

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

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

**COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) Industry Numbering Committee (INC) hereby submits these comments in response to the *Notice of Proposed Rulemaking (NPRM)* released December 16, 2019, in the above-referenced docket. As the key developer of industry guidelines related to the use and management of numbering resources, ATIS INC is pleased to have the opportunity to respond to this proceeding.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS’ diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry –wireless, wireline, and Voice over Internet Protocol (VoIP) service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the Long Term Evolution (LTE) and LTE-Advanced

wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

INC addresses and resolves industry-wide issues associated with planning, administration, allocation, assignment, and use of the North American Numbering Plan (NANP) numbering resources within the NANP area. INC guidelines and recommendations are used by the North American Numbering Plan Administration (NANPA), the Number Pool Administration (PA), and the Canadian Radio Television and Telecommunications Commission (CRTC) in the management of numbering resources.

II. COMMENTS

In the *NPRM*, the Commission seeks comment on the designation of “988” as the three-digit code for a national suicide prevention and mental health crisis hotline. As ATIS INC noted in its comments on the November 2018 *Public Notice* on this matter, it supports efforts to reduce the risk of suicide and believes that facilitating access to resources such as health crisis hotlines is an important goal.¹ INC also noted that creating a new, easily recognizable three-digit code (using repeating or sequential numbers) could potentially be implemented more quickly and with less risk of confusion than *repurposing* an N11 code.²

The Commission notes that “[d]esignating 988 appears to provide the fastest, and therefore best, path to implementing a three-digit code.”³ ATIS INC notes that there are numbering related impacts associated with the use of 988 that should be considered. For example, using 988 as a three-digit abbreviated dialing code means that the 988 area code cannot be assigned, which prevents nearly 8 million numbers from being made available for assignment

¹ ATIS Comments at p.p. 2-3 in WC Docket No. 18-336 and CC Docket No. 92-105 (submitted Dec 10, 2018).

² *Id.* at p. 3

³ *NPRM* at ¶28.

to customers. Further, the NANPA has stopped assigning 988 as a central office code within geographic area codes in the U.S. and its territories to prevent exacerbating implementation challenges while 988 is being considered as a three-digit abbreviated dialing code for the hotline. This has the effect of making an additional 10,000 numbers unavailable for assignment from each of the 147 existing geographic area codes in the U.S. and its territories where 988 is not already assigned as a central office code, as well as in each of another 130 geographic area codes that are assigned but not yet in service or are reserved for future relief efforts within the next 10 years. Thus, designating 988 as the three-digit abbreviated dialing code for the hotline results in millions of numbers being unavailable for assignment to customers.⁴

The *NPRM* addresses and seeks comment on alternative proposals, including expanding 211 for the suicide prevention hotline.⁵ Many ATIS INC representatives believe that expanding 211 may have advantages over 988. As the *NANC Report and Recommendation on the Feasibility of Establishing a 3-Digit Dialing Code for a National Suicide Prevention and Mental Health Crisis Hotline System (NANC Report)* noted, some 211 centers already handle crisis calls and the current 211 system has interactive voice responses (IVRs) in place with options to direct callers to other crisis hotlines.⁶ The *NANC Report* also noted that about 94% of the U.S. already has access to 211. ATIS INC believes that service providers would be able to identify and

⁴ Currently, approximately 10.69 million numbers are unavailable for assignment to customers while 988 is being considered. This figure is calculated as follows: 7.92 million numbers from the 988 area code, plus 1.47 million numbers from the 988 NXX codes that cannot be assigned in 147 existing area codes, plus 1.30 million numbers from the 988 NXX codes that cannot be assigned in another 130 area codes that are assigned but not yet in service or are reserved for future relief efforts within the next 10 years. Data sources are iconectiv's LERG™ Routing Guide (description available at <https://trainfo.iconectiv.com/node/261#LERGRoutingGuide>) and NANPA's NPA Database available at https://www.nationalnanpa.com/reports/reports_npa.html. As 10-digit dialing is implemented through overlays, the 988 NXX codes could be made assignable in those overlay areas.

⁵ *NPRM* at ¶29.

⁶ *NANC Report and Recommendation on the Feasibility of Establishing a 3-Digit Dialing Code for a National Suicide Prevention and Mental Health Crisis Hotline System (NANC Report)*, released May 17, 2019, Sections 4.2.2 and 7.1.

implement 211 in unserved areas much more quickly than it would take to implement nationwide 988 for the hotline. ATIS INC also notes that expanding 211 eliminates the need for costly switch upgrades/replacements for legacy/TDM wireline service providers and the dialing changes associated with the use of 988 in more than 90 area codes that both still use seven-digit dialing and have assigned 988 as an NXX prefix.⁷ Implementation of 988 will also require programming of switches serving 100% of the nation versus the switches serving the remaining 6% of the U.S. for 211. This creates a significant difference in deployment time and resources required of many service providers.

