

March 22, 2021

The Honorable Jessica Rosenworcel
Acting Chairwoman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Chairwoman Rosenworcel,

We write to you to ask the Federal Communications Commission take all appropriate actions to swiftly expand access to 2-1-1 essential community services calls. Specifically, we ask you take steps to ensure individuals without an active contract with a cell phone carrier will still be able to make 2-1-1 calls, similar to FCC policy regarding 9-1-1 emergency calls. Furthermore, we ask you look into expanding WiFi calling requirements related to 9-1-1 and the 9-8-8 suicide hotline to include WiFi calling to 2-1-1.

Through the ongoing pandemic emergency, there have been widespread increases in the use of 2-1-1 essential community services calls nationwide. In New York State, calls to local 2-1-1 lines have nearly doubled to 500,000 calls fielded in the last year compared to roughly 260,000 calls between January 2019 and January 2020. In Vermont, calls to local 2-1-1 have increased by 50 percent in 2020 compared to the 2019 year-end total¹. The vast majority of calls are inquiries about food pantries from first time users, questions about rent assistance, and requests for timely public health information about the COVID-19 pandemic. As vaccination programs expand nationwide, we expect a similar increase in 2-1-1 calls from individuals seeking critical information about local vaccine access. Moreover, 2-1-1 call centers provide crucial referrals to important mental health resources, including suicide prevention resources for callers in crisis. In 2020 alone, New York State 2-1-1 call centers received 15,126 calls for crisis intervention services, with rates spiking between March and June during the early months of the pandemic.²

The ongoing pandemic emergency has forced many to make deep cuts in their personal expenditures and family budgets. All too often, this may mean cutting back on or entirely cancelling cell phone contracts. Such necessary measures are particularly pernicious because the loss of cell phone access means a loss of ready access to the vital information and referrals provided by 2-1-1 call centers.

Similarly concerning are reports from local 2-1-1 centers across the country that calls over a WiFi connection are not being connected at all. As many individuals transitioned to working from home at the beginning of the COVID-19 pandemic, WiFi calling increased. Some telecommunications carriers, like AT&T, have reported their network's WiFi calling minutes had increased by 75

¹ Vermont data provided by *United Ways of Vermont/Vermont 2-1-1*

² All New York data drawn from *2-1-1 Counts*, a state-by-state data collection and analysis tool for 2-1-1 calls created by the Health Communication Research Laboratory at Washington University in St. Louis.

percent.³ Particularly in many rural states like Vermont, broadband services are available in locations that cell phone service is not, leaving WiFi as the only option to call emergency information and referral service lines such as 2-1-1.

Under Title 47 of the U.S. Code, the FCC regulates 9-1-1 emergency calls through 47 CFR §9. Specifically, 47 CFR § 9.4 (“Obligation to transmit 911 calls”) creates an obligation for all telecommunication carriers to transmit all 9-1-1 calls to relevant local answering points. This obligation extends to guarantee the transmission of 9-1-1 calls from those without an active contract with a telecommunication carrier.

The FCC has taken steps in the past to ensure calls over WiFi to other three-digit emergency service numbers are connected. Through rulemaking in PS Docket No. 07-114, the FCC set a timeline for telecommunications carriers to connect calls to 9-1-1 over WiFi with accurate location data. Additionally, in compliance with the National Suicide Hotline Prevention Act of 2018, the FCC drafted PS Docket No. 18-336 requiring all telecommunications carriers to make necessary technological changes or upgrades to connect callers to the 9-8-8 suicide prevention hotline.

Given the unprecedented pandemic emergency we currently face and the clear need for stable access to essential information and referrals provided by 2-1-1 services, we ask you take all appropriate steps to institute a similar obligation for all telecommunication carriers to transmit 2-1-1 calls to a local point of access and to connect calls over WiFi. Doing so will ensure those who lose cell phone access do not also lose access to this crucial lifeline.

Sincerely,



Kirsten Gillibrand
United States Senator



Bernard Sanders
United States Senator



Robert P. Casey, Jr.
United States Senator

³ <https://www.oecd.org/coronavirus/policy-responses/keeping-the-internet-up-and-running-in-times-of-crisis-4017c4c9/>