

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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

**REPLY COMMENTS OF THE VOICE ON THE NET COALITION**

The Voice on the Net (“VON”) Coalition<sup>1</sup> hereby submits these reply comments in response comments filed concerning the above-captioned *Public Notice*<sup>2</sup> in which the Commission seeks comment on “the feasibility and cost of including an automatic dispatchable location that would be conveyed with a 9-8-8 call” to inform the location identification report required by the National Suicide Hotline Designation Act of 2020.<sup>3</sup> VON agrees with those commenters that emphasize the significant technical and privacy policy issues requiring consideration before dispatchable location information can be provided with 9-8-8 calls.

As noted by several commenters, there are lingering questions regarding whether location information conveyed with 9-8-8 calls will involve the national Lifeline, affiliated local Lifeline crisis centers, and/or local public safety answering points.<sup>4</sup> VON members are working to make

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<sup>1</sup> The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of VoIP. For more information, see [www.von.org](http://www.von.org).

<sup>2</sup> *Wireline Competition Bureau Invites Comment on Costs and Feasibility of Providing Location Information for 988 Calls and Clarifies 988 Implementation Date*, WC Docket No. 18-336, DA 20-1378, Public Notice (Nov. 19, 2020).

<sup>3</sup> National Suicide Hotline Designation Act of 2020, Pub. L. No. 116-172.

<sup>4</sup> See, e.g., Comments of USTelecom – The Broadband Association, WC Docket No. 18-336 (filed Dec. 21, 2020) (“USTelecom Comments”); Comments of CTIA – The Wireless Association, WC Docket No. 18-336 (filed Dec. 21, 2020) (“CTIA Comments”).

the changes necessary to ensure that 9-8-8 callers are routed to the national crisis Lifeline by the July 2022 implementation deadline. With these plans underway, VON agrees with commenters noting that if 9-8-8 calls were instead, for example, routed to local Lifeline crisis centers, new infrastructure, standards, equipment, and other technical and operational development would be needed to facilitate the delivery of location information.<sup>5</sup> In the 9-1-1 context, VoIP providers are working to create the routing infrastructure capable of conveying dispatchable location information. Applying similar measures to 9-8-8 calls, though, is not just a matter of duplicating the existing framework, as new routing and technical capabilities will need to be developed, likely in coordination with the National Lifeline and its local crisis centers.

VON also agrees with commenters that recognize privacy consideration in the Commission’s report to Congress. In particular, commenters correctly highlight the differences in privacy expectations between 9-1-1 and Lifeline callers and how Lifeline callers’ expectation of anonymity may not align with sharing location information.<sup>6</sup> In fact, valid concerns have been raised that sharing such information could deter callers from reaching out to the Lifeline altogether.<sup>7</sup> Moreover, VON agrees with USTelecom’s that Section 222 of the Communications Act may limit voice service providers’ ability to share location information without prior express authorization. The Commission should thoroughly consider the range of privacy issues,

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<sup>5</sup> *See, e.g.*, USTelecom Comments at 3-4. Through advancements in the telecommunications infrastructure and economic models that follow there is no reason to adopt a 1960s/1970s infrastructure model – especially, when a national center, with the right protocols and procedures, could just as easily get the call to local assistance. Moreover, the Commission should be mindful that requiring overly localized infrastructure may result in excessive and duplicative expenditures for equipment and network facilities, undermining the convergence and optimization that has occurred in the telecommunications industry.

<sup>6</sup> *See* USTelecom Comments at 8-9; CTIA Comments at 6-7; Comments of Mitel Cloud Services, Inc., WC Docket No. 18-336 at 3 (filed Dec. 21, 2020) (“Mitel Comments”).

<sup>7</sup> *See, e.g.*, Mitel Comments at 3.

including the potential impact on the policy goals of the Lifeline, in its report to Congress and any proceedings that may follow.

For the reasons detailed above, VON respectfully requests that the Commission consider the discussion herein in developing its final report.

Respectfully submitted,  
THE VON COALITION

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