The *NPRM* also seeks comment on the possible repurposing of 611 for the national suicide prevention hotline.⁸ ATIS INC agrees with the Commission's *Report on the National Suicide Hotline Improvement Act of 2018 (Staff 988 Report)* that repurposing 611, which receives nearly 300 million calls a year, could flood the hotline with misdirected calls, and create delays in answering crisis calls.⁹ Even with extensive and prolonged customer education over multiple years, ATIS INC believes that using 611 as a three-digit abbreviated dialing code for the national suicide prevention and mental health crisis hotline could still be inundated with misdirected calls that could prevent callers intending to reach the hotline from speaking to a counselor quickly.

ATIS INC recognizes that policymakers are primarily focused on 988, and the Commission in the *NPRM* appropriately seeks information on the specific tasks service providers need to complete to support 988, and how to achieve ubiquitous deployment.¹⁰ Implementing

⁷ ATIS INC notes that, regardless of whether 211 or 988 is selected, the call centers answering those calls will need to be appropriately staffed to handle the expected larger call volume that may result from the ease of three-digit access, and IVRs will be needed to expedite access to the appropriate counselor.

⁸ *NPRM* at ¶29.

⁹ *Report on the National Suicide Hotline Improvement Act of 2018, Prepared by the Wireline Competition Bureau Office of Economics and Analytics (Staff 988 Report)*, released August 14, 2019, p. 6.

¹⁰ *NPRM* at ¶35.

988 as a three-digit abbreviated dialing code would warrant a phased approach, rather than a nationwide flash cut, one that recognizes that some segments of the industry may have additional implementation challenges. A phased approach would be most effective in achieving this goal while minimizing disruptions to those networks, and to the consumers and businesses that use them. For example, wireless and VoIP implementation of 988 for the suicide prevention hotline would likely be easier and quicker to implement than in legacy/TDM wireline technologies, which in some areas will require time-consuming equipment modifications and replacements. Therefore, ATIS INC would recommend a phased approach to implementation related to the routing of hotline calls and the implementation of ten-digit dialing where necessary. Once all the implementation phases have been completed, the national suicide prevention lifeline organization and its partners can begin a national consumer education campaign to announce the availability of the 988 abbreviated dialing code to reach the national suicide prevention and mental health crisis hotline.¹¹

The *NPRM* asks whether there are trunking and/or network capacity requirements that carriers and providers would need to address in order to carry the expected increase in national suicide prevention and mental health crisis hotline calls.¹² ATIS INC notes that, while new trunking requirements are likely unnecessary, there may be network capacity concerns associated with the use of a three-digit code, such as 988. Trunking capacity to the national suicide prevention and mental health crisis hotline would likely need to be augmented if the implementation of the new three-digit code increases call volumes to the hotline.

¹¹ Confusion already exists over the availability of 988 to reach the suicide prevention hotline. This has prompted the National Suicide Prevention Lifeline to include a notice on its website that “988 is NOT CURRENTLY ACTIVE and will not connect callers to the Lifeline.” See <https://suicidepreventionlifeline.org/> [last visited: February 6, 2020].

¹² *NPRM* at ¶35.

The Commission proposes to require telecommunications carriers and interconnected VoIP providers to route 988 calls to the current toll free number, 1-800-273-TALK, for the Lifeline and the Veterans Crisis Line, noting that this approach appears to provide the most efficient means to establish 988 as a national suicide prevention hotline.¹³ ATIS INC agrees that this is the most efficient means for routing three-digit dialed calls to the hotline. In addition to the simplicity of programming the same number into all switches, this also provides the hotline with the benefit of flexibility for geographic routing as well as time of day routing that comes with the use of toll free routing capability.

The *NPRM* seeks input on how to address areas that use both seven-digit dialing and where 988 is in use as an NXX code.¹⁴ The Commission notes that one solution to address these areas is the introduction of a dialing delay after 988 is entered and seeks input on this proposed solution.¹⁵ ATIS INC strongly opposes the implementation of dialing delays. ATIS INC notes that some switches cannot accommodate dialing delays, and agrees with the *NANC Report* that dialing delays, if feasible, could result in the caller terminating the call, thinking the call failed, or result in unintended calls being routed to the hotline when a seven-digit number is dialed too slowly.¹⁶ Further, as non-N11 three-digit dialing was not a designed capability of traditional switching systems, a dialing delay in terms of the implementation of non-N11 three-digit dialing code may be interpreted, from an engineering perspective, as a technical defect rather than a manageable solution. Therefore, providers cannot necessarily control the duration of the delay, and attempts to manipulate the delay may result in harm to other aspects of the network. ATIS INC strongly believes that service providers are in the best position to decide whether dialing

¹³ *NPRM* at ¶36.

