

**North American Numbering Council
Meeting Transcript
Thursday, February 14, 2019 (Final)**

I. Time and Place of Meeting. The North American Numbering Council Meeting (NANC) held a meeting commencing at 3:00 p.m., at the Federal Communications Commission, 445 12th Street, S.W., Room 2-B516, Washington, D.C. 20554.

II. List of Attendees.

Voting Council Members:

- | | |
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| 1. Travis Kavulla | NANC Chairman (R Street Institute) |
| 2. Diane Holland | USTelecom |
| 3. David Greenhaus | 800 Response Information Services, LLC |
| 4. Susan Gately | Ad Hoc Telecommunications Users Cmte |
| 5. Jacquelyne Flemming | AT&T |
| 6. Jacqueline Wohlgemuth | ATIS |
| 7. Greg Rogers | Bandwidth.com |
| 8. Glenn Clepper | Charter Communications |
| 9. Beth Choroser | Comcast Corporation |
| 10. Courtney Neville | Competitive Carriers Association |
| 11. Matthew Gerst | CTIA |
| 12. Carolee Hall | NARUC - ID |
| 13. Honorable Karen Peterson | NARUC – MA |
| 14. Alex Antal | NARUC – MO |
| 15. Honorable Crystal Rhoades | NARUC - NE |
| 16. Barry Hobbins | NASUCA |
| 17. Jerome Candelaria | NCTA |
| 18. Brian Ford | NTCA |
| 19. Pat Phipps | Peerless Network |
| 20. Richard Shockey | SIP Forum |
| 21. Scott Freiermuth (Shaunna Forshee) | Sprint |
| 22. Paul Nejedlo | TDS Telecommunications |
| 23. David Casem | Telnyx |
| 24. Bridget Alexander White | USConnect |
| 25. Dana Crandall | Verizon |
| 26. Darren Krebs | Vonage |
| 27. Robert McCausland | West Telecom Services |
| 28. Professor Henning Schulzrinne | |

Special Members (Non-voting):

- | | |
|-------------------|-----------|
| 1. Glenn Reynolds | iconectiv |
| 2. Ann Berkowitz | Somos |

Commission Employees:

Marilyn Jones, Designated Federal Officer (DFO)
Michelle Sclater, Alternate DFO
Carmell Weathers, Special Assistant to the DFO, CPD, WCB
Kris Monteith, Chief, Wireline Competition Bureau (WCB)
Pam Arluk, Chief, Competition Policy Division
Ann Stevens, Deputy Chief, Competition Policy Division (CPD), WCB
Myrva Charles, Contracting Officer Representative, CPD, WCB
Celia Lewis, Attorney-Advisor, CPD, WCB
Darlene Bidy, Management Analyst, CPD, WCB

III. Estimate of Public Attendance. Approximately 10 members of the public attended the meeting as observers.

IV. Documents Introduced.

- (1) Agenda
- (2) NANC Meeting Transcript – December 4, 2018
- (3) Letter From Paul Kjellander, Numbering Administration Oversight Working Group Chair to Commissioner Travis Kavulla, Chairman North American Numbering Council dated February 1, 2019
- (4) Draft Report and Recommendation on the Feasibility of Establishing a 3-Digit Dialing Code for a National Suicide Prevention and Mental Health Crisis Hotline System dated February 1, 2019
- (5) Number Administration Oversight Working Group Report to the NANC on Feasibility of Establishing a 3-Digit Code for a National Suicide Prevention and Mental Health Crisis Hotline System dated February 14, 2019

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VI. Summary of the Meeting.

Welcoming Remarks/Announcements & Recent News/

Approval of Transcript

Travis Kavulla: We'll call this meeting of the North American Numbering Council to order. This is not one of our typical quarterly meetings but a special meeting once a way [sounds like] due to the government shutdown to consider the recommendation of the Numbering Administration Oversight Working Group relative to the feasibility of establishing a three-digit code for a national suicide prevention and mental health crisis hotline system. We will, however, take the approval of the minutes of the previous meeting if there is a motion to approve them now.

Female Voice: So moved.

Travis Kavulla: It's been moved. Is there a second?

Male Voice: There's a second.

Travis Kavulla: Okay, the adoption of the minutes has been moved and seconded. Is there any discussion or corrections that need to be made? I hear none. So, all in favor of approving those minutes please say aye.

Male and Female Voices: Aye.

Travis Kavulla: Are there any opposed? That motion carries unanimously. No announcements for this meeting other than

perhaps the fact that obviously I'm still here despite taking a new role at the R Street Institute and working mainly on energy policy to ensure some continuity through the rest of the chartered period of the NANC. I've agreed to remain as the chairman. So that will bring us through the September 2019 deadline, and that means that I've got a lot to learn about the various issues that have been referred to the NANC that I thought I might slide by. But I look forward to doing so and working with that. And should you ever need any help with any of the referrals the committees have been given or anything else that requires my attention really for any reason, just feel free to reach out to me. For those here in the room, I brought some business cards that I can give you before we adjourn.

So let's go to Marilyn. We should have done this before perhaps, but Marilyn will - since we're telephonically convened - she'll call the roll just so we have an official record of who is present today.

Marilyn Jones: Thank you, Chairman. So NANC vice chair, Diane Holland?

Diane Holland: Yes, I'm here. Hi.

Marilyn Jones: Thank you. 800 Response, David Greenhaus? Ad Hoc Telecommunications?

Susan Gately: Here, Susan Gately.

Marilyn Jones: ATIS?

Jacqueline Wohlgemuth: Present.

Marilyn Jones: Bandwidth.com?

Greg Rogers: Greg Rogers is here.

Marilyn Jones: Thank you, Greg. Charter Communications?

Glen Clepper: Glen Clepper is here.

Marilyn Jones: Thank you, Glen. CTIA?

Matthew Gerst: This is Matt Gerst.

Marilyn Jones: Thank you, Matt. Fatbeam? Gregory Green,
Fatbeam? NARUC Missouri?

Alex Antal: This is Alex Antal, calling on behalf of
Commissioner Rupp of Missouri.

Marilyn Jones: Thank you. Can you email your name to Carmell
Weathers for me please?

Alex Antal: Yes, ma'am.

Marilyn Jones: Thank you. NASUCA?

Barry Hobbins: Barry Hobbins for NASUCA.

Marilyn Jones: Thank you, Barry.

