Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
Implementation of the National Suicide Hotline Act of 2018 WC Docket No. 18-336

Reply Comments of the
Alliance for Telecommunications Industry Solutions

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these replies in response to the comments made in response to the Second Further Notice of Proposed Rulemaking (Second FNPRM), released April 26, 2024, in the above-referenced docket. In the Second FNPRM, the Federal Communications Commission (Commission) seeks input regarding the routing of calls to the 988 Suicide & Crisis Lifeline (988 Lifeline) and proposes to require wireless carriers to implement one or more georouting solutions for calls to the 988 Lifeline. In its comments, ATIS urges the Commission to afford service providers with the flexibility to develop and implement their own 988 routing solutions. Instead of focusing on specific solutions, ATIS recommends that the Commission focus on identifying requirements and allow providers the flexibility to deploy their own solutions that meet these requirements. Finally, ATIS notes that it is working on a study on 988 georouting that it believes will be valuable to all providers implementing 988 georouting.
I. Background

These reply comments were developed by ATIS IMSESINET, a joint project led by ATIS’ Wireless Technologies and Systems Committee (WTSC) and coordinated with ATIS’ Emergency Services Interconnection Forum (ESIF) and Packet Technologies and Systems Committee (PTSC).

- **ATIS’ Wireless Technologies and Systems Committee (WTSC)** develops wireless radio access, system, and network solutions related to terrestrial and non-terrestrial wireless and/or mobile services and systems. WTSC develops and continues to enhance solutions necessary to support a U.S. public warning system through the Wireless Emergency Alert system. ATIS is the 3GPP North American partner, and WTSC provides critical technical review and input for necessary contributions into global standards to maintain interoperability.

- **ATIS ESIF** develops NG911 and location accuracy requirements and solutions. ESIF works with industry, governmental, standards, and public safety organizations to apprise them of its deliberations and decision and ensure the proper coordination of activities. ESIF identifies and resolves technical and operational issues to facilitate interconnection of emergency services networks with other networks (e.g., wireline, cable, satellite, Internet, etc.). The ESIF Next Generation Emergency Services and Messaging (NGESM) Committee develops standards and other documentation related to emergency services (i.e., E9-1-1 and Next Generation 9-1-1) with a focus on architectures, functions, and interfaces for North American communications networks. The NGESM Committee is also working on a set of minimum practical requirements to ensure consistent, valid, verifiable, and reproducible location data in a variety of access environments based on sound engineering and statistical practice.

- **ATIS PTSC** develops and recommends standards and technical reports related to services, architectures, and signaling, including emergency services and Emergency Telecommunications Service (ETS). The PTSC also coordinates and develops standards and technical reports relevant to telecommunications networks in the U.S., reviews and prepares contributions on such matters for submission to the U.S. International Telecommunication Union Standardization (ITU-T) and the U.S. International Telecommunication Union Radiocommunication (ITU-R) Study Groups or other standards organizations, and reviews for acceptability or per contra the positions of other countries in related standards development and takes or recommends appropriate actions.
II. Reply Comments

A. The Commission Focus on General Requirements and Not Mandate Specific Solutions

In the Second FNPRM, the Commission proposes to require wireless carriers to implement one or more georouting solutions for calls to the 988 Lifeline.\(^1\) ATIS appreciates the Commission’s interest in ensuring that calls to the 988 Lifeline are properly routed to appropriate 988 call centers and notes that service providers and other stakeholders have been working diligently on this issue. As CTIA notes in its comments, since the need for enhancing 988 routing was identified, the wireless industry has played a leading role in developing georouting solutions for 988 calls and has continued working towards an industry-led initiative to provide 988 georouting information for wireless 988 voice callers across the nation.\(^2\)

ATIS believes that the Commission can best facilitate the deployment of solutions to ensure that callers in crisis are connected with the local support they need by focusing on general requirements, rather than by mandating specific solutions. As noted by CTIA in its comments, a general obligation on service providers to provide georouting information to the 988 Lifeline would provide sufficient flexibility that would allow providers and the Lifeline to maximize the capabilities of technology currently available to wireless providers and the 988 Lifeline’s existing network configurations, and create incentives for continued evolution of georouting solutions over time.\(^3\) ATIS agrees with Comtech Telecommunications Corp (Comtech), which recommends that the Commission adopt “technology-neutral rules with sufficient flexibility to allow wireless providers to potentially implement more than one georouting solution…”\(^4\)

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1 Second FNPRM at ¶13.
2 CTIA Comments at pp. 3-4.
3 CTIA Comments at p. 5.
4 Comtech Comments at p. 9.
ATIS believes that there is no need for the Commission to mandate a specific solution. All nationwide carriers have been working with SAMHSA and Vibrant Emotional Health (Vibrant) on solutions and are in the midst of implementing these solutions.\textsuperscript{5} While each solution differs, each would allow the routing of 988 calls to an appropriate call center based on the rough location of the caller. ATIS agrees with CTIA that, “with georouting solutions soon becoming available to the 988 Lifeline, it is not necessary for the Commission to adopt 988 georouting rules at this time.”\textsuperscript{6} To the extent that the Commission nonetheless adopts new rules, it should ensure that these rules do not interfere with service providers’ and the 988 Lifeline’s ability to deploy the georouting solutions already in progress as soon as practicable.

