

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

In the Matter of)	
)	
Ensuring the Reliability and Resiliency of the 988 Suicide & Crisis Lifeline)	PS Docket No. 23-5
)	
Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications)	PS Docket No. 15-80
)	
Implementation of the National Suicide Hotline Improvement Act of 2018)	WC Docket No. 18-336

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

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Network Reliability Steering Committee (NRSC), hereby responds to comments submitted in response to the *Notice of Proposed Rulemaking (NPRM)*, released January 27, 2023, in the above-referenced dockets. As explained below, ATIS NRSC opposes the recommendations made by commenters that would require service providers to notify 988 special facilities of outages impacting 911 or to report information, such as telephone numbers, for individuals who were unable to reach the 988 Lifeline during an outage. To the extent that the Commission imposes requirements pertaining to 988 outages, ATIS NRSC supports the comments from the Substance Abuse and Mental Health Services Administration (SAMHSA) recommending that service providers inform SAMHSA, the Department of Veterans Affairs (VA), and the 988 Network Administrator of service disruptions and allow the 988 Network Administrator to inform the appropriate crisis centers.

ATIS NRSC disagrees with the proposal made by Mental Health America in its comments that 988 special facilities should be informed of outages impacting 911 to ensure crisis counselors are aware of the availability of 911 PSAPs if needed.¹ ATIS NRSC believes that this recommendation may be based on an incomplete picture of network operations and how network disruptions impact those operations. A disruption on an originating service provider network would not affect the ability of a crisis center or PSAP to receive and process calls as normal and would likely have only minimal impacts to call volume. The outage would only impact the customers of the originating service provider experiencing the outage. Callers on all other networks in the outage area would still be able to contact 988.

ATIS NRSC believes that the concerns expressed by Vibrant Emotional Health (Vibrant) in its comments regarding routing mismatches are unwarranted.² While it is true that an outage may affect the originating service providers' customers within the outage area and may prevent them from dialing 988, the area codes of the customers' devices are irrelevant. Moreover, customers of that provider who are located outside of the outage area would still be able to dial and connect to 988. Even if a caller's area code is the same as a crisis center that is located in a current outage area, that call will be processed and forwarded to that center because 988 is functioning as expected. Because a local crisis center within an originating service provider's outage area can still receive and process calls, ATIS NRSC believes that there is no need to implement routing changes or take a center offline in the area experiencing an outage as suggested by some commenters.³

ATIS NRSC opposes the recommendation made by Vibrant and SAMHSA that service

¹ Mental Health America Comments at p. 2.

² Vibrant Comments at pp.4-5.

³ See Vibrant Comments at p.3; SAMSHA Comments at pp.1-2.

providers report information, such as telephone numbers, for individuals who were unable to reach the 988 Lifeline during an outage to the 988 Network Administrator.⁴ ATIS NRSC has significant concerns regarding the technical feasibility of this recommendation. ATIS NRSC believes that there are many situations in which service providers would not know or be able to determine this information. ATIS NRSC further believes that there may be privacy concerns with providing personally identifying information, such as telephone numbers, to the 988 Network Administrator.

ATIS NRSC notes that SAMHSA, in its comments, proposes that providers inform SAMHSA, the VA, and the 988 Network Administrator of geographically-limited service disruptions and allow the 988 Network Administrator to inform the appropriate crisis centers.⁵ SAMHSA notes that, given routing complexities, the 988 Network Administrator is best positioned to pass along these notifications at this time and will have the most updated routing tables and patterns on any given day.⁶ ATIS NRSC agrees with this recommendation, and notes that this is consistent with the views expressed by ATIS NRSC on this matter in its comments.

⁴ Vibrant Comments at p. 3, SAMHSA Comments at p. 2.

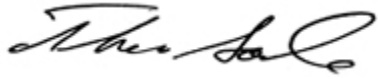
⁵ SAMHSA Comments at p. 1.

⁶ *Id.* at pp-1-2.

III. CONCLUSION

ATIS appreciates the opportunity to respond to the comments to the *NPRM* and urges the Commission to consider the input above.

Respectfully submitted,

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

Thomas Goode
General Counsel
Alliance for Telecommunications Industry
Solutions
1200 G Street, NW
Suite 500
Washington, D.C. 20005
(202) 628-6380

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