

March 16, 2020

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

*Re: Reply Comment on Implementation of the National Suicide Hotline Improvement Act of 2018; WC Docket No. 18-336*

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Dear Secretary Dortch,

We thank the Federal Communications Commission (FCC) for consideration in the Notice of Proposed Rulemaking to designate “988” as the three-digit dialing code for the national mental health and suicide prevention crisis line.

Designating 988 will make it easier for individuals in crisis to access life-saving resources in a time of need, and we applaud the FCC’s enduring support for this effort. We also urge the FCC to consider the urgency of the mental health and suicide crises and to continue to prioritize the needs of those affected by, and who work to treat, these major public health issues.

**Expedient and Effective Implementation**

It is crucial that the three-digit hotline be made available as readily as possible. Specifically, the undersigned groups are in support of FCC’s Notice of Proposed Rulemaking which calls for an 18-month implementation period.

Incidences of mental health conditions and suicide rates are increasing every year. Today, suicide is the 10<sup>th</sup> leading cause of death in the United States and mental health conditions impact 1-in-5 Americans. The National Suicide Prevention Lifeline (Lifeline) is the public’s mental health safety net, but the Lifeline’s ten-digit hotline number can be difficult to remember, especially in a moment of crisis. We urge the FCC to designate 988 for the national crisis hotline and finalize the 18-month implementation timeline that will allow the public to realize its benefits in a way that’s efficient and effective.

The designation of the 988 hotline is a historic opportunity to improve crisis response in the United States and implementation should not be unnecessarily delayed. We appreciate the landmark nature of this new number and recognize the logistical challenges cited by wireless and wireline industry comments. We concur that dialing delays would be untenable for a hotline to connect individuals in crisis as quickly as possible and would be harmful and confusing for callers attempting to access 988.

We are encouraged by wireline and wireless commitment to making 988 successful and nationally accessible.

The FCC noted that designating 988 will facilitate access to life-saving services, and if the three-digit code were to reduce suicide mortality risk by a fraction of one percent, it would be well worth its cost. Nearly one-half of the American public has been impacted by suicide, and the estimated national cost of

suicide and suicide attempts is over \$90 billion. Every day we wait for 988, we lose the opportunity to save more lives and cut these costs.

### **Appropriate Resources**

The Lifeline’s network of over 170 crises call centers answers millions of calls every year, including over 2 million crisis calls in 2018. Transitioning the Lifeline’s current ten-digit number to a three-digit hotline will encourage help-seeking and likely increase the volume of calls to Lifeline member centers.

Appropriate funding for local crisis call centers would greatly improve State’s capacity to answer callers and connect individuals with local support, but a third of the Lifeline’s member centers answer Lifeline calls without any specific funding for doing so. We are encouraged by Congressional and State efforts to support Lifeline funding and urge the FCC to support making necessary investments available to readily prepare call centers for 988 implementation.

When call centers have appropriate resources, we know they can be more effective. Recent examples have shown that additional funding for crisis call centers quickly and markedly improve call center performance. With additional State Capacity funding Washington’s answer rate increased from 43% in 2017 to 82% in 2019, despite an increase in call volume, and Mississippi’s in-state answer rate increased from 40% in 2017 to 85% in 2019.

### **Conclusion**

The expedient and effective implementation of the 988 dialing code in 18-months, coupled with appropriate resourcing for the National Suicide Prevention Lifeline and its network of crisis call centers, will transition the United States’ mental health and suicide crisis response system into the 20<sup>th</sup> century.

Sincerely,

American Association of Suicidology

Mental Health America

American Foundation for Suicide Prevention

National Alliance on Mental Illness

American Psychiatric Association

National Council for Behavioral Health

American Psychological Association

RI International

Association for Behavioral Health and Wellness

The Trevor Project

Behavioral Health Link

Vibrant Emotional Health

Centerstone

Zero Suicide International

Eating Disorders Coalition