



April 3, 2025

The Honorable Brendan Carr  
Chair  
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 Chair Carr,

The Association for Behavioral Health and Wellness (ABHW) appreciates the opportunity to submit an additional, targeted comment on potential privacy issues involved in georouting text to 988 under the Federal Communications Commission's (FCC) Implementation of the National Suicide Hotline Act of 2018, Third Further Notice of Proposed Rulemaking (FNPR). 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 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, the 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. 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.

### **Privacy and Data Security Standards Need to Adhere to National Best Practices**

ABHW encourages the FCC to protect individual help seekers' privacy by adhering to national best practices concerning data security. The georouting solutions for text messages should only use country-level data, not an individual's precise location. This will minimize user-specific data collection while connecting texters to their nearest 988 Lifeline crisis center. Emergency services should only be contacted when there is an immediate risk to life. Any information gathered should only serve to connect people with ongoing support and save lives.

Thank you for the opportunity to provide additional feedback on privacy concerns with 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,

A handwritten signature in dark ink, appearing to read "Deborah H. Withey". The signature is fluid and cursive, with the first name "Deborah" being more prominent.

Debbie Withey, MHA  
President and CEO