

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

In the Matter of)	
)	
Implementation of the National Suicide Hotline Improvement Act of 2018)	WC Docket No. 18-336
)	
The Use of N11 Codes and Other Abbreviated Dialing Arrangements)	CC Docket No. 92-105
)	

**COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Public Notice* released November 8, 2018, in the above-referenced dockets. This *Public Notice* seeks comment on the implementation of the National Suicide Hotline Improvement Act of 2018 (the Act), which requires the Federal Communication Commission (Commission) to study and issue a report on the implementation of a 3-digit dialing code for a national suicide prevention and health crisis hotline. ATIS is pleased to provide the input below relating to the logistics associated with the designation of the proposed dialing code.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless and wireline service providers, equipment manufacturers, broadband providers, software

developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the Long Term Evolution (LTE) and LTE-Advanced wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS' Industry Numbering Committee (INC) addresses and resolves industry-wide issues associated with planning, administration, allocation, assignment, and use of the North American Numbering Plan (NANP) numbering resources within the NANP area. INC guidelines and recommendations are used by the North American Numbering Plan Administration (NANPA), the Number Pool Administration (PA), and the Canadian Radio Television and Telecommunications Commission (CRTC) in the management of numbering resources.

II. COMMENTS

In the *Public Notice*, the Commission seeks comment on implementation of the Act, which among other things directs the Commission to study and report on the feasibility of establishing a 3-digit dialing code for a national suicide prevention and health crisis hotline.¹ The Commission explains that, under the Act, it must provide a report recommending whether an N11 dialing code or other simple, easy-to-remember, 3-digit dialing code should be used for a national hotline.²

ATIS INC supports efforts to reduce the risk of suicide and believes that facilitating access to resources such as health crisis hotlines is an important goal. INC notes that creating a

¹ *Public Notice* at p. 1.

² More information about existing Easily Recognizable Codes (ERC) can be found in https://www.nationalnanpa.com/reports/reports_npa.html.

new, easily recognizable three-digit code (using repeating or sequential numbers) could potentially be implemented more quickly and with less risk of confusion than repurposing an N11 code. Repurposing an N11 code would require sufficient lead time prior to implementation to inform any existing users of the impending new use of the code, and for the organizations that rely on the codes to enable end users to reach them to modify their systems and practices. Using a new easily recognizable code, on the other hand, would pose less risk of confusion because there would be no existing users to consider; however, this approach would remove an available area code from future use.

Should a new non-N11 code be created, ATIS INC strongly recommends that its first digit not be either a “0” or a “1.” Use of a three-digit number starting with 0 or 1 (i.e., 0xx or 1xx) is inconsistent with the current numbering and dialing plan, which specifically excludes codes 000 to 199 from the NANP.³

Should an existing N11 code be repurposed for the hotline, there will be a need for more significant customer education and outreach efforts because both the current users and new users of the code would need to be educated. Moreover, organizations that rely on the particular N11 code will need time to adapt their practices and systems. Number assignment practices have historically required that any repurposed or reclaimed number sit unused for some time to avoid system and consumer confusion.⁴ Therefore, if the Commission were to repurpose an existing N11 code, it should allow the designated N11 code to sit unused for a period of time and, during that period of time, provide time for educational efforts to be implemented to ensure that any

³ See *Numbering and Dialing Plan with the United States* (ATIS-0300076) Sections 6.1, 6.2, and 6.3.

⁴ For example, the 456 NPA was recently reclaimed and will sit idle for a period of five years to avoid any system or customer confusion. For more information, see NANPA Planning Letter 513 https://www.nationalnanpa.com/pdf/PL_513.pdf and https://www.nationalnanpa.com/number_resource_info/456_codes.html.

existing users of that code are informed of its new use. This is particularly important where a code is to be used in crisis situations because non-crisis calls to a suicide hotline could divert resources away from calls that are literally about a life or death situation. ATIS INC would also recommend that the Commission avoid repurposing N11 codes. For example, while use of the 411 and 611 codes has not been formally designated by the Commission, many INC member companies use 411 for directory assistance and 611 for customer repair, and other service providers likely do so as well. Other important state and local government and civil society stakeholders also rely on the other N11 codes. This use is acknowledged in the industry's *Central Office Code (NXX) Assignment Guidelines*, which notes existing designated or common uses of N11 codes:

- 211 – Community Information and Referral Services
- 311 – Non-Emergency Police and Other Governmental Services
- 411 – Local Directory Assistance
- 511 – Travel Information Services
- 611 – Repair Service
- 711 – Telecommunications Relay Service (TRS)
- 811 – Pipeline and Utility Safety
- 911 – Emergency⁵

Regardless of whether the Commission chooses to repurpose an existing N11 code or to establish a new code, there will be impacts to existing industry standards. ATIS INC is prepared to examine these changes in an expeditious manner.

Finally, ATIS INC would recommend that the Commission make its report on this matter available for public review and comment before it is submitted to Congress.

⁵ *Central Office Code (NXX) Assignment Guidelines (COCAG)* (ATIS-0300051) Section 4.6.

III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *Public Notice* and urges the Commission to consider the input above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode".

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