Barry Hobbins: Thank you very much.

Marilyn Jones: CCTA?

Jerome Candelaria: This is Jerome Candelaria.

Marilyn Jones: Thank you, Jerome. NTCA?

Brian Ford: It's Brian Ford here.

Marilyn Jones: Thank you, Brian. Peerless Network?

Pat Phipps: Hi. This is Pat Phipps sitting in for Julie Oost today.

Marilyn Jones: Okay, thank you. Professor Schulzrinne?

Henning Schulzrinne: Present.

Marilyn Jones: Thank you. SIP Forum?

Richard Shockey: Rich Shockey here.

Marilyn Jones: Thank you, Richard. Somos?

Ann Berkowitz: Ann Berkowitz.

Marilyn Jones: Thank you, Ann. Sprint?

Shaunna Forshee: Shaunna Forshee

Male Voice: [Cross-talking]

Marilyn Jones: Thank you. TDS?

Paul Nejedlo: Paul Nejedlo.

Marilyn Jones: Telnyx?

Sarah Halko: Hi, it's Sarah Halko filling in for David Casem.

Marilyn Jones: Thank you, Sarah. USConnect?

Bridget Alexander White: Hi, Marilyn, Bridget White here.

Marilyn Jones: Thank you, Brenda. Bridget.

Bridget Alexander White: It's Bridget. Thank you.

Marilyn Jones: Verizon? Dana Crandall, Verizon?

Dana Crandall: Dana Crandall. I'm here, sorry.

Marilyn Jones: Sure. Vonage? That concludes the roll call.

Thanks, everyone.

Overview, Discussion, and Approval of Numbering Administration
Oversight Working Group Report on the Feasibility of
Establishing a Dialing Code for a National Suicide Prevention
and Mental Health Crisis Hotline System

Travis Kavulla: Thank you, Marilyn. We'll now turn to our first and really only item for the day - that's Carolee Hall of the Idaho Public Utilities Commission and her report of the NAOWG's work on a three-digit code for a national suicide prevention and mental health crisis hotline system. After she presents, I intend to open for questions of NANC members and then realizing that we have members of the public here who likely want to comment on this item, I'll invite members of the public to do so. After which, we'll have our deliberation on this topic. So, Carolee.

Carolee Hall: Thank you, Chairman. On behalf of Commissioner Kjellander - he is between Washington, D.C. and Boise, Idaho right now traveling home - I will present. It's just going to be a brief overview and then we can talk about it as determined then.

On November 8, 2018, the NANC through the NAOWG was directed by the FCC to prepare a report to assist the commission in completing its directive under the National Suicide Hotline Improvement Act of 2018. To carry out the commission's obligations under the act, the commission directed the NANC

through NAOWG to consider the feasibility of using each of the currently designated three-digit dialing codes to be used for the national suicide prevention and mental health crisis hotline system, including codes the commission has established for other purposes.

To consider the feasibility of using a new, easy to remember three-digit dialing code for such a system including, for example, digits preceded by a star or a number sign.

Outline the logistics of using the currently designated or newly designated three-digit dialing code, including but not limited to the need for translation changes in the network and cell site analysis and reprogramming by wireless carriers.

Estimate the costs associated with using a currently designated or newly designated dialing code, including costs incurred by service providers to carry out the above logistics and any cost the federal government, states, and localities may incur to implement the dialing code.

Recommend whether the commission should designate a three-digit dialing code for a national suicide prevention and mental health crisis hotline system, and if so, what three-digit code it should designate.

Provide a proposed cost-benefit analysis comparing use of a three-digit dialing code and the current use of a toll-free number to operate the National Suicide Prevention Lifeline, and

provide any additional recommendations on the topic to the commission with its report.

The NAOWG held 18 meetings and discussions averaging two-and-a-half hours in length. The PowerPoint presentation that is before you has been distributed and contains five assumptions that we took under consideration. All eight N11 codes were analyzed and the report highlights in detail the common attributes of the N11 codes and the advantages and disadvantages of repurposing or expanding the use of each specific N11 code. A new non-N11 three-digit code was analyzed and the advantages and disadvantages of such establishment are documented within the report. A new non-N11 three-digit code using the number sign or star was analyzed and the issues surrounding those are documented within the report.

Although general types of tasks are similar among all types of service providers - LEC, cellular, voice - each type of service provider has its own difficulties and cost to implement the expansion and/or repurposing of any existing N11 code. The NAOWG does not support use of a new three-digit dialing code at this time due to the significant network and other operational changes that would be needed to establish such a code and the absence of information indicating that such an approach will be more effective than, for example, improving awareness and

usability of the existing Suicide Prevention and Mental Health Crisis hotline.

The NAOWG does not support repurposing any N11 code, particularly 911 and 611 codes. All remaining N11 codes are in use and are likely similarly well-known by the general public. The NAOWG notes that continued use of the existing 10-digit toll-free numbers is the least impactful to service providers for implementation and there is no indication that there are issues with routing calls to these toll-free numbers. Perhaps greater public awareness of the existing toll-free numbers is needed.

Regardless of what the FCC decides, the NAOWG advises that the NANC recommend that the FCC issue a request for comments on this report before providing it to Congress or a notice of proposed rulemaking before issuing any final order identifying and implementing any three-digit dialing code, N11 or otherwise.

I would like to personally thank all who participated on the working group, especially Dana Crandall who kept this on track and contributed with the write-up and did a fabulous job. The NAOWG also asks that editorial privileges be granted with the NANC approval. The NAOWG now respectfully submits the completed report and asks for NANC approval and submission to the FCC as soon as possible given the original February 2019 deadline. And with that, I'll turn it back to you, Chairman.

Travis Kavulla: Thank you, Carolee. Are there any questions? Well, first I'll ask for questions in the room of NANC members and then questions from the phone. Are there any questions?

Matthew Gerst: Hi, it's Matt at CTIA. Sorry.

Travis Kavulla: We'll go to the phone, Matt. I believe I heard you. CTIA, go ahead.

Matthew Gerst: Yes. Thank you. Sorry, this is just one small nit I've noticed out of concern of the report. But in footnote 49 with reference to CTIA, it says "Everything wireless TM." We could just delete that piece of the footnote. That's my only comment, thank you.

Diane Holland: Travis, this is Diane. I have a question.

Travis Kavulla: Go ahead, Diane.

