



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 Rulemaking

Dear Chairwoman Rosenworcel,

Since President Trump signed the 988 Suicide & Crisis Lifeline into law in 2020 and its nationwide implementation in 2022, more than 14 million help seekers have been connected to trained crisis counselors who provide mental health intervention services by phone, chat, and text. The National Alliance on Mental Illness (NAMI) thanks you and all of the Federal Communications Commission (FCC/Commission) commissioners for your support of the ongoing implementation of the lifesaving 988 Lifeline to ensure people in mental health, substance use, and suicidal crises can be connected to the urgent support they need. We urge you to continue these efforts by advancing georouting for text to 988.

NAMI is the nation's largest mental health organization representing people with mental health conditions and their families. Our Alliance of over 650 organizations located across the country are united by our vision for a world where all people affected by mental illness live healthy, fulfilling lives supported by a community that cares.

We thank the Commission for its recent requirements that telecommunication providers georoute calls to 988. We believe that everyone, regardless of how they connect to 988, should get connected to support from a local crisis center that can direct them to services in their community. Therefore, we now write in support of your proposal to require georouting for text messaging to 988. We offer the following comments in response to the proposed rule.

Requiring Georouting Text to 988

We strongly agree with the Commission's proposal to require covered text providers to georoute texts sent to the 988 Lifeline. Such a requirement would direct text messages to the nearest local crisis center to the person seeking help, ensuring that we continue to create access and connection for people in crisis. NAMI's polling conducted in June 2024 with Ipsos found that 52% of individuals are more likely to contact 988 in a crisis if they are connected to a crisis counselor in their state/local area¹, highlighting the importance of georouting for all modalities to build trust and use of this system.

¹ "NAMI & Ipsos 988 Lifeline & Crisis Response Research." National Alliance on Mental Illness (July 2024). <https://www.nami.org/wp-content/uploads/2024/07/NAMI-Ipsos-Summer-2024-Tracking-Poll-Topline.pdf>.

Texting is an essential mode of communication in general, and specifically for the 988 Lifeline. Providing equitable access whether someone is calling or texting 988 is critical as texting use continues to increase. This is 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.

Texting is also the preferred means of communication for many demographic groups who are at an increased risk of crisis, including youth and young adults. According to the Center for Disease Control's (CDC) Youth Risk Behavioral Survey, a startling 40% of high school students report persistent feelings of sadness and hopelessness in the last year, and two in ten students seriously considered suicide². This underscores the importance of meeting young people where they are and enabling the best response when they reach out to 988. Additionally, requiring routing of texts based on location will mean that young help seekers can be connected to local support and resources regardless of whether they call or text 988. This supports the vision of the 988 Lifeline to connect people in crisis to local resources that help them get well and stay well.

Georouting text messages to 988 would also support access for people who have hearing and speech disabilities. Creating parity between calls and texts to the 988 Lifeline would ensure that people with hearing and speech disabilities have a similar experience to help seekers who call 988 for assistance, connecting them to local services in their community.

Furthermore, we support the Commission's proposal for telecommunications providers to support georouting for Short Messaging Services (SMS) text messages to 988. Given that this is currently the format in which the Lifeline Administrator accepts text messages and providers are currently required to send covered texts, we would encourage consistency. This will enhance the 988 Lifeline's ability to connect all help seekers to local crisis care and create parity between texts and voice calls to 988. In instances where the 988 Lifeline begins to accept alternative formats for text messages, NAMI encourages the FCC and telecommunications providers to work with the 988 Lifeline and the Lifeline Administrator to route other text formats to the nearest call center, similar to SMS.

Providing Georouting Data

We agree with the Commission that determining the type of information required to route text messages to the nearest crisis call center is something that should be led by SAMHSA, the agency that oversees the 988 Lifeline, along with the Lifeline Administrator. Similar to our comments in response to the Commission's Second Further Notice of Proposed Rule Making³ regarding georouting of calls, we encourage that these determinations be done in a transparent way to ensure that people understand that their privacy will be protected when they reach out to 988. NAMI's June 2024 poll data shows that nearly two-thirds (63%) of American adults are more likely to contact 988 if they believe they will remain anonymous. Establishing trust in the 988 Lifeline is essential to

² Youth Risk Behavior Survey Data Summary & Trends Report: 2013–2023, Center for Disease Control (August 2024) <https://www.cdc.gov/yrebs/dstr/index.html>

