



December 20, 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*, Third 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 building a system that responds to people experiencing 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. We thank you for the Commission's recent adaptation of rules to codify requirements for georouting calls to 988. We believe that everyone, regardless of how they connect to 988, should get connected to support from a local crisis center. **Therefore, we now write in support of your proposal to require georouting for text messaging to 988.**

Texting is an essential mode of communication for the 988 Lifeline, as demonstrated by the fact that in the first year of implementation, texts to 988 increased more than 1000% and continue to increase year-over-year. Text is the preferred means of communication for many demographic groups, including youth and young adults – a group who continues to report persistent feelings of sadness and hopelessness. This underscores the need to georoute texts, so that help

seekers can be connected to local help and resources regardless of whether they call or text 988. Such a change will help ensure that we continue to create access and connection for those in crisis.

Implementing georouting for text is the next step in the Commission's efforts to fulfill the vision of 988 to provide hope and help to every person in a mental health crisis. Our organizations strongly believe that the benefits outweigh any projected costs to industry stakeholders, and we believe the ongoing partnership between the FCC and SAMHSA can address any implementation concerns for 988 call centers.

Our organizations are grateful for the ongoing leadership and efforts of the FCC in support of 988 and crisis response. The need for and benefits of 988 connecting people to local crisis care cannot be overstated. Requiring both calls and texts to be georouted to 988 will save lives. We believe that the FCC has the legal authority to require the industry to implement georouting solutions for texts to the 988 Lifeline, and we also believe that there is a significant benefit to the public interest, especially to the young people in our communities who communicate substantially via texting.

We look forward to the Commission quickly implementing final rules that will allow for the expeditious implementation of georouting for texts to 988. 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,

National Alliance on Mental Illness  
American Academy of Child and Adolescent Psychiatry (AACAP)  
American Academy of Pediatrics  
American Association of Child and Adolescent Psychiatry  
American College of Emergency Physicians  
American Counseling Association  
American Foundation for Suicide Prevention  
Behavioral Health Foundation  
Behavioral Health Link  
Centerstone  
CIT International  
Connections Health Solutions  
Crisis Text Line  
Depression and Bipolar Support Alliance  
First Focus on Children  
Fountain House  
Inseparable  
Legal Action Center  
Mental Health America  
National Asian American Pacific Islander Mental Health Association (NAAPIMHA)  
National Association for Rural Mental Health (NARMH)  
National Association of Counties

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

National Association of State Mental Health Program Directors

National Council for Mental Wellbeing

Police, Treatment, and Community Collaborative (PTACC)

Recovery Innovations, Inc.

Solari, Inc.

Steinberg Institute

Youth Villages