Diane Holland: Yes. Hi. I was just wondering if you could describe the extent, and if relevant, the substance of the interaction and conversations you had with SAMHSA and the VA.

Carolee Hall: We've had no contact with them.

Diane Holland: Okay. I guess you just referred to the reports then?

Carolee Hall: The NAOWG did their report based on what the public notice was to us from the NANC. And each of those groups are preparing their own report as well. Then they go to the FCC so the FCC can combine and do whatever they deem necessary for a final report.

Diane Holland: Yeah, and sorry for not to be clear. I just realized that the FCC was also directed in the act to coordinate with those two. It was more of a question to whether there was any coordination or sort of official or unofficial input by those groups.

Carolee Hall: I believe that's coming.

Diane Holland: Got it. Thank you.

Carolee Hall: Okay.

Diane Holland: Sure.

Travis Kavulla: Others on the phone?

Richard Shockey: Mr. Chairman, this is Rich Shockey. I have a question for clarification. It's still not clear to me why repurposing 611 was rejected.

Carolee Hall: Thanks, Rich. 611 was probably one of the most used N11 codes that we did. We did a small sampling of all the N11 codes and 611 was the most utilized out there.

Richard Shockey: Okay.

Travis Kavulla: Other? Yeah. Go ahead.

Henning Schulzrinne: I have a question.

Travis Kavulla: Just identify yourself by name and ask your question.

Henning Schulzrinne: Henning Schulzrinne. I have a question on the number sign section. In particular, I don't know a whole lot about how that came to be, but I have observed driving

across the interstates that there's a fair number of advertisements for I think it's usually number something blah, blah, blah, a three-digit code after that. That seems to be used to report like dangerous drivers and other such, I mean, non-911 type of issues in that. That seems like a related use of that. I see no mention of that particular use in the report.

Robert McCausland: Carolee, this is Bob, may I comment?

Carolee Hall: Yes, please. Thank you, Bob.

Robert McCausland: Henning, we had discussed that very issue at one point. We had observed that almost in all instances, those applications like that to which you cite are targeting mobile phones that have different capabilities. When we looked at the use of the star or the pound, we found in traditional voice networks, particularly the older technology, the TDM, there were some potential difficulties in implementing. In addition to the fact that today, for example, *69 exists in some areas but the capability as I recall isn't available everywhere on every type of network. So it was based on my recollection largely due to some of those limitations or concerns about those kinds of limitations that we concluded that wouldn't probably be an optimal solution here.

Henning Schulzrinne: Was this tested or is this a hunch based on kind of just a notion on that? I mean, were specific switch

configurations looked at or this is to say a general notion that it may cause difficulties?

Robert McCausland: Henning, within West for whom I work, we had some dialogue among the technical experts who have familiarity with the various traditional switch types. They had informed me of that conclusion. I think that that was consistent with what Phil had found on the Numbering Administration Oversight Working Group during some of our discussions. Is Phil on the line with us?

Philip Linse: Yes, this is Phil with CenturyLink. I'm on. And you're correct, yes. That's consistent with other indications within the network.

Travis Kavulla: Crystal.

Crystal Rhoades: Yes, so I'm curious about why there's no support for repurposing 911 or including suicide prevention, mental health prevention as part of that particular group. I mean, suicide does after all result in death. It is a life-threatening emergency. Can someone help me understand why it would not be an appropriate use of 911 for someone in acute mental distress to use that function?

Robert McCausland: Carolee, do you mind if I comment again?

Carolee Hall: Go ahead.

Robert McCausland: We had on the NAOWC discussed it extensively the potential to repurpose. And repurpose means, to us, to

eliminate the existing use of that N11 and to utilize it exclusively for crisis calling and assistance. We had concluded, and other members of the NAOWC may feel free to interject, that that just didn't makes sense for any of the N11 codes today to drop the existing use because we didn't find any of the existing N11 codes that was slightly used.

Then another part of the evaluation was tied to the relationship between the N11 codes used today and crisis calling. In earnest, we only found that two of the N11 codes, 911 and 211, had some potential relationship to crisis calling. For example, of course, 911 today receives some calls from people in crisis, including suicide callers. In those instances, they tend to transfer in many instances I understand the crisis callers to professional counselors, whether via hotline or some other application.

Evelyn Bailey from NASNA, the National Association of 911 Service Providers I believe - I might be wrong on the acronym - she had put on the record that -- and by the way, NASNA represents many of the PSAPs. They have put on the record, as you may have read in their comments prior, that they recommend that a person who's actively committing suicide should call 911. In our evaluation of 911, we found some characteristics that are very useful for crisis calling. For instance, 911 obviously provides location information. 911 has the benefit of having

Kari's Law access from multiline facilities like hotels or office places without having to dial 9 or something first. 911 has the ability to dispatch immediately in the event that the crisis caller is threatening to injure other people.

So there's certain advantages, but again the conclusion was not to repurpose as part of this recommendation, set of recommendations. Rather, to consider or to encourage the commission to consider -- I guess I should say, to encourage the commission to consider expanding use of 911 conditionally if the existing services bureaus like the PSAPs can accept that - if they have sufficient funding, if they have sufficient training, if they have sufficient capacity to handle the additional volume of calls that may be generated by crisis calling.

And keep in mind that we on the Numbering Administration Oversight Working Group, we didn't have access to a lot of historical information or credible projections going forward. So we don't have a strong sense for the ongoing demand of crisis type applications. The point there is there's a still a lot of questions that we believe need to be examined.

Now 211, before I conclude here, as I mentioned, was the other N11 code that had some relationship already to crisis calling. 211 doesn't operate universally as I recall and others on the line are more familiar with it than I. United Way uses it in some markets and in some markets I don't even believe that it's

used at all. But they do handle in some areas crisis calling to 211. It doesn't have some of the advantages of 911, like it doesn't necessarily have location information; it doesn't have the applicability of Kari's Law and that kind of thing. Does that help?

Crystal Rhoades: It does. I appreciate how hard you all worked on this. As somebody who unfortunately had the experience of being touched very closely by [inaudible], I have a lot of reservation about this idea that it would be inappropriate to reassign a number from a quicker-to-access customer service line via cell phone than it would be a crisis response line to save people's lives. It just doesn't sit well with me.

