July 3, 2025

FCC FACT SHEET[*]
Implementation of the National Suicide Hotline Act of 2018
Fourth Report and Order – WC Docket No. 18-336

Background: This *Fourth Report and Order*, if adopted, would take an important step in the Commission's efforts to enhance access to the life-saving services provided by the 988 Suicide & Crisis Lifeline (988 Lifeline or Lifeline) by improving the routing of 988 text messages. The 988 Lifeline provides critical support to Americans facing mental health, substance use, or suicidal crises regardless of their location. However, mental health advocates emphasize the need to connect those seeking help with local crisis centers to ensure better access to referral and follow-up services. Currently, the 988 Lifeline routes text users to crisis centers based on their phone's area code, which may not correspond to their location. When a text user's area code does not match their physical location, it can be more difficult to connect these individuals with essential local community crisis and mental health resources. This *Fourth Report and Order*, if adopted, would require text providers to support georouting for 988 text messages, so the Lifeline may route these messages to appropriate local crisis centers based on a texter's general geographic location.

What the Fourth Report and Order Would Do:

- Require covered text providers to develop the capability to transmit georouting data to allow routing of 988 text messages based on the general geographic area where the handset is located at the time the 988 text is initiated, and to provide such georouting data, when available, to the 988 Lifeline.
- Require covered text providers to aggregate location data generated from cell-based technology to a level that will not identify the precise location of the handset initiating the 988 text message, in order to protect the privacy of Lifeline users.
- Provide the flexibility to use technically feasible options for meeting these requirements, to the extent compatible with the routing platform used by the 988 Lifeline.
- Establish an implementation timeline of 18 months for nationwide text providers, and 36 months for non-nationwide text providers, to support industry efforts to efficiently develop and implement 988 text georouting capabilities.

[*]This document is being released as part of a "permit-but-disclose" proceeding. Any presentations or views on the subject expressed to the Commission or its staff, including by email, must be filed in WC Docket No. 18-336, which may be accessed via the Electronic Comment Filing System (https://www.fcc.gov/ecfs). Before filing, participants should familiarize themselves with the Commission's *ex parte* rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission's meeting. *See* 47 CFR § 1.1200 *et seq*.

Before the
Federal Communications Commission
Washington, D.C. 20554

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

FOURTH REPORT AND ORDER*

Adopted: [] **Released: []**

By the Commission:

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I. INTRODUCTION

1. Today, we continue the Commission's longstanding efforts to improve access to the critical, lifesaving resources provided by the 988 Suicide & Crisis Lifeline (988 Lifeline or Lifeline). We do so by adopting rules that require wireless providers to transmit data that enables text messages sent to the 988 Lifeline to be routed to the closest local crisis center based on a person's general geographic

* This document has been circulated for tentative consideration by the Commission at its July 24, 2025 open meeting. The issues referenced in this document and the Commission's ultimate resolutions of those issues remain under consideration and subject to change. This document does not constitute any official action by the Commission. However, the Chairman has determined that, in the interest of promoting the public's ability to understand the nature and scope of issues under consideration, the public interest would be served by making this document publicly available. The Commission's *ex parte* rules apply and presentations are subject to "permit-but-disclose" *ex parte* rules. *See, e.g.*, 47 CFR §§ 1.1206, 1.1200(a). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission's meeting. *See* 47 CFR §§ 1.1200(a), 1.1203.

location. This will maximize the value of the Lifeline's text-based services and improve access to lifesaving care while protecting the privacy of those who reach out for help. Service providers are already required to implement similar georouting capabilities for voice calls made to the 988 Lifeline.[1] This *Order* adopts parallel requirements for text messages so that all Americans in crisis have access to help, regardless of the technology used to contact the Lifeline.

2. In doing so, we build on a history of successful initiatives by the Commission, service providers, our federal partners at the Substance Abuse and Mental Health Services Administration (SAMHSA) and the U.S. Department of Veterans Affairs (VA), and other stakeholders to expand access to the Lifeline. In particular, we leverage ongoing voluntary work being done by wireless service providers to develop text-to-988 georouting solutions with the Lifeline administrator.[2] The rules we adopt today support these efforts by providing a flexible, technology-neutral regulatory landscape for providers to develop text georouting solutions that are tailored to the needs of their networks and subscribers.

3. The need for our rules is clear when considering the devastating impact of suicide, which claimed more than 49,000 lives in 2023 alone, according to data from the Centers for Disease Control and Prevention, and was the second leading cause of death for people ages 10-34.[3] Suicide also disproportionately impacts veterans, rural Americans, and other at-risk individuals.[4] While the Lifeline provides an essential tool to combat this epidemic, according to the current administrator of the Lifeline, Vibrant Emotional Health (Vibrant or Lifeline Administrator), many of the individuals that reach 988 will need resources for follow-up care, including referrals to mental health resources within their local communities.[5] Currently, however, texts to 988 are routed based on the area code of the texter's phone number, rather than their location.[6] When a texter's area code does not correspond to their geographic location, it can be more difficult for these individuals to access the benefits of local resources.

