

# Federal Communications Commission Washington, DC 20554

**December 8, 2025** 

DA 25-1027

## SMALL ENTITY COMPLIANCE GUIDE

Amendment to Part 52 of the Commission's Rules and Georouting Requirements for 988 Text Messages (Implementation of the National Suicide Hotline Act of 2018)

> FCC 25-42 WC Docket No. 18-336 Released July 25, 2025

In accordance with Section 212 of the Small Business Regulatory Enforcement Fairness Act of 1996, this Small Entity Compliance Guide (Guide) is intended to help small entities—small businesses, small organizations (non-profits), and small governmental jurisdictions—comply with the rules adopted in the above-referenced Federal Communications Commission (FCC or Commission) rulemaking dockets. This Guide is not intended to replace or supersede these rules, but to facilitate compliance with the rules. Although we have attempted to cover all parts of the rules that might be especially important to small entities, the coverage may not be exhaustive. This Guide cannot anticipate all situations in which the rules apply. Furthermore, the Commission retains the discretion to adopt case-by-case approaches, where appropriate, that may differ from this Guide. Any decision regarding a particular small entity will be based on the statute and any relevant rules.

In any civil or administrative action against a small entity for a violation of rules, the content of the Guide may be considered as evidence of the reasonableness or appropriateness of proposed fines, penalties or damages. Interested parties are free to file comments regarding this Guide in the above referenced docket and the appropriateness of its application to a particular situation. The Commission will then consider whether the recommendations or interpretations in the Guide are appropriate in that situation. The Commission may decide to revise this Guide without public notice to reflect changes in its approach to implementing a rule, or it may clarify or update the text of the Guide. Please direct comments and recommendations, or requests for further assistance, to the FCC's Consumer Center:

1-888-CALL-FCC (1-888-225-5322)

Videophone: 1-844-4-FCC-ASL (1-844-432-2275)

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#### I. OBJECTIVES OF THE PROCEEDING

In the *Text-to-988 Georouting Fourth Report and Order*,¹ the Federal Communications Commission (Commission) further advanced its long-standing goal of improving access to the critical, life-saving services provided by the 988 Suicide & Crisis Lifeline (988 Lifeline or Lifeline). The 988 Lifeline consists of a national network of over 200 crisis centers that provide 24/7 confidential support to Americans facing mental health, substance use, or suicidal crises.² As originally designed, the 988 Lifeline's system routes text messages to crisis centers based on the area code of the texter's phone, which may not correspond to their physical location. This discrepancy limits the 988 Lifeline's ability to connect texters with essential local community resources, including follow-up care and referral services.

The rules adopted in the *Text-to-988 Georouting Fourth Report and Order* will enable the 988 Lifeline to route text messages to crisis centers based on a texter's general geographic location, while protecting privacy by not identifying the texter's precise location. In adopting rules that parallel the georouting requirements for 988 voice calls, the Commission helps ensure that all Americans in crisis have access to help, regardless of the technology used to contact the 988 Lifeline.

### II. COMPLIANCE REQUIREMENTS

#### A. 988 Text Implementation (47 CFR § 52.201(b))<sup>3</sup>

The *Text-to-988 Georouting Fourth Report and Order* amended section 52.201(b) to read "Commercial Mobile Radio Service" instead of "Commercial Mobile Radio Services." Commercial Mobile Radio Service (CMRS) providers are required, to the extent that they offer Short Message Service (SMS), to allow access by any other covered text provider to the capabilities necessary for transmission of 988 text messages originating on such other covered text providers' application services.

#### B. Georouting Requirements for Covered 988 Text Messages (47 CFR § 52.203(a))

All covered text providers must: (1) develop the capability to transmit georouting data in a format that is compatible with the Lifeline's routing platform, to allow routing of covered 988 text messages by the Lifeline Administrator to the appropriate crisis center based on the geographic area where the handset is located at the time the text message is initiated; and (2) provide such georouting data for covered 988 text messages, when available, to the Lifeline Administrator.

#### C. Definitions (47 CFR §§ 52.201, 52.202, 52.203)

The Commission adopted, or incorporated by reference, several definitions in this proceeding for purposes of the implementation requirements for text-to-988 georouting:

988 text message (47 CFR § 52.201(c)) – A message consisting of text, images, sounds, or
other information that is transmitted to or from a device that is identified as the receiving or

<sup>&</sup>lt;sup>1</sup> *Implementation of the National Suicide Hotline Act of 2018*, WC Docket No. 18-336, Fourth Report and Order, FCC 25-42, 2025 WL 2144646 (July 25, 2025) (*Text-to-988 Georouting Fourth Report and Order*).

