



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Office of the Secretary
PO Box 47890
Olympia, WA 98504-7890

June 28th, 2024

Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Second Further Notice of Proposed Rulemaking, National Suicide Hotline Act of 2018, WC Docket No. 18-336, FCC 24-45 (April 25, 2024)

The Washington State Department of Health (WA-DOH) appreciates the opportunity to comment on the Second Further Notice of Proposed Rulemaking (FNPRM), National Suicide Hotline Act of 2018, published in the Federal Register on May 29, 2024 (89 FR 46340, FR Document 2024-11761).

WA-DOH, together with the Washington State Health Care Authority (HCA), implements and regulates the state's 988 system and program. WA-DOH generally supports the FCC's proposal to require georouting of wireless 988 calls as a lifesaving means to reduce crisis response times, especially in rural areas; improve accuracy of referrals and resources; and increase equity without sacrificing help seeker confidentiality and safety.

In response to the specific questions posed by the FCC, WA-DOH offers the following comments corresponding to the numbered paragraphs in the FNPRM:

Paragraph 9. WA-DOH agrees that requiring wireless carriers to implement a georouting solution for the 988 Lifeline is necessary to ensure that the critical benefits of georouting are realized nationwide and within a reasonable time period. Establishing a standard protocol across carriers, as implementation via federal regulation could do, would improve system efficiency and consistency. The protocol would also help crisis centers understand the level of need within each catchment area at a more granular level. However, help seeker privacy must remain paramount, and safeguards must be in place to ensure that they are given opportunities to opt out of location sharing. Additionally, transparent communication to the public regarding precisely what georouting does and does not accomplish would be essential to avoiding any negative impacts on usage due to concerns about compromised confidentiality.

Paragraph 12. WA-DOH respectfully disagrees with the premise that georouting solutions are not needed for help seekers selecting specialized services. Such help seekers, like callers to the main network, would benefit from regionally customized services afforded by georouting. Requiring georouting for specialized services supports equity and innovation and ensures that these calls can be accurately tracked for usage data and other quality-improvement purposes. Georouting would directly increase the use of specialized services in the case of Washington's Native and Strong Lifeline, a 988 subnetwork unique to the state that provides specialized crisis counseling and intervention to Washington callers who identify as American Indian/Alaska Native. All such help seekers in the state pay Washington's 988 excise tax and should have the benefit of this service, but the option is not currently available to those calling from non-Washington area codes.

Paragraph 14. Whether using a state-level boundary would be too broad where there are multiple crisis centers within a particular state would likely depend on the state. In Washington's case, state-level boundaries would be too broad. It is unlikely that geographic boundaries would be too granular in a manner that implicates privacy or other concerns. Permitting wireless carriers to implement several different geographic boundaries would negatively impact crisis centers' ability to accurately predict the volume of need and provide services accordingly, and thus it would be a challenge for the state to fund the centers appropriately. This would be especially problematic in areas where multiple languages are spoken by different communities, because a given community could be broken up by the carriers into multiple catchment areas.

Paragraph 16. Regarding the default routing of calls with unreadable routing data, if wireless carriers report that no technical limitations exist that would prevent default routing by area code, that solution is preferred to defaulting to a national back-up. Routing by area code, while imperfect, would at least result in a connection to the closest crisis center some of the time.

Paragraph 19. The public interest benefits of routing help seekers in crisis to geographically appropriate crisis centers outweigh any potential costs because doing so would considerably expedite response times in highly time-sensitive crisis scenarios. For example, if a help seeker's risk assessment indicates that emergency circumstances exist and the person is unwilling to provide their location, the 988 crisis center must reach out directly to 911 for the Public Safety Answering Point (PSAP) to obtain law enforcement approval of a location look-up by the wireless carrier for subsequent dispatch. With more than 5,700¹ PSAPs nationwide and myriad wireless carriers with their own protocols, the process is highly variable and time-consuming. Georouting would enable the 988 counselor to contact the appropriate PSAP with greater accuracy. Similarly, for help seekers in crisis willing to share their location but unable to give a precise address (e.g., "I'm at the bridge by the pavilion"), georouting to the closest 988 crisis center would offer the time-saving benefit of local knowledge. Finally, understanding the geographic origin of calls is important not only for addressing the immediate needs of the help seeker, but also for developing preventive measures locally to address the most pressing issues underlying crisis contacts in a given region.

Paragraph 26. Implementing a georouting solution for texts, when technologically feasible, would offer the same benefits to help seekers using text messages to reach 988 as it would for


¹ 86 FR 34679, 34681

those calling: it would considerably expedite response times in highly time-sensitive crisis scenarios, allow the 988 counselor to contact the appropriate PSAP with far greater accuracy, offer the time-saving benefit of local knowledge of locations, and would help with development of preventive measures for individual regions. Additionally, text messaging allows for greater privacy, as the messages can be sent silently, making this a potentially safer option for some help seekers. Text messaging can also be accomplished in some remote areas where cellular reception is too poor to complete a phone call. For these reasons, the benefits of implementing a georouting solution for texts would likely outweigh the costs.

Paragraph 30. Georouting would further digital equity without compromising confidentiality, which is essential to 988's success, as suicide and experiencing mental health crises continue to be stigmatized in our society. Confidentiality offers a level of safety for help seekers, particularly for those who are or have been adversely affected by inequitable policies and practices that have been noted in the law enforcement and health care arenas. Additionally, help seekers in rural areas, where first responders are fewer and more dispersed, would particularly benefit from faster response times enabled by georouting.

Thank you for considering our comments regarding this important issue. If you have any questions, please contact the Federal Relations Director, Michael Ellsworth, at Michael.Ellsworth@doh.wa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michele R Roberts". The signature is fluid and cursive, with the first name "Michele" being more prominent than the last name "Roberts".

Michele Roberts, MPH, MCHES
Assistant Secretary
Prevention and Community Health Division