



May 8, 2023

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: WC Docket No. 18–336; “Ensuring the Reliability and Resiliency of the 988 Suicide & Crisis Lifeline; Rules Concerning Disruptions to Communications; Implementation of the National Suicide Hotline Improvement Act of 2018”

Dear Secretary Dortch:

NAMI, the National Alliance on Mental Illness, is the nation’s largest grassroots mental health organization, and we are dedicated to building better lives for the millions of Americans affected by mental illness. We thank you for all the Federal Communications Commission (FCC) has done to make it easier for people experiencing a mental health or suicide crisis to get help through the 988 Suicide and Crisis Lifeline. We also appreciate FCC’s recognition of the need for regulations to require notification when access to the 988 Lifeline is compromised or the 988 Lifeline system experiences an outage. We appreciate the opportunity to provide comments on these proposed rules.

In December 2022, the 988 Lifeline system experienced a nationwide outage that lasted several hours, rendering this vital service inaccessible to voice callers. Once the Department of Health and Human Services’ (HHS) Substance Abuse and Mental Health Services Administration (SAMHSA) was made aware of the outage, they directed the public to rely on alternative means to contact the hotline, such as text or webchat. Planning and preventing future outages will be important to building a reliable service for people in crisis. This proposed rule is an important step to ensure that timely and actionable information about 988 service outages are appropriately communicated such that we can more effectively help people in a suicide or mental health crisis. Additionally, this rule will help information gathering for any future outages, supporting technical and procedural improvements that will strengthen 988 as a resource for people in emotional distress.

We agree with the FCC’s assessment that, similar to 911, 988 is a necessary public service that can be leveraged for life saving services. In fact, it is likely that with a well-resourced 988 Lifeline network, certain calls that have traditionally been handled by the 911 and emergency response systems may in fact be addressed within 988. Thus, it is important to learn about outages that impact service to this network and utilize that information to make improvements that can support the reliability of the network.

Overall, we are supportive of the proposed rule and offer the following comments. Specifically, NAMI requests that FCC do the following:

- *Expand the definition of “covered 988 service provider” and reporting outages (sections A3-A5).* In the proposed rule, the FCC provides a definition of “covered 988 service providers” to include any provider that provides the 988 network with capabilities to receive, process or forward calls and “seeks comment whether to require cable, satellite, wireless, wireline, and interconnected voice over internet protocol (VoIP) providers (collectively, originating service providers) to report outages that potentially affect the 988 Lifeline.” We agree with this proposed definition as a foundation and would encourage the FCC to include in the final rule a definition that encompasses the various ways people connect to the 988 network. However, we would encourage the inclusion of cable, satellite, wireless, wireline, and interconnected voice over internet protocol (VOIP) providers to specifically report into the NORS system, similar to how 911 outages are reported. Having more sources of data regarding outages will enhance the ability of the FCC and the 988 administrator to identify what is needed to create a more reliable network.
- *Require reporting for outages to 988 texts (section A6).* The FCC seeks comment on whether outages affecting covered 988 texts should be reported. We encourage the FCC to include this in the final rule requirements for reporting outages to text messaging within the 988 Lifeline network. Recent data from the Centers for Disease Control and Prevention (CDC) reports that nearly [3 in 5 teen girls](#) had feelings of persistent sadness or hopelessness in 2021. That same year, the CDC’s data shows that half of LGBTQ+ teens thought about suicide and [1 in 4 attempted suicide](#). With text messaging being a primary way that young people want to communicate, we have an obligation to understand when text to 988 is unavailable and what steps we can take to ensure the service is more reliable in the future. Requiring reporting of outages to the text-to-988 Lifeline would assist in that effort.
- *Add expectations for “988 Special Facilities”(section B12-B13).* The common vision for 988 is that it will serve as a resource to connect individuals in crisis to their local mental health service system and collaborate with local emergency response. Thus, it will be important that local entities are notified regarding outages to the 988 Lifeline network. In the proposed rule, the FCC defines “988 special facilities” as SAMHSA, the Veterans’ Administration (VA) and the 988 administrator, and directs 988 services providers to notify these entities during outages. We agree that SAMHSA, the VA and the 988 administrator should be notified of any outages, and we encourage the FCC to also express the expectation that the 988 administrator, SAMHSA and/or VA will notify impacted local 988 call centers of system outages in a timely way.

Providing local 988 call centers with timely information regarding outages will allow them to leverage existing relationships to quickly respond by notifying the community and establishing alternatives for people who require emergency mental health support during the outage. Furthermore, many local communities have processes in place related to 911 outages, or communicating other essential information to the community, and these systems could be leveraged to create a more seamless notification to the community regarding the 988 outage.

Again, NAMI applauds the FCC’s significant role in making 988 a reality, and we urge you to continue your leadership role to ensure universal access to this life-saving crisis line for the countless people

who require emergency mental health support every year. If you have any questions or would like to discuss further, please contact me at hwesolowski@nami.org.

Sincerely,

A handwritten signature in black ink that reads "Hannah Wesolowski". The signature is written in a cursive, flowing style.

Hannah Wesolowski
Chief Advocacy Officer
National Alliance on Mental Illness (NAMI)