4. In order to address this challenge, this *Fourth Report and Order* requires wireless providers to develop the capability to transmit georouting data in a format compatible with the Lifeline's platform so that texts may be routed to the geographic area where the handset is located, and to provide such georouting data for 988 text messages, when available, to the Lifeline. To protect the privacy of Lifeline users, the *Order* requires covered wireless providers to aggregate location data generated from cell-based technology to a level that will not identify the precise location of the handset, but only the community from which the text originated, thereby making local resources available while protecting

[1] *See* 47 CFR § 52.202.

[2] *See* CTIA Reply at 9 ("The record developed in this proceeding makes clear that the wireless industry is continuing to collaboratively and voluntarily support efforts to improve the 988 Lifelin[e] . . . by identifying technical solutions to provide georouting data with text messages to 988."). Unless otherwise noted, all comments and reply comments cited herein refer to those filed in response to the *988 Georouting Third Further Notice* in WC Docket No. 18-336. *See Implementation of the National Suicide Hotline Act of 2018*, WC Docket No. 18-336, Third Report and Order and Third Further Notice of Proposed Rulemaking, 39 FCC Rcd 11823 (2024) (*988 Georouting Third Report and Order* or *Third Further Notice*).

[3] Centers for Disease Control and Prevention, *Facts about Suicide*, https://www.cdc.gov/suicide/facts/index.html (last visited June 30, 2025).

[4] *Id.*

[5] *See* Vibrant Emotional Health Comments at 6 (Vibrant Comments); *see also* County of Los Angeles Department of Mental Health Comments at 2 (LA County DMH Comments) (explaining that LA County residents that connect to out-of-area call centers may reach a counselor that is unfamiliar with LA County resources); Deaf Equality, Communication Service for the Deaf, TDIforAccess, and National Association of the Deaf Comments at 4 (Accessibility Organizations Comments).

[6] CX360 Comments at 10 ("CX360 already handles text messages to the 988 Lifeline, including routing those text messages to a geographically appropriate crisis center based on the help seeker's area code.").

texters' identities. Finally, in order to support industry efforts to efficiently develop and implement 988 text georouting capabilities, the *Order* adopts an implementation time frame of 18 months for nationwide providers, and 36 months for non-nationwide providers.

II. BACKGROUND

5. The 988 Lifeline is a helpline that connects individuals with a national network of over 200 crisis centers that provide 24/7 confidential support for people experiencing emotional, suicidal, and substance use crises through call, text, and chat services.[7] The Lifeline is overseen by SAMHSA, which is part of the Department of Health and Human Services (HHS).[8] Vibrant, a non-profit mental-health organization, currently serves as the Lifeline Administrator under a grant awarded by SAMHSA.[9]

6. The Commission has long worked to improve access to the 988 Lifeline, supported by Congress, mental health advocates, service providers, and the Commission's federal-agency partners at SAMHSA and the VA. In a series of actions beginning in 2018, the Commission proposed and then designated 988 as the easy-to-remember three digit dialing code to reach the Lifeline.[10] In 2021, the Commission adopted rules to enable text-to-988 capability so that help-seekers could access the Lifeline's critical services through a text message to the 988 dialing code, just as they would through a phone call.[11] Further, the Commission supported efforts to enable direct video calling to 988 so callers who are deaf or hard of hearing and use American Sign Language may reach 988.[12] To strengthen the reliability of 988, in 2023 the Commission adopted rules that require originating service providers and covered 988 service

[7] *See* 988 Suicide & Crisis Lifeline, *About the Lifeline*, https://988lifeline.org/about/ (last visited June 30, 2025); SAMHSA, *Lifeline Timeline*, https://www.samhsa.gov/mental-health/988/lifeline-timeline (last visited June 30, 2025).

[8] In 2007, SAMHSA and the Department of Veterans Affairs (VA) partnered to establish 1-800-273-8255 (TALK), now 988, as the access point for the Veterans Crisis Line (VCL). Callers dialing 988 and selecting option 1 will be connected to the VCL. For text-to-988, individuals are given the option to connect with counselors from the Veterans Crisis Line or the main 988 Lifeline. *See* SAMHSA, *Lifeline Timeline*, https://www.samhsa.gov/mental-health/988/lifeline-timeline (last visited June 30, 2025); Veterans Crisis Line, *How It Works*, https://www.veteranscrisisline.net/ (last visited June 30, 2025); *see also* 988 Suicide & Crisis Lifeline, *What to Expect*, https://988lifeline.org/get-help/what-to-expect/ (last visited June 30, 2025).

