

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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

REPLY COMMENTS OF CTIA

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TABLE OF CONTENTS

I. INTRODUCTION AND SUMMARY.....1

II. THE RECORD SHOWS THAT THE COMMISSION SHOULD SUPPORT THE
GEOROUTING SOLUTIONS CURRENTLY BEING DEPLOYED.3

III. THE COMMISSION SHOULD NOT CONSIDER PROPOSALS TO MODIFY THE
CENTRALIZED ROUTING OF CALLS TO THE 988 LIFELINE.8

IV. THE RECORD DOES NOT SUPPPORT CONSIDERATION OF GEOROUTING
OBLIGATIONS FOR TEXT-TO-988 AT THIS TIME.10

V. CONCLUSION.12

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CTIA respectfully submits these reply comments in response to the Federal Communications Commission’s (“Commission” or “FCC”) Second Further Notice of Proposed Rulemaking (“FNPRM”) in the above-referenced proceeding regarding the adoption of solutions to provide georouting information to the 988 Suicide & Crisis Lifeline (“988 Lifeline”).¹

I. INTRODUCTION AND SUMMARY.

CTIA and its member companies appreciate the Commission’s leadership in the effort to improve the routing of wireless calls to the 988 Lifeline. The record developed in this proceeding demonstrates that all stakeholders, including mental health and suicide prevention organizations, wireless providers, the 988 Lifeline’s Administrator Vibrant Emotional Health (“Vibrant” or “Lifeline Administrator”) and other vendors to the Substance Abuse and Mental Health Services Administration (“SAMHSA”), share the Commission’s goal of ensuring that the 988 Lifeline and its affiliated network of local crisis centers can respond to people in crisis as effectively as possible, and agree that georouting data for wireless calls will improve the 988 Lifeline’s ability to do so.

The record also confirms that the nationwide wireless providers, AT&T, T-Mobile, and Verizon, are working with the Lifeline Administrator to implement georouting solutions to enable the 988 Lifeline to route wireless voice calls to a local crisis center that is geographically

¹ *Implementation of the National Suicide Hotline Act*, Second Further Notice of Proposed Rulemaking, FCC 24-45 (rel. Apr. 26, 2024) (“FNPRM”).

appropriate to the caller.² These georouting solutions align with the 988 Lifeline and wireless providers' end-to-end IP-based network configurations and capabilities and protect 988 callers' privacy. The nationwide wireless providers are working to implement these solutions as expeditiously as possible.

Because the 988 Lifeline will soon be able to route the vast majority of wireless 988 calls to a local crisis center geographically appropriate to callers' locations, there is no reason for the Commission to adopt rules in this area. To the extent that the Commission considers rules, however, the record confirms that such rules should be aligned with, and in any event should not undermine, the georouting solutions currently being implemented. Commenters agree that a general obligation to provide georouting data to the 988 Lifeline with end-to-end IP-based wireless 988 calls would be consistent with the current implementation of georouting solutions and provide flexibility to evolve georouting capabilities to meet the needs of the 988 Lifeline system.

In addition, the Commission should decline some parties' suggestions to modify the centralized routing of 988 calls under the administration of SAMHSA and the Veterans Administration ("VA"). These approaches are inconsistent with the 988 georouting solutions being implemented today; would undermine the benefits, long recognized by the Commission, of a centralized 988 routing system overseen by SAMHSA and the VA; and would be inconsistent with Congress's intent in section 251(e)(4) of the Communications Act. The record also demonstrates that the Commission should defer consideration of georouting for text-to-988, given the lack of a

² SAMHSA has noted its collaboration with wireless providers this year. *See, e.g.*, SAMHSA, 988 Frequently Asked Questions, FAQs About Privacy, Call Routing, and Network Functioning, What work is being done on georouting? <https://www.samhsa.gov/find-help/988/faqs#about-call-routing-privacy-network-functioning>.

feasible georouting solutions for text messages and the reliance of local crisis centers on the national crisis centers to respond to text messages in their states or localities.