¹⁴ *NPRM* at ¶41.

¹⁵ *NPRM* at ¶42.

¹⁶ *NANC 988 Report*, Section 4.12.3.

delays are feasible. However, it should be understood that different types of switching equipment will have different dialing delay capabilities or none at all.

The Commission seeks comment on whether it should mandate one particular solution to address the technical challenges associated with the use of 988 for the hotline, noting that it has mandated ten-digit dialing in cases of area code relief.¹⁷ It asks, for example, whether it should require states to transition to ten-digit dialing in areas where the 988 exchange has been assigned as an NXX prefix in area codes that still have seven-digit dialing, or leave it to state commissions to decide whether to mandate ten-digit dialing rather than a dialing delay for any given area code.¹⁸ While ATIS INC strongly prefers the Commission mandate ten-digit dialing in the area codes where seven-digit dialing is still allowed and 988 is assigned as an NXX code, it cautions that this proposed solution cannot be implemented simultaneously in all 95¹⁹ affected area codes as service providers simply do not have the necessary personnel to make all necessary network changes and upgrades at one time. Attempting to implement ten-digit dialing in all affected area codes at one time (a “flash-cut”) can also pose risks to network stability--risks that are exacerbated by the numerous equipment, software routing and other network changes that would be required to implement 988 for the national suicide prevention hotline. Thus, as also indicated above, such an undertaking would be best accomplished with a phased approach.

In the *NPRM*, the Commission proposes that all service providers and interconnected VoIP providers be required to implement 988 within 18 months, believing that this timeframe would provide sufficient time for providers to make any necessary changes to equipment and software, and to institute any necessary new dialing requirements. For this reason alone, 18

¹⁷ *NPRM* at ¶44.

¹⁸ *NPRM* at ¶44.

¹⁹ As of February 5, 2020, there are 92 affected area codes in which there is 7-digit dialing and 988 is in use as an NXX code (where 10-digit dialing will need to be implemented).

months is insufficient time. ATIS INC's conclusion is based on the industry's significant experience with implementing ten-digit dialing that is required with area code overlays, having implemented more than 40 overlays in the last decade or so. The implementation of one overlay typically takes 13 months; implementing ten-digit dialing in all affected area codes would take significantly more time (more than 18 months) because providers do not have the resources to do all implementations simultaneously. Moreover, the implementation of ten-digit dialing must proceed carefully and deliberately to avoid any unintended impacts to 911 providers and Public Safety Answering Points (PSAPs), and to ensure customers are adequately educated about the dialing change and have sufficient time to make any necessary changes to their customer-premises equipment (CPE).²⁰ Implementation of ten-digit dialing in areas not facing area code exhaust may generate questions from consumers; broad educational efforts, including engagement from state and federal government, should be utilized to ensure a smooth transition. A longer implementation timeline that recognizes these technical and operational challenges should be considered. ATIS INC believes that it is premature to establish an implementation deadline before key decisions have been made. For example, before a reasonable timeline can be established, it must first be determined whether all 988 calls will be routed to 1-800-273-TALK or to local call centers, and whether ten-digit dialing will be implemented in area codes where 7-digit dialing is allowed and 988 is assigned as an NXX code.

To facilitate the implementation of ten-digit dialing in those area codes where seven-digit dialing is allowed and 988 is assigned as an NXX code, ATIS INC recommends that the

²⁰ For example, customers need to reprogram services or devices currently programmed to use a seven-digit number to include the area code; this may include stored contacts in handsets, life safety systems or medical monitoring devices, fire or burglar alarm and security systems or gates, speed dialers, call forwarding settings, PBXs and fax machines, local internet dial-up numbers, voicemail services, etc. Customers also need to check their websites, stationery, advertising materials, personal and pet identification tags and other such items to ensure the area code is included.

Commission address the implementation questions raised in the *NPRM* so that lengthy and varied state-specific proceedings can be avoided. Service providers are in the best position to provide input on ways to streamline the planning process and specific implementations. ATIS INC believes that this input is critical to ensuring a consistent customer experience, and recommends against leaving it solely to the states to decide.

Finally, the Commission seeks comment on the costs and benefits of transitioning to ten-digit dialing or implementing a post-dial delay in seven-digit dialing areas, where 988 is already assigned as an NXX code.²¹ ATIS INC notes that the implementation of ten-digit dialing in those area codes where 988 is already in use as an NXX code could benefit the industry and the states by potentially streamlining subsequent area code relief in those area codes. Because ten-digit dialing would already be in place, an overlay would be the logical relief method, and could be more easily implemented should or when area code relief is needed.

III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *NPRM* and urges the Commission to consider the recommendations above.

Respectfully submitted,



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²¹ *NPRM* at ¶59.