While I certainly understand the limitations of the PSAPs, the recommendation that they would not expand their services to be responsive to people who are actively in crisis - if you are calling someone to ask for help, you are in imminent danger. Transferring them to another line where that call may be dropped or lost and we have a lot of studies from a lot of jurisdictions including several in Nebraska that tell us that the more of that you do, the more likely you are to lose those. So just by virtue of, you know, numbers get mixed up, the call gets dropped, things happen.

And I think that you have rightly pointed to the fact that if someone is in a crisis like that, in imminent danger, whether

harm to themselves or to others, being able to find them sure seems like it would be an important component. I just think we need to really be thoughtful about that. Sometimes, protecting human life is more important than financial constraints or convenience.

Travis Kavulla: Are there other questions on the phone or in the room? Just as a reminder --

Female Voice: Yes.

Travis Kavulla: One moment. We'll take more questions and then we'll have an opportunity for public comments and then we can come back and if we need to ask further questions and deliberate before taking a vote. I heard one person on the line.

Catherine: Yes, thank you. My name is Catherine [phonetic]. I did have a question regarding the slide deck.

Travis Kavulla: Who are you with Catherine?

Catherine: I'm sorry?

Travis Kavulla: Who are you with Catherine?

Catherine: I am with the AIRS, the Alliance of Information and Referral Systems.

Travis Kavulla: Catherine, if I may, I apologize for not being clear about this. Right now, I'm just asking for questions by members of the council. And then under public comments, if you have a question you want to pose, I'll let you do that or a

comment for that matter. But for now, let me just confine the questions to members of the council, okay?

Catherine: Thank you, I was not clear on that.

Travis Kavulla: Of course, that's quite okay. And you said your name is Catherine?

Catherine: Yes.

Travis Kavulla: Okay, I'll call on you first for public comments when the time comes, okay?

Catherine: All right. Thank you.

Travis Kavulla: Are there other questions on the phone or in the room? I think I have only one, which is, so I appreciate that the report is giving the percentages on utilization, on relative utilization of the three-digit numbers. I have to say I'm completely mystified by the 611 data because that was the one I didn't even know existed coming into this process. I'm shocked that it's more utilized than 511, which I've actually used before, albeit before I had like a phone with unlimited data. Apart from the percentages, what kind of gross numbers are we seeing in terms of people calling these services in that 60-day window? Like 10,000? 100,000? Million?

Carolee Hall: Let me pull a number for you.

Dana Crandall: Carolee, it's Dana Crandall, if I can help?

Carolee Hall: Yes please, thank you.

Dana Crandall: The 66 percent, the gross volume was a 60-day window and it represents tens of millions of calls. The group was hesitant to put in a real number, if you will, which is why we chose tens of millions so you could potentially extrapolate that to an annual figure if you chose.

Travis Kavulla: Tens of millions within the 60-day window?

Dana Crandall: Correct.

Travis Kavulla: I mean, there's 300 million people thereabouts, and my numbers are probably dated in the United States. Are people just calling this number for kicks? Isn't this number for telephone problems or outages?

Robert McCausland: This is Bob McCausland. It's used commonly for repair service, customer service. I frankly use it fairly often. I used it myself two-and-a-half or three weeks ago.

Travis Kavulla: Okay. You learn something new everyday. All right, any other questions in the room or on the phone?

Susan Gately: This is Susan Gately. I just had one more question to that same point, making sure I'm understanding. Did the sample contain tens of millions of calls or is it that there were tens of millions of 611 calls?

Travis Kavulla: Maybe if we could just get a little bit more clarity on the chart that appears on page 19 before we submit this final report. I realized this is confidentiality protected data although it's aggregated and I don't really know what would

be sort of a trade secret about it. It just seems wrong to me that there would be tens of millions of 611 calls in a 60-day window. But I'm willing to be -- I guess I am wrong but maybe it would be helpful to spell that out in the report with a little more clarity, just so we convey the magnitude of the call data. Any other questions? Yes.

Karen Charles Peterson: Mr. Chair, I'm Karen from Massachusetts. By the way, I don't think I was called.

Travis Kavulla: Members, I apologize. I'm sending around a sign-in sheet for the members who are here.

Karen Charles Peterson: So I would suggest that, and I hate making this suggestion but we maybe table them until we have the facts verified. I feel like I don't feel comfortable voting on some things that it seems like the information is a little wishy-washy.

Travis Kavulla: Does someone want to address the data, maybe take one more run at it?

Philip Linse: This is Phil Linse with CenturyLink and I'm not on the council but I was part of the group that kind of put the report together. The overall number wasn't obscured from a proprietary perspective as much as it was obscured for the relevancy of the small sample. I think we also indicate in the report that an overall industry review or perspective from an overall industry dialing of those numbers should be looked at

because our sample was not at all representative of the industry at all. So we put it as, this is kind of a non-statistically relevant sample that gives you kind of a perspective of maybe what you might expect if you were to take an overall industry survey. But we do not want any decisions to really be made upon those percentages. We think that the overall industry should be providing that information in order to take, if you're going to rely on that data, to take that into consideration.

Beth Choroser: I just want to say that --

Travis Kavulla: Just say your name so we can --

Beth Choroser: Sorry, Beth Choroser from Comcast. I just want to say that if NCTA has filed the next survey [sounds like] that had a two-month figure for the big margin cable companies that was a little over half a million already. Sorry, over 500,000 [inaudible].

Travis Kavulla: Over what period?

Beth Choroser: Over a two-month period, October and November of 2018.

Carolee Hall: That was what, multiple carriers?

Beth Choroser: That was for the three largest cable providers [cross-talking] in the public [inaudible].

Travis Kavulla: And that's half a million for all of the three codes?

Beth Choroser: For the sort of the 611.

Travis Kavulla: Just the 611.

Beth Choroser: Just 611. They provided aggregate numbers for 211, 311, 511, and 611.

Travis Kavulla: Yes, Commissioner Rhoades.

Crystal Rhoades: Are we certain that they didn't aggregate all of their customer service calls as 611? It just seems awfully high.

Beth Choroser: Yeah. Those numbers are not difficult [sounds like]. And again we're talking about three cable companies. This is pretty [indiscernible/audio glitch] so I think it goes to the point of when you repurpose the number, how long is it going to take to educate people not to call that number and what is the impact on the crisis line?

Travis Kavulla: Other questions?

