



June 28, 2024

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

RE: WC Docket No. 18-336, *Implementation of the National Suicide Hotline Act of 2018*, Second Further Notice of Proposed Rule Making

Dear Chairwoman Rosenworcel,

Over the last two years, the 988 Suicide and Crisis Lifeline has connected millions of people struggling with mental health, substance use and suicidal crises with support. We thank you and the Federal Communications Commission (FCC) commissioners for your continued leadership and support of the implementation of 988. The undersigned organizations represent a growing group of multi-sector national leaders committed to reimagining our response to people experiencing a mental health, suicide, or substance use crisis. We represent people with mental health conditions and substance use disorders and their families, individuals affected by suicide, health care and emergency response professionals, advocates for civil and disability rights, law enforcement, and others. ***Together, we write in support of the FCC's proposed rule to implement georouting for calls to 988.*** We believe that routing calls, without personally identifiable information, to the nearest 988 call center will help us get closer to reaching the full potential of the 988 Lifeline.

Requiring wireless carriers to use a georouting solution for the 988 Lifeline, while protecting confidentiality and personal information, is essential to ensuring that callers have access to critical services and support in their community. Since the implementation of 988, we have seen a significant growth in the need for this critical service, with a projected [7.5 million contacts](#) expected in 2025 alone. By routing calls to the nearest call center, based on the caller's general geographic location, local crisis centers are better able to serve people in need, creating direct connections with community mental health care, resources and support while also protecting confidentiality.

Many states and communities have made significant investments to create mobile crisis response teams and crisis receiving and stabilization options as part of the full continuum of crisis care – providing critical services for people who need more help than what can be provided over the phone. Right now, several states have opted not to promote 988, instead relying on a state-specific 10-digit number, so that they can ensure people in their state have access to the full range of services. Sadly, this is contrary to the intent of a nationalized, three-digit number. Georouting can help address this situation, build trust in and promote the 988 Lifeline, and ensure that callers can receive the full benefit of their communities investment in crisis resources.

Implementing 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, and it will take all of us to fulfill this vision. We strongly believe that the benefits outweigh any projected costs to industry stakeholders. Connecting more people to timely and local crisis support and services through accurately routed 988 calls will save lives.

In addition to swiftly implementing georouting for calls, we urge the FCC to work with SAMHSA and industry stakeholders for a georouting solution for text messages. Text messaging to 988 increased more than 1000% in the first year after implementation. We appreciate that this will take different technological solutions, but that process must start immediately.

Our organizations are grateful for the ongoing leadership and efforts of the FCC in support of 988 and crisis response. We believe that the FCC has the legal authority to require the industry to implement georouting solutions for the 988 Lifeline. In addition to legal authority, we also believe that there is a significant benefit to the public interest. The need for and benefit to someone being able to easily connect to their local crisis system of care through 988 cannot be overstated. As we have stated before, a change to georouting will save lives.

We look forward to the Commission quickly implementing final rules that allow for the immediate implementation of 988 georouting. If you have any further questions regarding our position, please don't hesitate to contact Jennifer Snow ([jsnow@nami.org](mailto:jsnow@nami.org)).

Sincerely,

American Academy of Pediatrics  
American College of Emergency Physicians  
American Counseling Association  
American Foundation for Suicide Prevention  
American Psychiatric Association  
Behavioral Health Foundation  
CIT International  
Connections Health Solutions  
Crisis Residential Association  
Depression and Bipolar Support Alliance (DBSA)  
Fountain House  
Inseparable  
Meadows Mental Health Policy Institute  
Mental Health America  
National Alliance on Mental Illness (NAMI)  
National Asian American Pacific Islander Mental Health Association  
National Association of Counties  
National Association of Social Workers  
National Association of State Mental Health Program Directors  
National Council for Mental Wellbeing  
Police, Treatment and Community Collaborative (PTACC)  
Recovery Innovations (RI International)

Solari, Inc.

The Arc of the United States

The National Association for Rural Mental Health (NARMH)

The National Association of County Behavioral Health and Developmental Disability Directors (NACBHDD)

The Steve Fund

The Trevor Project

Treatment Advocacy Center

True Colors United