II. THE RECORD SHOWS THAT THE COMMISSION SHOULD SUPPORT THE GEOROUTING SOLUTIONS CURRENTLY BEING DEPLOYED.

Commenters unanimously affirm that, by enabling the 988 Lifeline to route calls more consistently to geographically appropriate call centers while protecting callers' privacy, georouting information will allow the 988 Lifeline to serve people in crisis more effectively. The record also confirms that the nationwide wireless providers and the Lifeline Administrator will expeditiously implement solutions to provide such georouting information with the vast majority of wireless 988 calls. As such, there is no need for the Commission to adopt georouting requirements, but if it does so, commenters emphasize that any such rules should be aligned with, and in any event should not undermine, the georouting solutions currently being implemented.

Commenters across all sectors recognize the benefits of georouting information to enable the 988 Lifeline to meet callers' needs more effectively while protecting callers' privacy. For example, as the National Alliance on Mental Illness ("NAMI") notes, "routing calls based on generalized location, while also protecting confidentiality and personal information ... will help ensure that callers in crisis are connected to the critical lifesaving services nearest to their location," enabling a locally appropriate response.³ T-Mobile similarly recognizes the value of "ensuring that the Lifeline has the information it needs to route calls from a person in distress to the geographically relevant crisis center best positioned to help."⁴ Mental Health America emphasizes that "[e]nsuring that a caller is linked with support based on their physical location can enable crisis

³ NAMI Comments at 1-2. Unless otherwise specifically noted, references to a party's "Comments" refer to that party's initial comments on the FNPRM filed in this docket on or about June 28, 2024.

⁴ T-Mobile Comments at 1.

contact centers to provide connections to local resources and follow-up services, reducing the risk of suicidality for individuals in crisis.”⁵ As The Trevor Project notes “[i]f a georouting system is well-designed and protects the privacy of callers, it could play an important role in increasing the effectiveness” of the 988 Lifeline.⁶ And Pew discusses how georouting information will “allow call takers to quickly provide connections to local service providers who have a better understanding of local resources, geographical barriers, and cultural considerations, while avoiding any unnecessary delays in emergency response times.”⁷

The record also confirms that, as CTIA discussed in its comments, the nationwide wireless providers are actively working with the Lifeline Administrator to expeditiously implement georouting solutions for end-to-end IP-based wireless 988 calls that are compatible with the 988 Lifeline and wireless providers’ existing network configurations and capabilities.⁸ As the Lifeline Administrator describes, the “georouting solution developed in conjunction with Vibrant’s partners for the 988 Lifeline telephony infrastructure and major wireless carriers represents the preferred solution that would allow real-time routing updates without the creation of an entirely new 988 Lifeline framework and architecture.”⁹ T-Mobile states that its implementation of the georouting solution is currently expected to be operational in August 2024.¹⁰ The nationwide providers’ prompt implementation will enable the provision of georouting information for more than 98% of

⁵ Mental Health America Comments at 2; *see also* Reimage Crisis Response Comments at 2 (stating “[i]mplementing georouting will help fulfill the vision of 988 to reduce the risk of suicidality, future crises, and unnecessary use of emergency services and law enforcement.”).

⁶ The Trevor Project Comments at 2.

⁷ The Pew Charitable Trusts (“Pew”) Comments at 1.

⁸ CTIA Comments at 1-2.

⁹ Vibrant Comments at 4-5; *see also* CX360 Comments at 3-4 (stating it “has developed a cost-effective . . . georouting solution for wireless calls to the 988 Lifeline.”)

¹⁰ T-Mobile Comments at 1, 34-6.

all wireless subscribers in the United States.¹¹ As CTIA discussed in its comments, the georouting solutions developed by the nationwide wireless providers, in conjunction with the 988 Lifeline, can serve as models for non-nationwide wireless providers.¹²

The record thus shows that, as a result of the “cooperation between the wireless carriers originating calls and the Lifeline Administrator that controls the call routing platform that receives them,” the Commission’s goal of “improv[ing] the routing of wireless calls to 988 so callers are connected to crisis centers based on the caller’s location ... irrespective of the area code associated with the wireless phone” soon will have been achieved.¹³ This is, as the Commission has noted, “an important step toward improving access to the critical, life-saving services” provided by the 988 Lifeline.¹⁴

Given the ongoing implementation of 988 georouting solutions by wireless providers, there is no need for the Commission to adopt georouting rules in this proceeding. In fact, as T-Mobile notes, attempting to formulate rules in this complex area “may unintentionally complicate the rollout process and result in delays.”¹⁵ Further, no party offers a reason why rules are needed to ensure that 988 georouting solutions are implemented. Rather, commenters supporting the adoption of rules focus on the benefits of georouting information to improve the 988 Lifeline’s ability to route 988 calls.¹⁶ As discussed above, however, all parties agree on those benefits and

¹¹ See *Communications Marketplace Report*, 2022 Communications Marketplace Report, 37 FCC Rcd 15514, 15571 ¶ 75, Fig. II.B.3 (2022).