Henning Schulzrinne: This is a question - Henning Schulzrinne - that I have. I don't know if you've even discussed that but it's a theme throughout that one of the difficulties of changing numbers, leaving aside their current use is that consumer education would take a long time. So I wonder if there's been any precedent that any of the members are aware of where a number that was previously used for one purpose even if it was no longer available because let's say, it switched to an 800 number or it was converted to some other use. It would be nice if we had some quantitative evidence whether this is a minus 6-

month problem or a minus 60-year problem, so to say, as in people will never learn in that.

Philip Linse: This is Phil Linse again. I think we don't directly address that but we do indirectly from the perspective of, I think we provided an example of a code that was decommissioned or returned or is no longer being used for the purpose it was previously assigned for or allocated for which is 456. And the industry numbering committee had basically put that into a hold position where it could not be reassigned. I think the aging on that is for about five years. And that is actually a code that was used by service providers not necessarily assigned to end users. It was determined that that would necessitate a five-year aging. If you kind of play that out to the extent that you are now repurposing a number that was used for an alternate purpose that is used frequently by the public, I would think that it would be an even longer aging period that you would consider.

With that, I mean if you look at the report, we do put a ranking and I would suggest potentially modifying and actually putting numbers around that ranking from most to least kind of thing. That we do identify a unique three-digit code that has not been assigned as preferential over the repurposing of an N11 code. It's for those kinds of reasons that that ranking has been established the way it has.

Robert McCausland: Mr. Chairman, this is Bob at West. Just to add to Phil's point, footnote 60 refers to that 456 code reference that Phil made. There's some additional information here at footnote 60.

Public Comments and Participation

Travis Kavulla: Thank you. Other questions? Okay, let's turn to public comment. We'll go first to Catherine on the phone and then we'll go to people in the room. So Catherine, go ahead and ask your question or make your comment. We're going to adhere to a time limit of five minutes per speaker on public participation.

Catherine: Thank you Mr. Chairman. I greatly appreciate it. I just have a question regarding the PowerPoint on slide deck page number 10. Of the 14 listed contributors, it said that the 18 leading in participation was an average of 12 attendees per meeting. Of the 14 that are listed as contributors, only two were state utility commissioned and 12 of the 14 contributors basically represent the telecoms. I have several questions regarding this, is there a complete listing of the workgroup participants available?

Travis Kavulla: Carolee?

Carolee Hall: Yeah. I could probably make that available. Let me address your concern about the state representation. I work for the Idaho Commission and the Colorado Commission staff

person was also very involved in this process. As far as CenturyLink, AT&T, West, and Verizon, it was very balanced. Are you looking for specific people?

Catherine: Well, I guess at least my next question because I have to assume that the 12 that are listed of the 14 participants or contributors, I wondered if the 911s are represented on the workgroup, or 211 or 511 or United Way Worldwide.

Robert McCausland: Carolee, may I? This is Bob.

Carolee Hall: Yeah, Bob, please.

Robert McCausland: Okay, this is Bob McCausland at West. West Corporation is a conglomerate. I work for the telecom services unit, and have, a 911 colleague. I have a counterpart within West Safety which was formerly known as Intrado Communications. I helped to write, to a very large extent, the 911 part of the recommendations. I used input from my 911 colleagues within West Safety Services and they introduced me to people like one person I mentioned earlier today, Evelyn Bailey at NASNA, the National Association of State 911 Administrators, I think is the correct wording for that acronym. And so in that context we did have some input provided to us through my questioning of my colleagues and of Evelyn Bailey.

As I also mentioned earlier Evelyn Bailey at NASNA had filed comments referring to, for example their recommendation that

individuals actively involved in committing suicide should call 911. So to that extent, we did receive input and provided consideration. Also please keep in mind that our set of recommendations included suggestions to the commission to seek further input from individuals who have an interest including of course those in the 911 field.

Catherine: Thank you. I appreciate that. My concern was that it's just the makeup of the workgroup contributors in very heavily made up to the telecoms that utilize 611 services.

Carolee Hall: This is Carolee, if I may. We also took into account United Way comments that were filed and a number of other comments that were filed. So we examined all of the avenues as much as possible.

Philip Linse: This is Phil with CenturyLink. In addition to that, from the perspective of the NANC, we were very conscious of those what we called platform providers, the PSAPs and United Way, you know, those platform providers. We didn't want to encroach on the perspective of those platform providers but cared for them and that we wanted to make sure that they were considered as, if we move in these different directions, there could be additional burdens placed on these platform providers and they would need to definitely weigh in on those kinds of issues. So we're really cautious about the kind of the position

that NANC and the providers and stakeholders of NANC really provide as far as their perspective.

Catherine: Thank you.

Travis Kavulla: All right. Let's go to the room with public comment. If you want to give public comment, can I just have a show of hands to see how many would like to give it today?

Three, okay. We'll start with -- go ahead, Joe. And why don't you get up and be seated in that chair just for call quality?

Joe Hurlbert: My name is Joe Hurlbert I'm from the Department of Veterans Affairs. I would like to address some of the comments that were in the room. One, as far as 911, remember that suicide prevention also includes crisis. But if suicide prevention works well we can get those people into therapy before they reach crisis. And 911 being able to handle that interaction is just not realistic. Some of those calls are very time-consuming and to tie up a 911 [inaudible] is just not appropriate. If you look to the comments, like the comments from the United Way, they're all essentially, essentially one comment. In fact one of the postscripts [sounds like] on that I believe refers to the boilerplate that they're all working on to that extent I'm sure.

But there's also a lot of comments that were not -- there was only a couple of reference in the report but there's an awful lot comments from non-health professionals that get into the

game after the crisis is over and when it's just for long-term care. Their stake in it being as, again, after intervention. Without any exception, all are non-health professionals. I didn't find any exception. We're saying that a dedicated number, not a shared number like 911 or 211 was the only reasonable conclusion. Also they were saying that a three-digit number would save lives. This is really a big thing for them. When I had my first meeting with the non-health folks from the Veterans Crisis Line and the National Suicide Prevention Line, that's when I picked up the drive because they were just -- did or like affect the process of [inaudible].

As far as the usage data, the usage data doesn't factor in the fact that the 211, well, 411 was kind of a little different, [indiscernible] 211, 511 and [inaudible] better to look at as far as the purpose. 511, we never expected to handle a call line, a large call line. Its purpose is not going to be to have everybody available going there [indiscernible]. 611 probably has a lot of repeat callers. Callers who have to call back a couple of minutes later because they tried something and it worked or it didn't work. And so the data that I'm going from, call volume is not a valid way to determine the value of that given 911.

