working group of that body to explore these issues in detail. The collective NANC membership has decades of experience in many of the technical issues discussed herein, and thus this body has the ability to pinpoint the operational hurdles (and solutions to them) that will arise with the provision of location

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<sup>10</sup> *Id.*, p. 5.

<sup>11</sup> National Alliance on Mental Illness, p. 2.

<sup>12</sup> USTelecom, p. 6.

<sup>13</sup> *Id.*, p. 8 (emphasis added).

<sup>14</sup> Public Notice, p. 1.

information with a 988 call. That body can also identify where funding will be necessary and where the development of technical standards may be necessary. The NANC is also already versed in this issue from previously considering and reporting to the Commission on the feasibility of using a N11 code for access to the Lifeline.<sup>15</sup> The Commission should specifically indicate in its report to Congress that a new NANC working group will be formed to explore the issues raised by commenters as the first step towards providing location information with a 988 call.



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<sup>15</sup> See Report and Recommendation on the Feasibility of Establishing a 3-Digit Dialing Code for a National Suicide Prevention and Mental Health Crisis Hotline from Travis Kavulla, Chair, North American Numbering Council, to Kris Anne Monteith, Chief, FCC Wireline Competition Bureau, WC Docket No. 18-336, CC Docket No. 92-105, at 6-19 (May 10, 2019).