

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: *Implementation of the National Suicide Hotline Improvement Act of 2018*, WC Docket No. 18-336.

With rising suicide rates and COVID-19 compromising the mental health of so many Americans, this item is especially applicable to the times in which we live, and I applaud the Chairman for advancing the will of Congress in the Suicide Hotline Improvement Act through this proceeding. While I am somewhat skeptical about certain assumptions in the item's analysis of costs and benefits, I am hopeful that our actions today will be effective in preserving sacred human lives.

Because there is so much is at stake, we need to make sure the Commission gets this item right. That includes making sure there aren't misunderstandings over the timeline for rolling out deployment of 988. While I understand the urge to publicize the actions we are taking, doing so shouldn't come at the risk of confusing consumers and vulnerable individuals in need of the service. We can and should celebrate the work that's been done by individuals involved in this effort, including those on Capitol Hill, without giving a false promise to the public that 988 is already operational. So, let's be clear in all our communications that deploying 988 will take time and isn't a matter of simply pulling a proverbial switch.

In fact, it will require providers, particularly legacy wireline companies, to replace, update, or otherwise alter thousands of literal switches, at their own expense, and 87 area codes will need to transition to ten-digit dialing. Even in the best of circumstances, such transitions can be challenging and lengthy, requiring consumer education, end user equipment upgrades by enterprise and government entities, and coordination with state public utility commissions, among other challenges. Acknowledging the work ahead doesn't diminish the extensive work that's been done to arrive at this point; it just reflects the reality of the transition.

Similarly, I am sympathetic to the fact that we are placing a burden on providers to deploy 988, who will face many obstacles that are beyond their control. I very much appreciate that the Chairman's office was willing to work with me to acknowledge and mitigate some of these challenges. For example, holding the North American Numbering Plan Administrator accountable to its obligations and demanding time-sensitive deliverables should help in moving the process along. However, in some cases, transitioning to ten-digit dialing may not be possible within our time frame, and I am grateful that the draft is more sensitive to the job ahead than the one initially circulated.

I also want to acknowledge that, to the extent we decline to establish a cost recovery mechanism for implementation of 988, we are essentially imposing an unfunded mandate on providers. While there absolutely may be good policy reasons for requiring providers to bear the costs of our decision, some of which are outlined in the item, our rhetoric should at least be consistent with our approach in other proceedings. Making providers come up with efficiencies to absorb the costs of 988 deployment, while lecturing Congress about unfunded mandates being imposed elsewhere, seems a little unfair.

In the end, this item has the potential to be a blessing for many and has been rightfully pursued by members of Congress. I hope nationwide 988 deployment will be a smooth process and that our actions today make a difference for those Americans at risk of harming themselves. I will support the item.