

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Petition of Care2, Inc. for the Use of	)	RM No. 11746
An N11 Code or other Abbreviated	)	
Dialing Code for Nationwide Suicide	)	
Prevention	)	

**Comments of the Alliance for Telecommunications Industry Solutions**

The Alliance for Telecommunications Industry Solutions (ATIS) submits these comments on behalf of its Industry Numbering Committee (INC) in response to the *Public Notice* released April 9, 2015, in the above-referenced docket. The *Public Notice* seeks comments supporting or opposing the *Petition for Rulemaking (Petition)* filed by Care2, Inc., asking the Federal Communications Commission (Commission) to establish a three-digit phone number for suicide and crisis hotlines. ATIS INC submits these comments solely to provide information pertaining to the existing assignment of N11 codes.

ATIS is a global standards development and technical planning organization that develops technical and operations standards for information and communications technologies (ICT). ATIS' diverse membership includes key stakeholders from the ICT industry, including wireless and wireline service providers, equipment manufacturers, software developers, consumer electronics companies, internet service providers and public safety agencies. Industry subject matter experts work collaboratively in ATIS' open industry committees such as ATIS INC, which 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 service providers in the management of numbering resources.

In the *Petition*, Care2, Inc. asks the Commission to allow the use of an N11 Code or other abbreviated dialing code for nationwide suicide prevention.<sup>1</sup> The *Petition* further notes that “[a]lthough N11 numbers are in use to some degree, 611 or 811 are not officially assigned and could potentially be put into formal use for this life-saving purpose.”<sup>2</sup> ATIS INC notes that this statement is not correct and may be based on an outdated Commission “Fact Sheet on Abbreviated Dialing Codes – N11” that is still publically available.<sup>3</sup> In 2005, the Commission did assign 811 as a national abbreviated dialing code to be used by state One Call notification systems to provide advanced notice of excavation activities in compliance with the Pipeline Safety Act of 2002.<sup>4</sup> Further, while 611 may not be officially assigned by the Commission, it should be noted that 611 already is widely deployed across the telecommunications industry for customers to reach repair or customer service.

ATIS INC recommends that the Commission update its Fact Sheet on this matter to reflect current N11 assignments and widespread uses. These assignments and uses are correctly reflected on the NANPA website at

[http://www.nanpa.com/number\\_resource\\_info/n11\\_codes.html](http://www.nanpa.com/number_resource_info/n11_codes.html):

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<sup>1</sup> *Petition* at p. 1.

<sup>2</sup> *Id.*

<sup>3</sup> The fact sheet is available from the following link: [http://transition.fcc.gov/Bureaus/Common\\_Carrier/News\\_Releases/2000/nrc0036a.html](http://transition.fcc.gov/Bureaus/Common_Carrier/News_Releases/2000/nrc0036a.html) (last accessed on May 8, 2015).

<sup>4</sup> See *Sixth Report and Order* in CC Docket No. 92-105 (released March 15, 2005).

<b>N11 CODE</b>	<b>DESCRIPTION</b>
211	Community Information and Referral Services
311	Non-Emergency Police and Other Governmental Services
411	Local Directory Assistance
511	Traffic and Transportation Information (US); Provision of Weather and Traveler Information Services (Canada)
611	Repair Service
711	Telecommunications Relay Service (TRS)
811	Access to One Call Services to Protect Pipeline and Utilities from Excavation Damage (US); Non-Urgent Health Teletriage Services (Canada)
911	Emergency

### **Conclusion**

ATIS INC appreciates the opportunity to provide these narrowly-focused comments in response to the Care2, Inc. *Petition*.

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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