¹² CTIA Comments at 7.

¹³ FNPRM ¶¶ 2, 4.

¹⁴ *Id.* ¶ 1.

¹⁵ T-Mobile Comments at 2.

¹⁶ NAMI Comments at 1-2; Reimage Crisis Response Comments at 1; Washington Health Dept. Comments at 1; American Foundation for Suicide Prevention Comments (“AFSP”) at 2; Vibrant Comments at 5.

wireless providers already are implementing georouting solutions without any need for Commission rules.

To the extent that the Commission nevertheless considers adopting rules, commenters make clear that the Commission should carefully avoid undermining the ongoing implementation of the georouting solutions that have been developed by the nationwide wireless providers and the Lifeline Administrator. For example, the Lifeline Administrator calls the current georouting solution “the preferred solution” because it would be “cost-effective” and “able to be deployed faster than other proposed solutions.”¹⁷ Similarly, CX360, a key vendor to the 988 Lifeline, states that, “[i]n the event that the Commission adopts regulations requiring wireless carriers to implement a georouting solution for wireless calls to the 988 Lifeline,” it should “ensur[e] any such regulations are both general in nature and compatible with the systems and methodologies already adopted by the Lifeline Administrator.”¹⁸ Moreover, leading mental health organizations make clear that the 988 georouting solutions being implemented strike the appropriate balance between leveraging advanced location information capabilities while protecting 988 callers’ privacy.¹⁹

Further, any rules adopted in this proceeding should recognize that the current georouting deployments are premised on the IP-based capabilities of the 988 Lifeline, its vendors, and wireless networks, which allows their expeditious implementation but also entails certain limited constraints. As discussed in CTIA’s comments, these constraints include calls that are not carried end-to-end on IP networks and calls placed while roaming.²⁰ Despite these constraints, however,

¹⁷ Vibrant Comments at 4-5.

¹⁸ CX360 Comments at 4.

¹⁹ National Council for Mental Wellbeing Comments at 2; NAMI Comments at 2; The Trevor Project Comments at 2; Mental Health America Comments at 3.

²⁰ CTIA Comments at 6-7.

these solutions will provide georouting information with the overwhelming majority of wireless 988 calls.

In light of these considerations, if the Commission considers adopting rules regarding 988 georouting information (which, as discussed above, are not needed given the ongoing implementation of georouting solutions), such rules should be structured as a general obligation for wireless providers to provide georouting information to the 988 Lifeline with 988 calls carried end-to-end on IP-based networks and not originated while the caller is roaming, to allow the 988 Lifeline to route 988 calls to state and local crisis centers in the 988 Lifeline network.²¹

The record also affirms the need for the Commission to ensure that non-nationwide providers have sufficient time to implement georouting solutions. For example, the Rural Wireless Association (“RWA”) explains that non-nationwide CMRS providers should be given at least 36 months to comply with any georouting mandate,²² and Incompas advocates for a four-year timeline for providers including non-nationwide wireless providers.²³ Providing additional time for non-nationwide wireless providers’ implementation here is consistent with the Commission’s recent approach in setting compliance timelines for location-based routing for 911 and the transition to Next Generation 911.²⁴

²¹ See CTIA Comments at 5-6.

²² RWA Comments at 1-2.

²³ Incompas Comments at 4.

²⁴ *Location-Based Routing for Wireless 911 Calls*, Report and Order, FCC 24-4, ¶ 42 (rel. Jan. 26, 2024) (“*911 LBR Order*”) (providing a compliance timeline for non-nationwide wireless providers four times longer than for nationwide providers); *Facilitating Implementation of Next Generation 911 Services (NG911)*, Report and Order, FCC 24-78 ¶ 120 (rel. July 19, 2024) (“This longer timeframe accounts for the unique challenges raised by non-nationwide CMRS providers in their comments, while ensuring that the NG911 transition proceeds in a timely manner in order to provide crucial benefits to public safety.”).

