

**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)

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

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Further Notice of Proposed Rulemaking (FNPRM)*, released April 23, 2021, in the above-referenced docket. In the *FNPRM*, the Federal Communications Commission (Commission) proposes that covered text providers support text messaging to 988. ATIS supports the Commission’s proposal to require that covered text providers route covered 988 text messages to the Lifeline’s current 10-digit number by July 16, 2022. ATIS strongly recommends proceeding with this approach, given that the approach modeled after the text-to-911 architecture (which has greater technical and operational complexity) would require significantly more time to implement.

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 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 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

Input to this *FNPRM* was provided by ATIS IMS Emergency Services IP Network (IMSESINET), a joint project led by ATIS':

- Wireless Technologies and Systems Committee's Systems and Networks Subcommittee, which develops, maintains, amends, and enhances American National Standards and ATIS deliverables related to system aspects, networks, and terminals compliant with the 3GPP family of standards (2G/3G/4G/5G) including circuit-switched services, packet-switched services, IP Multimedia Services (IMS), and future developments.
- Emergency Services Interconnection Forum's Next Generation Emergency Services Subcommittee, which coordinates emergency services needs and issues with and among standards development organizations and other industry forums and develops emergency services standards, and other documentation related to advanced (i.e., Next Generation 911) emergency services architectures, functions, and interfaces for communications networks.
- Packet Technologies and Systems Committee, which develops standards related to services, architectures, signaling, network interfaces, next generation carrier interconnect, cybersecurity, lawful intercept, and government emergency telecommunications service within next generation networks.

II. COMMENTS

A. **Requiring Covered Text Providers to Route Covered 988 Text Messages to the Lifeline 10-Digit Number**

In the *FNPRM*, the Commission proposes to require covered text providers to support text messaging to 988, the 3-digit dialing code to reach the National Suicide Prevention Lifeline (NSPL, or simply Lifeline) by telephone.¹ The Commission proposes to require that covered text

¹ *FNPRM* at ¶2.

providers route covered 988 text messages to the Lifeline’s current 10-digit number, 1-800-273-8255 (TALK).² The Commission further proposes to allow covered text providers to use any reliable method or methods (e.g., mobile-switched, IP-based) to support text routing and transmission to 988, similar to text-to-911 implementation.³ ATIS supports this proposal and believes that it can and should be implemented in a timely manner. ATIS has reviewed the proposed routing of 988 messages to the Lifeline 10-digit number and has not identified any technical challenges associated with this proposal.

The Commission also asks whether new industry standards are necessary to ensure interoperability.⁴ ATIS believes that, while there may be a need for changes to existing standards, these changes would be minimal if, as expected, no changes are required to consumer devices to support text-to-988 requirements. A focus on functionality rather than technical standards is required to meet the needs of those who communicate primarily via texting.

Input on the proposed timeline for implementation of the new text-to-988 requirements is also sought in the *FNPRM*.⁵ ATIS believes that the previously proposed deadline of July 16, 2022, is reasonable.⁶ Given that it is already possible to text the existing Lifeline toll-free number and that the Commission proposes to allow text providers to use any reliable method or methods to support text routing and delivery to 988, texting to the new three-digit short code (988) would create no new technical challenges. An expanded scope of features along with

² *FNPRM* at ¶30.

³ *FNPRM* at ¶42.

⁴ *FNPRM* at ¶47.

⁵ *FNPRM* at ¶36.

⁶ The Commission notes that CTIA had previously indicated that July 16, 2022, or 6 months after Lifeline is prepared to receive texts, whichever comes later, would be an appropriate timeline.

different forms of texting would substantially diminish the chances of meeting a July 2022 deadline.

The Commission asks about creating a separate timeline for the implementation of voice-to-988.⁷ ATIS believes that a phased approach is unnecessary if the Commission adopts its proposal to require providers to route covered 988 text messages only to the Lifeline's 10-digit number.

The Commission also seeks comment on whether it should require covered text providers to enable text-to-988 messages to include location information.⁸ ATIS agrees with the Commission that it should not adopt such a requirement. ATIS also notes that routing on location would not apply to calls to 988 under the preferred implementation of routing to the Lifeline toll-free number.

B. Alternative Text-to-911 Model

The Commission seeks comment in the *FNPRM* on an alternative routing model similar to the text-to-911 architecture, by requiring routing directly to a Lifeline local crisis center or to a Veterans Crisis Line.⁹ ATIS notes that there are a number of technical and operational concerns with this alternative that would need to be addressed before specification updates and implementation could occur, which would delay implementation well beyond the July 2022 deadline proposed by the Commission. This proposal would be significantly more complicated than routing to the Lifeline's toll-free number. Moreover, further study is required to determine whether the text-to-911 architecture could be leveraged to support this approach, including any

⁷ *FNPRM* at ¶40.

