



December 20, 2024

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**RE: FCC’s Implementation of the National Suicide Hotline Act of 2018; WC Docket No. 18-336**

Dear Chairwoman Rosenworcel,

The Association for Behavioral Health and Wellness (ABHW) appreciates the opportunity to submit our comments regarding the Federal Communications Commission's (FCC) Third Further Notice of Proposed Rulemaking (FNPR) requiring covered text providers, including wireless providers, to support georouting for 988 text messages. We are grateful to the FCC’s commitment to increasing accessibility to the 988 Suicide and Crisis Lifeline and its services. Establishing a mandate that ensures 988 texts are routed by location rather than area code will enable better access to critical local crisis counselors and resources.

ABHW is the national voice for payers managing behavioral health insurance benefits. Our member companies provide coverage to approximately 200 million people in the public and private sectors to treat mental health (MH), substance use disorders (SUDs), and other behaviors that impact health and wellness. ABHW supports an evidence-based continuum of crisis care for individuals experiencing a behavioral health crisis. Ensuring crisis response and sustaining effective crisis care is vital nationwide and critical to advancing equity.

**Georouting 988 Texts Are Essential to Providing Lifesaving Local Support and Resources**

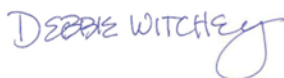
As the country faces an unprecedented MH crisis, expeditious access to the crisis interventions and emotional support that the 988 Lifeline provides is vital. ABHW supports expanding 988 and other behavioral health lines to include multi-modality contact options across voice, text, and chat capabilities. Our members support efforts to continue to educate and expand awareness about the 988 Suicide and Crisis Lifeline, particularly in locations frequented by aging adults, children, and youth populations.

Recent data shows that children and teens predominantly use the 988-text service. The American Foundation for Suicide Prevention (AFSP) cites a 2022 study finding that 76% of texts to the 988 Crisis Text Line in twelve months were generated by youth and young adults 24 and younger.<sup>1</sup> Since 988 texts are routed using cell phone numbers, this leads to text message misrouting. Children and young adults' heavy reliance on texting leaves them vulnerable to 988 text misrouting, creating what could be preventable gaps in crisis prevention and care. Emergency intervention could have benefited approximately 1.66 youth suicide victims annually whose dispatch might have been delayed due to text misrouting.<sup>2</sup>

ABHW fully supports the FCC's FNPR on geo-routing text solutions for the 988 Suicide and Crisis Lifeline. Geo-routing texts will reduce suicide mortality for populations with an increased risk of suicide and outweigh any potential costs. Additionally, rerouting callers to the appropriate crisis contact center will reduce suicide attempts and the accompanying medical, lost work, and lost quality of life costs. This rule will improve access to critical, local MH services while reducing suicide mortality rates.

Thank you for the opportunity to provide feedback on this FNPR. We are committed to engaging with the FCC and other partners to find opportunities to improve behavioral health access. If you have questions, please contact Kathryn Cohen, Senior Director of Regulatory Affairs, at [cohen@abhw.org](mailto:cohen@abhw.org).

Sincerely,



Debbie Witchey, MHA  
President and CEO

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<sup>1</sup> National Archives Federal Register, American Foundation of Suicide Prevention, <https://www.federalregister.gov/d/2024-26795/p-46>

<sup>2</sup> National Archives Federal Register, The Crisis Text Line, <https://www.federalregister.gov/d/2024-26795/p-47>