III. THE COMMISSION SHOULD NOT CONSIDER PROPOSALS TO MODIFY THE CENTRALIZED ROUTING OF CALLS TO THE 988 LIFELINE.

Some commenters offer proposals to modify the way that 988 calls are routed to local crisis centers, bypassing the 988 Lifeline’s current call routing protocols managed by SAMHSA and the VA. These proposals are incompatible with the 988 georouting solutions being implemented today, inconsistent with the Commission’s recognition of the benefits of a centralized 988 routing system overseen by SAMHSA and the VA, and contrary to section 251(e)(4) of the Communications Act. The Commission should not consider them.

For example, the State of California Governor’s Office of Emergency Services asks the FCC to enable “9-8-8 georouting directly to state developed platforms, as well as to the current 9-8-8 Lifeline system.”²⁵ Comtech argues that states should be permitted to “adopt alternative, direct, IP-based call routing paths.”²⁶ The National Association of Counties asks the FCC to allow states and counties to determine the geographic boundaries for routing 988 calls,²⁷ and Intrado suggests merging the routing of 988 calls with Next Generation 911 call routing.²⁸

Modifications to the centralized routing of 988 calls suggested by these commenters would halt the implementation of the current georouting solutions. As the Lifeline Administrator emphasizes, the current georouting solutions leverage the 988 Lifeline’s “existing routing structure and allow for a georouting solution much faster than other proposed concepts.”²⁹ Similarly, CX360

²⁵ The State of California Governor’s Office of Emergency Services (“Cal OES”) Comments at 3.

²⁶ Comtech Telecommunications Corp. (“Comtech”) Comments at 7.

²⁷ The National Association of Counties Comments at 2. *See also* Comtech at 5-7 (asking the Commission to require wireless providers to implement direct to state, dedicated, IP-based georouting solutions for the 988 Lifeline using truncated cell tower latitude and longitude).

²⁸ Intrado Comments at 7-8. *See also* NENA Comments at 2-3 (asking the Commission to treat 988 calls as “emergency calls” and use Next Generation 911 Core Services as a single interface for 911 and 988).

²⁹ Vibrant Comments at 3.

urges that “any georouting solution build on the Lifeline Administrator’s existing infrastructure rather than try to replace it.”³⁰ The current georouting implementations work with the existing structure, while these alternate proposals would require significant modifications to it.

Altering the centralized routing of 988 calls also would undermine SAMHSA’s and the VA’s administration of the 988 Lifeline. The Commission consistently has recognized the benefits of centralized routing of 988 calls within the structure of the 988 Lifeline administered by SAMHSA and the VA.³¹ The record bears out the merits of this approach. For example, the Trevor Project observes that geographic proximity is not the only factor involved in connecting 988 callers with the most appropriate services, and centralized routing allows the 988 Lifeline to route calls to its subnetworks to ensure that callers connect with a call center that can best address their particular needs—which is critical for many callers, including LGBTQ+ youth.³² In response to similar requests in the past, the Commission has demurred and urged parties to work within the structure of the 988 Lifeline.³³ It should do the same here.

These proposals also would be inconsistent with Congress’s direction in section 251(e)(4), which requires that 988 be used “as the universal telephone number within the United States for the purpose of the national suicide prevention and mental health crisis hotline system *operating through the National Suicide Prevention Lifeline* maintained by [SAMHSA] and through the

³⁰ CX360 Comments at 3.

³¹ *Implementation of the National Suicide Hotline Improvement Act of 2018*, Report and Order, 35 FCC Rcd 7373, 7395-98 ¶¶ 41-45 (2020) (“988 Order”).

³² The Trevor Project Comments at 3.

³³ *See, e.g., 988 Order*, 35 FCC Rcd at 7397-98 ¶ 45 (rejecting Puerto Rico’s request to require the routing of 988 calls in Puerto Rico to the local crisis center and “encourag[ing] stakeholders in Puerto Rico to work with SAMHSA to bring a local crisis center in Puerto Rico into the Lifeline network”).

Veterans Crisis Line maintained by the [VA].”³⁴ Proponents of routing 988 calls at the direction of other entities have not explained how their proposals are permissible under the statute.

