

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

In the matter of)
)
Implementation of National Suicide) **WC Docket No. 18-336**
Hotline Improvement Act of 2018)
)

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net (“VON”) Coalition¹ hereby submits these brief comments in response to the above-referenced *Notice of Proposed Rulemaking*.² VON supports the Commission’s proposal to designate a three-digit dialing code for a national suicide prevention and mental health crisis hotline; furthermore, VON notes that the three-digit code proposed by the FCC can be easily implemented by most VoIP providers.

Since most VoIP providers use 10-digit dialing today, most will be capable of implementing the three-digit code chosen by the FCC within the proposed 18-month timeframe. It is important to note, though, that service providers reliant on legacy switches may not be able to meet such an aggressive timeframe due to 10-digit dialing constraints and switch capability restrictions. In order to avoid consumer confusion, VON therefore supports launching the chosen three-digit code synchronously across all service provider types.

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP communications. For more information, see www.von.org.

² *In the Matter of Implementation of National Suicide Hotline Improvement Act of 2018*, Notice of Proposed Rulemaking, WC Docket No. 18-336, FCC 19-128 (rel. Dec. 16, 2019). These comments are timely filed. *See* 85 Fed. Reg. 2359 (January 15, 2020).

With regard to designating a three-digit code, VON refers the FCC to the comments submitted by the North American Numbering Council's ("NANC") analysis cited in the *Notice of Proposed Rulemaking* regarding the preference of which three-digit code should be selected. As a technical matter, VON would not support repurposing the 611 code. VON agrees with the NANC's analysis regarding the heavy use of 611 today, and the significant implementation challenges that would follow a 611 designation.³ As a result, VON urges the Commission to refrain from designating 611 as the crisis hotline's three-digit dialing code.

VON supports the public policy goals of this proceeding and expects that implementing the chosen three-digit code will be a straightforward process for VoIP providers. As such, VON respectfully requests that the Commission act in accordance with the discussion herein.

Respectfully submitted,

THE VON COALITION

_____/s/
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³ *Id.* at 6-7, para. 13.