<sup>&</sup>lt;sup>2</sup> See 988 Suicide & Crisis Lifeline, Our Network, <a href="https://988lifeline.org/professionals/our-network/">https://988lifeline.org/professionals/our-network/</a> (last visited Aug. 11, 2025); Substance Abuse and Mental Health Services Administration (SAMHSA), 988 Frequently Asked Questions, What is 988?, <a href="https://www.samhsa.gov/mental-health/988/fags">https://www.samhsa.gov/mental-health/988/fags</a> (last visited Aug. 11, 2025).

<sup>&</sup>lt;sup>3</sup> Section 52.201(b) of the Commission's rules was originally adopted in the *Implementation of the National Suicide Hotline Improvement Act of 2018*, WC Docket No. 18-336, Second Report and Order, 36 FCC Rcd 16901, 16919, paras. 30-31 (2021) (*Text-to-988 Second Report and Order*). The *Text-to-988 Georouting Fourth Report and Order* corrects the rule to read "Commercial Mobile Radio Service" instead of "Commercial Mobile Radio Services." *Text-to-988 Georouting Fourth Report and Order* at \*6, para. 20 & n.68 (emphasis added).

transmitting device by means of a 10-digit telephone number, N11 service code, or 988. A 988 text message includes and is not limited to a SMS message and a multimedia message service (MMS) message.

- A 988 text message does not include a real-time, two-way voice or video communication; or a message sent over an IP-enabled messaging service to another user of the same messaging service, except in relation to access to SMS networks for 988 text messages, as discussed above.
- Commercial mobile radio service (CMRS) (47 CFR § 52.202(d)) A mobile service that is: provided for profit (i.e., with the intent of receiving compensation or monetary gain), an interconnected service, and available to the public, or to such classes of eligible users as to be effectively available to a substantial portion of the public; or the functional equivalent of such a mobile service.
- Covered 988 text message (47 CFR § 52.201(c)) A 988 text message in SMS format and any other format that the Wireline Competition Bureau has determined must be supported by covered text providers.
- Covered text provider (47 CFR § 52.201(c)) All CMRS providers as well as all providers of
  interconnected text messaging services that enable consumers to send text messages to and
  receive text messages from all or substantially all text-capable U.S. telephone numbers,
  including through the use of applications downloaded or otherwise installed on mobile
  phones.
- Georouting data (47 CFR § 52.203(b)(3)) Location data generated from cell-based location technology that is aggregated to a level that will not identify the location of the cell site or base station receiving the 988 text message or otherwise identify the precise location of the handset.
- *Lifeline Administrator* (47 CFR § 52.202(d)) The Lifeline Administrator controls the 988 call routing platform pursuant to contract with the Substance Abuse Mental Health Services Administration.
- *Nationwide CMRS provider* (47 CFR § 52.202(d)) A CMRS provider whose service extends to a majority of the population and land area of the United States.
- *Non-nationwide CMRS provider* (47 CFR § 52.202(d)) Any CMRS provider other than a nationwide CMRS provider.

## III. RECORDKEEPING AND REPORTING REQUIREMENTS

The Commission's actions in the *Text-to-988 Georouting Fourth Report and Order* did not create any new recordkeeping or reporting requirements.

#### IV. IMPLEMENTATION DATE

The rules in the *Text-to-988 Georouting Fourth Report and Order* became effective October 16, 2025. Compliance for covered text providers that are nationwide CMRS providers is required by April 16, 2027, and non-nationwide providers must comply by October 16, 2028.

### V. INTERNET LINKS

A copy of the *Text-to-988 Second Report and Order* is available at: <a href="https://docs.fcc.gov/public/attachments/FCC-21-119A1\_Rcd.pdf">https://docs.fcc.gov/public/attachments/FCC-21-119A1\_Rcd.pdf</a>.

A copy of the *Text-to-988 Georouting Fourth Report and Order* is available at: <a href="https://docs.fcc.gov/public/attachments/FCC-25-42A1.pdf">https://docs.fcc.gov/public/attachments/FCC-25-42A1.pdf</a>.

A copy of the Federal Register Summary of the *Text-to-988 Georouting Report and Order* is available at: <a href="https://www.govinfo.gov/content/pkg/FR-2025-09-16/pdf/2025-17895.pdf">https://www.govinfo.gov/content/pkg/FR-2025-09-16/pdf/2025-17895.pdf</a>.