February 22, 2024

Chairwoman Jessica Rosenworcel

Federal Communications Commission

45 L Street NE

Washington, DC 20554

Subject:  *Ex Parte Letter* – Petition for 9-8-8 Georouting Rulemaking Process

Dear Chairwoman Rosenworcel:

It has been over eighteen months since the nationwide implementation of the
9-8-8 Suicide & Crisis Lifeline and the resultant evolution of a more prominent role of the states in the administration of that system. The National Suicide Hotline Designation Act of 2020 allowed for states, tribal governments, and territories to collect funds for and to administer the 9-8-8 system for their jurisdictions. Many states, including California, have since enacted legislation to administer and fund their respective 9-8-8 systems. As a result, the roles and responsibilities of states in the context of the 9-8-8 system have changed and grown. When states establish statutory, regulatory, and financial authority over the 9-8-8 systems in their states, the state becomes responsible to local taxpayers and are subject to state legislative oversight.

The California 9-8-8 Technical Advisory Board has been established by California Government Code 53123 to oversee 9-8-8 technology and make recommendations that will improve the interoperability and functionality between 9-1-1 and 9-8-8. One of the key aspects of the interaction between
9-8-8 and 9-1-1 is to ensure that 9-8-8 Lifeline Crisis Centers and the 9-1-1 Public Safety Answering Points are fully interoperable and have technology and procedures that support the needs of both.

Today’s 9-8-8 call and text routing relies on the area code of the 9-8-8 caller, which is not accurate for over 80% of the calls as described in Federal Communication Commission’s (Commission) Report and Order 2020[[1]](#footnote-1), and in the Commission’s 9-8-8 Geolocation Report — National Suicide Hotline Designation Act of 2020[[2]](#footnote-2). On the other hand, because of the Commision’s rulemaking efforts, 9-1-1 location is much more reliable and accurate. These differences make it very difficult to achieve functional interoperability between 9-1-1 and 9-8-8. While the location for 9-1-1 is required, the location of the 9-8-8 contact should remain anonymous unless voluntarily provided, or when mobile crisis response is needed, or when an emergency response is required.

In California, and in other states, the need to route the 9-8-8 contact to the correct 9-8-8 Lifeline Crisis Center, helps ensure that services can be provided accurately, timely, and in accordance with local and state laws. Furthermore, accurate 9-8-8 routing ensures that those in need of help can receive the proper assistance, regardless if they contacted 9-1-1, 9-8-8, or any other method. The current 9-8-8 routing rules are based on antiquated, legacy routing solutions and do not address the specific needs of those using the 9-8-8 system. The current routing rules introduce a single point of failure, expose the 9-8-8 system to cyber security risks, and can introduce longer wait times. Any delay in connecting the 9-8-8 contact to a trained 9-8-8 counselor puts lives at risk.

Furthermore, the existing rules do not allow the states the authority needed to comply with state statutes, implement newer technologies, ensure interoperability between 9-8-8 and 9-1-1, and ensure access and functional needs can be accommodated.

The Commission’s 9-8-8 Geolocation Report and recent letters to the wireless industry to explore 9-8-8 routing solutions[[3]](#footnote-3) indicate the Commission’s 9-8-8 georouting commitment. While the California 9-8-8 Technical Advisory Board appreciates the Commission’s commitment, the California 9-8-8 Technical Advisory Board is petitioning the Commission for an expedited proceeding or an expedited declaratory ruling to improve the accuracy and timlineness of 9-8-8 routing for all 9-8-8 contacts, to include calls, texts, and chats, while preserving the anonymity of the 9-8-8 contact.

When a person contacts 9-8-8, it is important to correctly route the call. California’s 9-8-8 centers have invested the resources using state and local funding to ensure that they can provide the help needed for each 9-8-8 contact. When the 9-8-8 call cannot be properly routed, lives are at risk and desperately needed help is delayed. For those that choose, states must be able to develop and implement any 9-8-8 technological solutions deemed necessary to comply with applicable state legislation or requirements while integrating with the nationwide platform. Simply waiting for a voluntary industry decision to improve 9-8-8 routing is not the solution. The 9-8-8 Technical Advisory Board appreciates your consideration and will provide further comment on the matter in the appropriate forum.

Sincerely,

BUDGE CURRIER

Chair, State of California 9-8-8 Technical Advisory Board

CC: Ms. Marlene H. Dortch

Secretary, Federal Communications Commission

1. See FCC-20-100, Docket No: 18-336. [↑](#footnote-ref-1)
2. See FCC DOC-371709A1, 9-8-8 Geolocation Report — National Suicide Hotline Designation Act of 2020. (rel. Apr. 15, 2021). [↑](#footnote-ref-2)
3. See FCC DOC-397339A1, Chairwoman Calls on Wireless Inducstry and Related Associatoins to Explore 988 Routing Solutoins. (rel. Sept. 28, 2023). [↑](#footnote-ref-3)