A more flexible, requirements-based approach would facilitate the timely deployment of 988 routing solutions. Service providers could continue their deployments and, as long as the solutions meet the requirements identified by the Commission, would not have to worry about impacts to in-progress implementations. T-Mobile USA, Inc., notes in its comments that, within days of the reply comment filing deadline in this proceeding, the industry partners and the Substance Abuse and Mental Health Services Administration (SAMHSA) will be in a position to run final tests before fully launching the six-digit georouting solution that achieves the Commission’s objective of connecting callers in crisis with local support.\textsuperscript{7} ATIS agrees with T-Mobile that “consideration of last-minute regulations only risks complicating the rollout by introducing potential uncertainty as to specification or requirements, which could then potentially result in a pause in the current implementation schedule.”\textsuperscript{8}

\textsuperscript{5} CTIA Comments at pp. 1-2; see also Vibrant Comments at p. 3 (noting that Vibrant has worked closely with the stakeholders, including carriers, partners, the wireless industry, public safety organizations, and federal partners to identify georouting solutions).
\textsuperscript{6} CTIA Comments at p.2.
\textsuperscript{7} T-Mobile Comments at p. 7.
\textsuperscript{8} T-Mobile Comments at p. 7.
ATIS also notes that routing solutions must be coordinated with the Vibrant (the Lifeline Administrator), through which calls are routed. Routing to the appropriate crisis call center is handled by a centralized routing system overseen by the Lifeline Administrator and supported by a grant from SAMHSA.

**B. Protecting Consumer Privacy Is Paramount**

ATIS agrees with the Commission that “transmitting precise location information with calls to the 988 Lifeline presents a variety of technical, legal, and privacy concerns that would require significant investigation and time to resolve.”\(^9\) ATIS supports the Commission’s decision to only consider georouting (i.e., routing based on rough location) rather than geolocation (i.e., routing based on precise location) for the 988 Lifeline at this time.\(^10\) The failure to protect callers’ privacy may negatively impact the trust that consumers have in the 988 Lifeline. ATIS therefore agrees with Vibrant that the protection of consumer privacy is paramount.\(^11\) ATIS joins with CTIA in supporting the Commission’s assessment that a georouting solution that provides location information sufficient for the Lifeline to route calls to a geographically appropriate crisis call center, such as by identifying the county where the call originated, would best serve georouting needs while minimizing privacy concerns.\(^12\)

**C. ATIS ESIF Study on 988 Georouting Is Under Development**

ATIS ESIF is currently conducting a study of 988 georouting, including a high-level technical description of the steps to achieve, as well as a description of the architecture and signaling necessary to support 988 georouting. The study will identify a standards-based method that will work with both Session Initiation Protocol (“SIP”) and Integrated Services Digital

\(^9\) Second FNPRM at ¶9.

\(^10\) Second FNPRM at ¶13, n. 53.

\(^11\) Vibrant Comments at p. 6.

\(^12\) CTIA Comments at p. 4 (citing FNPRM at ¶¶17-20).
Network User Part (“ISUP”) messaging to assist the 988 Lifeline in routing calls to the appropriate crisis center with coarse location information that does not infringe upon customer privacy. The resulting documentation is expected to include guidance for an initial series of steps and the appropriate contact information for SAMHSA and Vibrant to facilitate each provider working directly with the 988 Administrators as they move forward with meeting the Commission’s requirements. ATIS believes that this report will be valuable to all service providers, including smaller operators, seeking to achieve 988 georouting.13

III. Conclusion

ATIS WTSC appreciates the opportunity to respond to the comments to the Second FN RPM and urges the Commission to consider the input above. Given the considerations discussed above, ATIS strongly believes that each service provider must be afforded the flexibility to develop and implement its own 988 routing solution. ATIS also urges the Commission to encourage non-nationwide carriers to work with SAMHSA and Vibrant, as the nationwide providers did.

Respectfully submitted,

Thomas Goode
General Counsel
Alliance for Telecommunications Industry Solutions
1200 G Street, NW
Suite 500
Washington, DC 20005
(202) 628-6380
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13 ESIF approved these work items on March 6, 2024. While ESIF intends to aggressively address these issues, the completion of these efforts will depend on member contributions and whether the input/expertise of other ATIS groups will be needed. This work will primarily involve ATIS ESIF, but may also include input from ATIS PTSC, WTSC, and/or Industry Numbering Committee.