IV. THE RECORD DOES NOT SUPPORT CONSIDERATION OF GEOROUTING OBLIGATIONS FOR TEXT-TO-988 AT THIS TIME.

CTIA and its member companies are proud of the role that text-to-988 has played in helping millions of people in crisis reach the Lifeline since its launch two years ago.³⁵ However, the record shows that the Commission should not consider requirements for text-to-988 at this time.

First, the initial comments demonstrate that, while solutions have been developed to provide georouting information with IP-based wireless voice calls to 988, there are significant technical differences between voice networks and Short Message Service (“SMS”) text messaging networks (the texting format supported by the 988 Lifeline for text-to-988).³⁶ The record does not identify any feasible technical solutions that currently exist to provide georouting information with SMS text messages. As CX360 accurately describes, “[t]here are significant differences between voice and SMS technologies and help seekers will be best served by allowing 988 stakeholders to

³⁴ 47 U.S.C. § 251(e)(4) (emphasis added).

³⁵ See, e.g., Crisis Leadership at Burrell Behavioral Health (“Crisis Leadership”) Comments at 1-2; Trevor Project Comments at 1-2; AFSP Comments at 1-3; UPMC Western Behavioral Health (“UPMC”) Comments at 3; Volunteers of America Western Washington Comments at 2; Vibrant 2-3; Reimage Crisis Response Comments at 1.

³⁶ *Implementation of the National Suicide Hotline Improvement Act of 2018*, Second Report and Order, 36 FCC Rcd 16901, 16914-18 ¶¶ 22-28 (2021) (defining “covered 988 text message” as a 988 text message in SMS format and declining to require covered text providers to support other text message formats, such as MMS, rich communications service (RCS), and real-time text (RTT), because the Lifeline cannot currently receive texts in these formats). See also *Wireline Competition Bureau Confirms No New Texting Formats for Text-to-988*, Public Notice, DA 24-536 (WCB rel. June 7, 2024) (“no new texting formats have been implemented or requested at this time”).

continue collaborating” towards georouting solutions.³⁷ Crisis Text Line observes that the “length of time required to develop a georouting solution for text messages is also unknown.”³⁸

Second, the record shows that providing georouting information with texts to 988 would be of limited value at this time because many local crisis centers rely upon national crisis centers and the 988 Lifeline network to respond to text messages in their states and localities. Crisis Text Line, which partners with the Lifeline Administrator and SAMHSA as a backup provider for text and chat communications to 988, observes that one of the “most notable challenges” for implementing georouting solutions for texts to 988 “is the lack of local infrastructure to support georouting for texts.”³⁹ Crisis Text Line reports that “[m]ost states and localities are not currently equipped” to receive text messages and “there are some states where no local traffic for 988 texts is able to be handled locally, and where 100% of traffic for those states’ 988 texts is routed to the national backup network providers.”⁴⁰

Deferring consideration of georouting requirements for text-to-988 would be consistent with the Commission’s decision, earlier this year, not to impose location-based routing obligations on SMS text messages to 911. In that decision, the Commission recognized that “industry has not yet developed standards for implementing location-based routing on SMS networks” and “some PSAPs remain incapable of receiving texts.”⁴¹ The circumstances here are comparable, and the Commission should take the same approach with respect to text-to-988.

³⁷ CX360 Comments at 15. *See also, e.g.*, Intrado Comments at 7 n.9 (suggesting that a georouting solution for text-to-988 may be available so long as the Lifeline Administrator “can receive 988 text calls in the same format as used by 911 systems”).

³⁸ Crisis Text Line Comments at 3.

³⁹ *Id.* at 2.

⁴⁰ *Id.*

⁴¹ 911 LBR Order ¶¶ 60-61.

V. CONCLUSION.

Under the Commission’s leadership, and through the efforts of the wireless industry, the Lifeline Administrator, and other stakeholders, the Commission’s goal of “improv[ing] the routing of wireless calls to 988 so callers are connected to crisis centers based on the caller’s location ... irrespective of the area code associated with the wireless phone” is about to be achieved.⁴² No rules are needed to ensure the implementation of georouting solutions, which likely will have occurred before any rules in this docket could become effective. At this stage, the Commission’s primary focus should be to ensure that nothing impedes the realization of this achievement. CTIA and its members look forward to continued collaboration with the Commission, SAMHSA, the VA, and the mental health community to support the 988 Lifeline’s vital work to help those in suicidal and mental health crises throughout the United States.

Respectfully submitted,

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⁴² FNPRM ¶ 2.