Also, as far as being able to get and do analysis about change, 611 is unique. When we started out as a public service provider

years and years ago, it was the only server. It has not failed. As it evolved now, it's failed to answer which is contrary to the original concept of a three digit N11.

But also as that evolved and as the competition increased within the telecom market, it's no longer advertised as a public service provider. We cannot advertise 611 in public because it has to include, if you're calling about your phone that's not working, 611 won't work because it's not working. So look up an 800 number and call an 800 number. If your phone needs to be worked on while you're on the phone, look up an 800 number, call from 800.

There was some comment in the report about most carriers have an 800 number. I kind of believe that all carriers got an 800 number. Just a few a weeks ago, my daughter was coming back from a 6-month [inaudible]. Somehow or another in the process, her phone number was put into a vacation hold rather than a military hold. She lost her -- at three months in, they shut off the account and the number was lost as a matter of fact. She got to my house. I have four different carriers represented in my house, but they're all different carriers and not the one that she had. So 611, you know, I had four different 611 options in my house. None of those worked. It doesn't want to reach her carrier.

And so advertising 611 becomes the responsibility of each individual carrier to their customers. So therefore, when you change your carriers that advertising you've already gotten established, the second of it to do is to reach out to their customers, and you send them bills monthly. You either email or something. There's a lot of e-bills [sounds like] now, but still that communication path is different. It's direct from the carrier to the customer. Then they add to that that -- it was just a little bit in the report because it says that I mentioned three different ones [sounds like] and I do believe that would be enough.

But the reality is that once the process is started, the training [sounds like] idea implementation plan between the two require [sounds like] a year or more just to plan all the details. Yes, they have to head into that, these carriers put their intercept recording on the 611. At that point you'll likely have one year or more of that intercept recording where their customers who have been calling 611 are the repeat ones that have it memorized will be hitting that intercept recording with their personalized 800 number to tell them how to reach the service.

Now also when my daughter did that, I will say this that it took us - and both my daughter and I are very well versed in the web - it took quite a while to find the 800 number on that carrier's

website. Great [indiscernible] they have this 800 number on their homepage. The first thing is I [inaudible]. So anyway, I guess that -- let's see if can [inaudible].

Travis Kavulla: It's okay. Thank you, Joe.

Joe Hurlbert: Okay. I do appreciate everything we've got today.

Travis Kavulla: Thank you and sorry, Commissioner. Okay, we'll go, sir, to you next, if you would like to come up. Here you go. Just introduce yourself by name and who you represent.

Richard McKeon: Yeah. My name is Richard McKeon. I'm the chief of the Suicide Prevention Branch of the Substance Abuse and Mental Health Services Administration. Since SAMHSA was referenced earlier, before I thought it was important for the public record that it'd be acknowledged that SAMHSA is here. SAMHSA supports the National Suicide Prevention Lifeline through a grant. And that grant in turn networks 163 community crisis centers across the country. I'm including a link to the Veterans Crisis Line. So again, the SAMHSA has prepared and filed its report with the FCC just in the last few days according to the deadlines and the National Suicide [inaudible].

Travis Kavulla: Could you spell your last name, just for the record?

Richard McKeon: M-c-K-e-o-n.

Travis Kavulla: Okay. Thank you, Rick. And sir, did you have a comment?

Matt Daneman: Matt Daneman with Communications Daily. I was just hoping we could go back to the second page of the presentation [inaudible].

Travis Kavulla: Oh. Sure. Always, always, we're always happy to accommodate the trade press. Would you like -- here. I'll just give you mine as long as you return it. [Inaudible] we've got any incriminating words in there. The transcript picks up all of this stuff, I suppose.

Okay, so we'll now -- I'm sorry, are there public comments on the phone? All right, then we'll come back to the members of the council for our deliberation now. We have a draft report from the NAOWG before us. Obviously we're already passed the deadline by which it was requested but that's with all due respect not our fault. So I think it's safe now to deliberate and consider what we want to do with this. If anyone would like to lead the discussion or for that matter, make a motion? Not all at once. Bob.

Robert McCausland: Mr. Chairman, this is Bob McCausland at West. I would like to move for the full NANC to accept the recommendations of the Numbering Administration Oversight Working Group, subject to the editorial privilege that Carolee

sought early during this meeting, and subject to clarification of the counts on an N11 basis as we discussed earlier today.

Travis Kavulla: Is there a second?

Female Voice: I second.

Travis Kavulla: Okay, it's been moved and seconded that the draft report be adopted by the NANC subject to editorial clarifications and other revisions associated with further explanation of the table that appears on page 19. Is there any discussion of the motion? Any discussion on the phone?

I guess just for myself, I mean I share some of the concern.

I'm honestly, like it has already been discussed, a little surprised with the 611 data but I have no reason to disbelieve it. I also agree with Joe that -- I appreciate your comments Bob about 911 but it doesn't strike me as realistic to expect that to be a solution to this issue. I mean there's a stigma associated with 911. People don't call it to obtain mental health support. As the people -- I'm not sure what actively committing suicide means but obviously there are times short of that when we're trying to get some kind of solution. But I end up agreeing I guess with the report in the sense that there's a non-repurpose option that can be used if the FCC considers it in the public interest to do so, and realizing that it's not going to have a ubiquitous presence that maybe that's the best way to go.

For our part, I think it's reasonable to send -- you know, this is our report. The FCC is going to get a lot of commentary from other parties that have that representation of the mental health perspective than the regulators job ultimately to kind of weigh those factors and make a determination. I think we all realized that this probably isn't the last word on this. Anyone else?

Susan Gately: This is Susan Gately, if I can. I guess I also am uncomfortable with the recommendation not to repurpose 611 if it's based just on current volume. I don't know what the solution to that is. I mean I don't think we need to go as far as recommending that they repurpose 611 but I don't know why it's specifically called out in the report to not be repurposed.

Travis Kavulla: Let's hold on, professor. We'll go to Commissioner Rhoades.