³ NAMI comments in response to WC Docket No. 18-336, *Implementation of the National Suicide Hotline Act of 2018, Second Further Notice of Proposed Rulemaking* (June 28, 2024).

ensuring that people in crisis are not discouraged from using the service when they need it most. Protecting personal information and specific location information of help seekers is of paramount importance for our NAMI Alliance. One of the unique and valued features of 988 is the option to remain anonymous, if desired. NAMI encourages transparency about what location information is captured and how location information is being used, so we can continue to build trust in the 988 Lifeline and encourage help-seeking behaviors among people most at risk for crisis.

Cost Benefit

The nation is facing an unprecedented mental health crisis, and the need for mental health services and support, including crisis care, is essential. Approximately one person dies by suicide every 11 minutes, and suicide remains a leading cause of death in the United States.⁴ Estimates show that anywhere between 21% and 38% of calls to 911 are related to mental health or substance use concerns.⁵ Furthermore, demand is expected to increase as awareness of 988 increases across the country.⁶ The need for this lifesaving resource cannot be denied, and ensuring people are connected to local supports and services will save lives. NAMI strongly believes that the benefit of lives saved far outweighs any potential costs of the georouting for text messages.

Georouting for Specialized Services

NAMI has supported the development and implementation of specialized services for the 988 Lifeline to reach at risk populations. Being able to connect to someone who speaks your language or understands your life experience is beneficial, especially when experiencing a mental health crisis. Currently, individuals can text “pride” to 988 to be directly connected to an LGBTQI+ trained counselor or “ayuda” to connect with a Spanish-speaking counselor. Veterans and service members who text 988 are redirected to text 838255 to reach the Veterans Crisis Line.

The FCC seeks comment on whether georouting solutions are needed when a text-to-988 user selects a specialized service. Unfortunately, specialized services are not currently available through every call center within the 988 Lifeline network, and Veterans Crisis Line calls and texts are answered by the Department of Veterans’ Affairs – not 988 call centers. This creates challenges for providing specialized services, while also connecting people to local crisis services. Given the capacity of the 988 Lifeline network at this time, we would encourage FCC to prioritize connecting people who seek out specialized services to those services rather than prioritizing routing to local call centers. NAMI believes the benefit of receiving a needed specialized response is of higher importance than the need for georouting text messaging.

Timeline for Deployment

Given the mental health, substance use, and suicide crisis facing our country, and the need for the life-saving resources provided by the 988 Lifeline, we encourage the FCC to implement a swift

⁴ “Suicide Data and Statistics”. U.S. Centers for Disease Control and Prevention, National Center for Injury Prevention and Control. (April 2024). <https://www.cdc.gov/suicide/facts/data.html>

⁵ “The Community Responder Model”. Center for American Progress. (October 2020). <https://www.americanprogress.org/article/community-responder-model/>

⁶ “988 Suicide & Crisis Lifeline: The First Year and Beyond”. U.S. Department of Health and Human Services, Substance Abuse and Mental Health Services Administration. (April 2024). <https://www.samhsa.gov/sites/default/files/988-one-year-anniversary-issue-brief.pdf>

timeline that ensures people in crisis are able to connect with a call center near them to receive support as expeditiously as possible. We support the Commission's proposed timeline of six months to implement text-to-988 georouting requirements.

Legal Authority

We strongly support the FCC's tentative conclusion that they have authority under Title III of the Act and the 21st Century Communications and Video Accessibility Act of 2010 (CVAA),⁷ to adopt rules requiring covered text providers to deliver georouting data with covered 988 text messages. People with hearing and speech disabilities rely on text as a form of communication, making text messaging an essential part of emergency communication for this community. Ensuring that anyone, no matter how they communicate, can access the 988 Lifeline has significant public benefit.

We look forward to the Commission quickly implementing final rules that allow for the immediate implementation of 988 georouting for text messages, as the public interest requires no less for the above reasons. If you have any further questions regarding our position, please don't hesitate to contact us at NAMI.

Sincerely,



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⁷ 47 U.S.C. §§ 201, 218, 251(e), 301, 303, 307, 309, 316, and 332; Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA), Pub. L. No. 111-260, 124 Stat. 2751 § 104 (2010) (codified at 47 U.S.C. §§ 617, 618, and 619).