⁸ *FNPRM* at ¶35.

⁹ *FNPRM* at ¶33. It should be noted that routing of messages in text-to-911 does not generally go directly to a PSAP, but rather is routed through the Emergency Services network.

requirements for crisis centers to support the capability to receive text messages on a compatible interface. This approach would also require the development of new and/or revised industry standards to address the application of this architecture to text-to-988.

If the Commission nonetheless were to require modeling of text-to-988 after text-to-911, ATIS notes that several aspects of the text-to-911 model would need to be considered in order to determine their applicability to text-to-988. If text-to-988 is closely modelled after text-to-911, the process of updating the specifications is expected to take approximately 9-12 months from the effective date of any new policy rules necessary to determine the target implementation, including, but not limited to, any rules related to providing the location of the caller to a crisis center, location-based routing to facilitate access to local crisis centers, and bounce-back messages when crisis centers do not support text-to-988. The implementation timeline is expected to be 12-18 months after the development of stable standards depending on the extent to which providers may be able to leverage parts of the text-to-911 system. For example, it is assumed that such an approach would:

- Require all 988 text requests to go to a Text Control Center (TCC)-like gateway;
- Permit coarse location (cell/sector based) routing;
- Be capable of supporting the conveyance of more precise position information (if available and allowed by policy) if Lifeline crisis center can support the conveyance and/or utilization of such location information;
- Not provide support for text-to-988 from international inbound roamers or from non-initialized devices;
- Require the local crisis call centers to have IP-based capabilities; and
- Require bounce-back messages in situations in which the NSPL or any text-capable local crisis call centers in the NSPL network cannot support text messages (i.e., permanent or temporary unavailability).

Given these technical and operational challenges for both the Commercial Mobile Service Providers and the Lifeline, and the significant increase in time to field that these challenges would represent, ATIS strongly supports proceeding with the Commission's preferred

approach to require the routing of text-to-988 only to the Lifeline toll-free number. ATIS believes that this approach would achieve the Commission's near-term goals of providing individuals with disabilities and others, especially at-risk youth whose primary or preferred method of communications is texting, to receive the help, support, and resources that they need.

C. Routing to Lifeline or Veterans Crisis Line

In the *FNPRM*, the Commission seeks comment on possible solutions to ensure that texts are routed to the proper counseling services via the Lifeline or the Veterans Crisis Line, including input on technical feasibility, ways to minimize consumer confusion, and implementation costs.¹⁰ ATIS notes that use of a single short code (988) makes it infeasible to automatically route calls to one service or the other. Providers would have no way to know which service callers would need without additional information (such as a secondary input exchange).

D. Supporting Next Generation Communication Forms

The Commission also requests input regarding whether next-generation forms of text messaging, such as Multimedia Message Service (MMS), Rich Communications Services (RCS), and/or Real-Time Text (RTT), should be included in the proposed text-to-988 requirements.¹¹ ATIS notes that there are technical and operational factors that should be considered when evaluating these technologies.

MMS. ATIS assumes that if the implementation path of following the model of text-to-911 is pursued that any MMS text-to-988 support would include only the same limited MMS functionality (i.e., text-only delivery) currently standardized for text-to-911.

RCS. ATIS believes that additional study is required to determine the applicability of RCS to text-to-988 before the Commission could require support for RCS-to-988.

¹⁰ *FNPRM* at ¶34.

¹¹ *FNPRM* at ¶23.

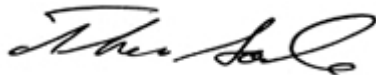
RTT. RTT is dependent on the establishment of a voice call. Therefore, ATIS believes that RTT does not fall within the scope of SMS/MMS text messaging and should not be considered in the context of text-to-988, but rather should be considered as an additive service to a voice call. Furthermore, RTT requires end-to-end IP media transport along with SIP signaling, as well as text input and output capabilities of the RTT endpoint at the crisis center.

ATIS believes that the Commission's "preferred" approach would address the needs of individuals who require or prefer texting as their mode of communication. Application of alternative text mechanisms for communication with the NSPL can be evaluated as they are further developed.

III. CONCLUSION

ATIS supports the Commission's proposal to require that covered text providers route covered 988 text messages to the Lifeline's current 10-digit number. ATIS appreciates the opportunity to provide input to the *FNPRM* on texting to 988 and urges the Commission to consider the recommendations above.

Respectfully submitted,



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