Crystal Rhoades: I agree. I mean, I don't have any reason to doubt the veracity of the data as it's been presented. What I'm struggling with, frankly, is that suicide is the 10th leading cause of death in this country. And for 15 to 24-year-olds, it is the second leading cause of death. I just cannot reconcile in my mind any recommendation that says customer service trumps a three-digit dialing code that mental health care providers believe would save lives. And so I'm a little concerned not too much about what it is this report is saying but the way in which it is saying it. I don't know that there's been -- I don't feel

that this report, as written, has necessarily sort of a direct back issue. And I also am not certain that there's great clarity whether or not the NANC is actually recommending that a three-digit code is appropriate, just not a repurposed code. It feels very ambiguous and fishy and it feels like we're not being very clear about what our recommendation is.

I think I would feel more comfortable if we were to take a position on, yes, we think a three-digit code is appropriate or not. Whether or not it is a repurposed number or not I think is yet to be perhaps determined and perhaps is not really what we should be weighing it on. But I would feel much more comfortable with it if we had taken a position one way or the other to say that we thought a three-digit code would be appropriate for this particular issue.

Robert McCausland: Mr. Chairman, may I comment again? This is Bob at West. Our initial intent, I think, or at least the intent of many, I believe, members of the Numbering Administration Overstate Working Group was to provide a more clear set of recommendations. But one of the issues that we faced I think was accentuated by the discussion about the demand on each of those N11 codes. We have limited information, historical data and limited information prospectively about call volumes, unit cost, that kind of thing. And without that information, if I were looking at this as I often do from a

business case perspective, building a business case for, say, a new product, it would be very difficult with that level of information that we had access to in this period of time to establish very firm recommendations. So it's like from the early stages all the way through this that we needed more information in order to be able to get to that level that we wanted to.

That ties in to some extent to why we recommended that the commission examine the issue further. In fact, it's directed to in the Act, take further comment, and possibly then refer back to us at the Numbering Administration Oversight Working Group and the NANC additional questions as additional information is made available before the final decision is made by the commission. I hope that helps.

Travis Kavulla: One thing that doesn't really emerge from the report, and I realize this because it's not your recommendation, but let's just say that the commission said that, you know what, we're going to repurpose a three-digit N11 number. So you pass that fork in the road. Which should it be?

It's sort of like the referral we thought with toll-free number modernization where the NANC said, well, we don't really like this idea, FCC. But within the confines of the decision branch tree that you've given to us, we're going to help you out with some recommendations. And I realize, I don't want to ad lib

this, but if that were this [indiscernible], does anyone have thoughts about what the sort of lowest hanging fruit or the best number would be?

Rich Shockey: Mr. Chairman, this is Rich Shockey. I'll take that on.

Travis Kavulla: I knew Rich would have an opinion at some point in this meeting. Rich.

Rich Shockey: I'm noted for at least having an opinion about something. There's an upside and a downside to all of this one way or the other. And if the commission decided to repurpose, I think a problem they would run into is this idea of a transition period, that five years might actually not be enough to deal with the sort of marketing, brochures, numbers on bills and stuff like that one way or the other. Would that actually defeat the purpose of an NXX repurposing one way or the other? Given the fact that probably 611 is the most logical one because it doesn't deal with issues of imminent public safety or imminent public information, it's really more of a carrier convenience to that extent.

Certainly, 611 always struck me as being *the* most logical path to go to. However, the report, I think it's an excellent report and there's a lot of options there. This should be studied I think for another six months fairly easily. But realistically, repurposing, like branding in modern commerce, is a very

complicated process. And repurposing a hundred numbers, you know, repurposing telephone numbers, as the NANC is about to confront, is also complicated. So even a transition on disconnected numbers, we're going to have to face that when we sit face-to-face, how long is long enough?

Travis Kavulla: Thank you for that Rich. I think I accept that. Anyone else?

Philip Linse: Yeah, this is Phil Linse with CenturyLink.

[Cross-talking].

Travis Kavulla: Okay. Let's go to Phil and then Professor Schulzrinne.

Philip Linse: To Rich's, to point there, the scope of this document was very much service provider-oriented and we knew that there were other reports out there. I think it's all of that together that needs to be considered when there's a decision made on how to proceed forward. So I think that's important to recognize as far as the scope of the document, the expertise of the people that were asked to provide this recommendation, and then that along with other reports that are out there. Thank you.

Travis Kavulla: And now, Professor.

Henning Schulzrinne: In its current form, I'm afraid I will have to vote against your report. I believe that it over-represents the certainty of the discussion, which I think has been made

clear in the discussion that we've had online. Since we have to provide a report that stands on its own without the context that was provided, I do not think it is ready and reflects the complexity of the issue.

Just to give you one additional example, while the five-year time horizon for 546 was decided, there's no scientific evidence provided that this number is based on -- is comparable and based on anything but an estimate in this and it was never a customer-facing number to begin with. So it is insufficiently grounded, in my opinion.

I do believe that it would have been helpful to indicate, for example, when we push for seeing 611, the largest concern would be - my quick research indicates at least, as much as I can do that in ten minutes - that of the numbers primarily used and advertised for all of the reasons mentioned by one of the commenters, by the wireless phone companies which have clearly have other opportunities like #611 or number 1-611 or something like that on their services, that they can transition now and in an intercept could redirect people who are not calling for mental health support and suicide hotline support to whatever by simply, I mean, press 1 to be connected to customer service type of thing for some duration without interfering with the other purpose that was mentioned. The report does not, as far as I can tell, seriously entertain this type of technical

possibilities during the transition period. And so for that reason, I'm afraid I will have to vote against the report.

Travis Kavulla: Given that, when we call for a vote I'll ask orally for the ayes, and then the nays as well. And then just for the sake of the record, I'll ask for people who are either voting no or abstaining to identify themselves. And then we'll assume without the virtue of a roll call that the remaining people voted aye.

Henning, do you contemplate writing a kind of - as you sometimes have - like a minority report? [Cross-talking] Listen, I'm not burdening you with a homework assignment. That would be probably an improper reversal of roles. I'm just wondering, if you want to, obviously you can, but your vote will be reflected in the transcript is what I'm saying.

Henning Schulzrinne: I don't want to commit to things that I don't want to hold up. If the outcome of that, if the majority wants to vote in favor of that until my minority, so to say, opinion is finished which truly I can't [sounds like] do this afternoon, so with that let me ask a procedural question. Would that then delay the report? And if so, what is the timeline when all of this should be done by?

Travis Kavulla: Well, they said it's already past due.

Marilyn, if we got this in on Tuesday picking a number almost a day almost at random, would that be okay?

Marilyn Jones: Yes, that would be okay.

