



REIMAGINE

Crisis Response

April 3, 2025

VIA ECFS

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

RE: Implementation of the National Suicide Hotline Act of 2018; *Wireline Competition Bureau Seeks Further Comment on Privacy Issues Related to Text-To-988*, WC Docket No. 18-336.

Dear Chairman Carr,

In 2020, President Trump signed the 988 Suicide & Crisis Lifeline into law. Since the 988 Lifeline's implementation in July of 2022, more than [14.5 million](#) help seekers have been connected to trained crisis counselors who provide mental health intervention services through calls, chat, and text. We thank you and the Federal Communications Commission (FCC) for your ongoing leadership on the implementation of 988 and your steadfast commitment to engaging with advocates in the process.

The undersigned organizations represent an ever-expanding coalition of multi-sector national leaders committed to building a system that responds to people experiencing mental health, suicide, or substance use crisis. Our groups 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 response to your request for targeted comments regarding potential privacy issues related to proposed rules requiring covered text providers to support a georouting solution for texts to the 988 Suicide and Crisis Lifeline.

We are grateful to the FCC for its recent work to finalize a rule requiring covered providers to implement a georouting solution for wireless calls to 988, and its proposed rule for the implementation of a georouting solution for texts to 988. Our organizations strongly support these efforts because we believe that everyone, regardless of how they reach out to 988, should be connected to support through a local crisis center that can direct them to services in their community. Routing calls to the nearest crisis center enables individuals reaching out to 988 to receive a more personalized, local response without revealing their precise location. Local crisis centers are in the best position to connect help seekers with local mental health care, resources,

and support that can help that person beyond the initial crisis. Furthermore, a June 2024 National Alliance on Mental Illness (NAMI) – Ipsos [poll](#) revealed that 52% of individuals would be more likely to reach out to 988 if they were connected to a crisis center in their state or local area.

In the instant Notice, the FCC seeks further comment on Privacy Issues Related to Text-To-988, through which it requests details on any potential privacy implications, protections, and considerations for georouting texts. Our organizations agree that preserving the privacy of help seekers reaching out to 988 is of paramount importance to the long-term success of 988, and to the wellness of our country. Millions of individuals reach out to 988 each year for support, knowing their request for help will be confidential. Ensuring that 988 can continue to offer confidential services to everyone is critical because [poll](#), nearly two-thirds (63%) of American adults are more likely to contact 988 if they believe their call will be anonymous. Establishing trust in the 988 Lifeline is essential to ensuring that people in crisis are not discouraged from using the service when they need it most.

We are grateful to the FCC for continuously seeking input and expertise from stakeholders throughout the implementation of 988. To ensure we build a service that American’s can rely on, it remains extremely important to engage stakeholders across a broad range of interests– from people with mental illness and their families to mental health providers and emergency response professionals.

We appreciate the FCC’s careful attention to this issue and look forward to our ongoing work with the FCC as it continues its successful implementation of 988, including georouting for texts. If you have any further questions, please don’t hesitate to contact Jennifer Snow (jsnow@nami.org).

Sincerely,

American Academy of Pediatrics
American College of Emergency Physicians
American Foundation for Suicide Prevention
Behavioral Health Link
CIT International
Connections Health Solutions
Depression and Bipolar Support Alliance (DBSA)
Fountain House
Legal Action Center
Meadows Mental Health Policy Institute
Mental Health America
National Alliance on Mental Illness (NAMI)
National Association of Counties (NACo)
National Association of County Behavioral Health and Developmental Disability Directors (NACBHDD)

National Association for Rural Mental Health (NARMH)
National Association of Social Workers
National Association of State Mental Health Program Directors (NASMHPD)
National Council for Mental Wellbeing
Police, Treatment, and Community Collaborative (PTACC)
Recovery Innovations, Inc.
Solari Crisis & Human Services
The Trevor Project
Youth Village

Cc: Commissioner Geoffrey Starks
Commissioner Nathan Simington
Commissioner Anna M. Gomez