Travis Kavulla: All right. Henning, if you had until Monday close of business to get a minority statement to me, what would you say to that?

Henning Schulzrinne: I will regret this but I will say yes.

Travis Kavulla: All right. Any other discussion?

Susan Gately: Susan Gately for Ad Hoc one more time.

Travis Kavulla: I should have done that, Susan.

Susan Gately: You know, I still am very troubled by calling out 211. But it's a wonderful report, I mean, I read through it. There's so much good information in it and I got to the end of it and I really didn't see why -- I mean, I thought there were actually reasonable reasons not to use all of the N11 codes that were mentioned. And I just don't know why we're calling out 211. Can that be changed in the report? Can it just live with the -- under the recommendation that none of the N11 codes be repurposed? It troubles me and I don't know how we would do that. But --

Philip Linse: This is Phil Linse with CenturyLink. To the extent that it is called out, it is called out to not necessarily be repurposed.

Susan Gately: Right, but if I'm trying to find it on the front page. It's at the front, at the very beginning the report said,

you know, it basically recommends that neither the 911 nor 611 be repurposed, does it not? Maybe I'm thinking of this slide.

Carolee Hall: I know it does say that in the report.

Susan Gately: It does say that? [Cross-talking]

Travis Kavulla: So I'm seeing on page four, which in the executive summary, the very final paragraph of that section begins, "At this time the NANC does not support repurposing any N11 code, particularly the 911 and 611 codes." But I guess I might be missing the 211.

Susan Gately: No, no. That was me misspeaking, I'm sorry. 611. Yeah. Do we need to call that out? Can it not just say the recommendation is to not be repurposing any of them rather than just giving special emphasis to not repurposing 611?

Travis Kavulla: I have to say and I think I -- it's the purpose of the full NANC to deliberate and I don't mean to second guess the hard work of the working group, but I think I agree, especially in light of Rich Shockey and what other people have said, that even though it seems that the high utilization rate, its public purpose is not imminent information or public safety. So, I think we can edit the report in a way and fall short of saying if you're going to repurpose, then use that. But instead you could edit simply saying like clearly repurposing 911 is ridiculous, right? But I think it's up for debate if you are going to repurpose a three-digit code, that

you might well actually find that 611 is the one you would go after. Would that change be acceptable? Would it be acceptable?

Rich Shockey: I agree with you, Mr. Chairman. That is the one code that is not directly associated with a public good.

Travis Kavulla: Is it acceptable for the movement?

Robert McCausland: No.

Travis Kavulla: Bob?

Robert McCausland: He's looking at me and I'm considering how to respond to Chairman Kavulla. Yes, the answer is yes to the move and it is acceptable. So I therefore amend my motion to include a modification to the draft to -- let me think of how best to word this, to not exclude 611 repurposing from consideration.

Travis Kavulla: Susan, thank you. Bob. Susan, does that address your concern?

Susan Gately: Yes, it does.

Travis Kavulla: Is there another [audio glitch]? Then the main motion is amended by agreement of the movement. Is there any other discussion of the motion as amended?

Crystal Rhoades: Help me understand how this materially changes the report. I think I understand it, but I'd like someone just to tell me to make sure as this may very well change how I will vote.

Travis Kavulla: So let me try to explain it, and Bob can take a shot at it or Carolee. So Carolee, since you're not here in person, Bob is being put on the spot. Carolee, if at any moment you want to take the fire you should do so.

Carolee Hall: He's doing a great job.

Travis Kavulla: I think so too. So my impression is that citing to evidence that Henning has criticized as lacking statistical merit, the report says, hey, 611 is highly used by the public and therefore should be given a status while on the executive summary similar to 911, which is to say if the FCC repurposes anything it should definitely leave 911 and 611 alone and focus on the other codes. And the effect of the amendment is simply to say let's not give 611 that status. Let's throw it back in the bucket with the others and just kind of let the report speak for itself. The authors will clarify and add some more detail, perhaps some caveats based on the prior clarification around the data. Henning may -- well, he will play the minority statement about his concerns. But as a result of this most recent amendment, we will not include the 611 carve out essentially.

Crystal Rhoades: Okay, that is what I thought I understood. Just to be clear, it's basically we're not going to highlight the fact that 611 is not currently being used for a public function. That will not be included as part of it. It will

really just be a removal per se. We don't think anything should be repurposed at all and leave it there. Is that a fair assessment?

Travis Kavulla: Yeah, I think that is. The amendment really says -- would leave the text basically saying the NANC doesn't believe any of the N11 numbers should be repurposed, particularly on 911; in other words, to remove 611 from the super duper status that it had previously enjoyed. Just trying to drive to common ground.

Crystal Rhoades: That's a good change. Okay.

Travis Kavulla: All right. I feel as though I'm going to be advised here.

All right, I've been advised by the very able staff of the Wireline Competition Bureau that if we wanted to, we could allow the revisions that we've been discussing to occur, which includes the revision to the table about the data which Henning's objection depends upon, and the amendment as we've discussed have a final, final draft circulated by email. And then table this, the vote on the pending motion as amended to an electronic mode based on the same.

Female Voice: So moved.

Travis Kavulla: Okay, a motion has been made.

Rich Shockey: I'll second that motion.

Travis Kavulla: Okay, a motion to table is a subsidiary motion which is not debatable, so all in favor of the motion please say aye.

Male and Female Voices: Aye.

Travis Kavulla: Thank you. All opposed? The motion carries. We'll work out the logistics of this and I'll have a conversation on the sidelines about when you can expect the revised version. But I think it's safe to say you should expect it early next week. And then, you'll receive an email from Marilyn asking you to vote yes or no by a date certain that will also include -- so, Henning, for the moment your homework assignment is held in abeyance. You get to decide whether you want to write a minority report once you've seen the final. And our process will build in that opportunity with the goal I think for this to be sent in by the end of the week. I said Tuesday but now it's the end of the week since your very helpful suggestion. And that caused this procedural, beneficial procedural move I think. Does that all sound good with everyone?

Henning Schulzrinne: Thank you, yes. [Cross-talking]

OTHER BUSINESS

Travis Kavulla: Then we are on to other business. I'm sorry, are there any other public comments? No. Is there any other business that needs to come before the NANC at this time? Okay,

there's none from me either other than what I just said. Thank you for joining us and I hope you have all a lovely Valentine's Day. We are adjourned.