[9] *See* SAMHSA, *Cooperative Agreement for the National Suicide Prevention and Disaster Helpline, Notice of Funding Opportunity Number: SM-21-005*, https://www.samhsa.gov/grants/grants-dashboard?grants_dashboard__search=SM%2021%E2%80%93%20005&f%5B0%5D=by_nofo_number%3ASM-21-005 (last visited June 30, 2025) (listing the grants awarded by SAMHSA to the Mental Health Association of New York City (MHA NYC)); Vibrant, *Who We Are*, https://www.vibrant.org/who-we-are/ (last visited June 30, 2025) (noting that Vibrant was formerly known as MHA NYC). The project period for the current Lifeline Administrator's grant concludes on September 29, 2026. *See* U.S. Dep't of Health and Human Services, SAMHSA, Fiscal Year (FY) 2023 Funding Opportunity, 87 Fed. Reg. 64804, 64805 (Oct. 26, 2022). SAMHSA, as the agency with oversight of the 988 Lifeline, makes determinations regarding grant awards for the administrator.

[10] Previously, the Lifeline was only reachable by dialing a toll free number, 1-800-273-8255 (TALK). *See Implementation of the National Suicide Hotline Improvement Act of 2018*, WC Docket No. 18-336, Report and Order, 35 FCC Rcd 7373, 7385, para. 27 (2020) (*988 First Report and Order*).

[11] *See Implementation of the National Suicide Hotline Improvement Act,* WC Docket No. 18-336, Second Report and Order, 36 FCC Rcd 16901 (2021) (*Text-to-988 Second Report and Order*); *Wireline Competition Bureau Confirms No New Texting Formats for Text-to-988*, WC Docket No. 18-336, Public Notice, DA 25-517 (WCB June 13, 2025) (*WCB 988 Text Formats Public Notice*). *See also* SAMHSA, *988 Lifeline Performance Metrics*, https://www.samhsa.gov/mental-health/988/performance-metrics (last visited June 30, 2025). Since July 2022, the 988 Lifeline has received more than 2,578,111 text messages. *Id.* SAMHSA's performance metrics do not include Veterans Crisis Line text messages as texts to VCL are not routed through 988. *Id.*

[12] *See* 988 Suicide & Crisis Lifeline, *Deaf, Hard of Hearing, Hearing Loss*, https://988lifeline.org/deaf-hard-of-hearing-hearing-loss/ (last visited June 30, 2025).

providers to report 988 Lifeline outages to the Commission's Network Outage Reporting System (NORS).[13] The Commission's outage reporting requirements became effective on April 15, 2025.[14]

7. *Efforts to Improve Routing of 988 Calls*. Many of the Commission's actions to facilitate Lifeline access have focused on improving the routing of 988 calls and text messages. As originally designed, the Lifeline system routed 988 calls to a local crisis center based on the caller's area code and exchange. However, the majority of Americans rely on wireless phones to place calls—including calls to the Lifeline—and a wireless subscriber's area code may not match the area code of their current residence or even the state in which they reside.[15] This mismatch can impair access to the Lifeline's services, because local crisis centers may be better able to assist individuals in crisis, and many of the individuals that reach out to 988 will need resources for follow-up care, including referrals to mental health resources within their current communities.[16]

8. In order to address this challenge, last year, the Commission adopted rules requiring wireless providers to develop georouting[17] solutions for 988 calls, so that callers can be connected to geographically appropriate crisis centers based on their geographic location.[18] The *988 Georouting Third Report and Order* built on voluntary collaborative efforts made by industry stakeholders to develop effective call routing solutions that delivered the benefits of localized routing, maintained the 988 Lifeline's centralized routing system, and safeguarded caller privacy.[19] In order to give providers flexibility, the Commission allowed providers to use any technically feasible options for meeting this

[13] *Ensuring the Reliability and Resiliency of the 988 Suicide & Crisis Lifeline*; *Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications*; *Implementation of the National Suicide Hotline Improvement Act of 2018*, PS Docket Nos. 23-5 and 15-80; WC Docket No. 18-336, Report and Order, 38 FCC Rcd 6917 (2023). Under these rules, covered 988 providers must also directly notify SAMHSA, the VA, and the 988 Lifeline Administrator of any outages that potentially affect 988 special facilities. *Id.* at 6931-33, paras. 23, 25.

[14] *Public Safety and Homeland Security Bureau Announces April 15, 2025 Effective and Compliance Date for Certain Rules Governing Reporting of 911 and 988 Service Outages*, PS Docket Nos. 13-75, 15-80 and 23-5; ET Docket No. 04-35; WC Docket No. 18-336, Public Notice, 39 FCC Rcd 13512 (PSHSB Dec. 17, 2024).

[15] According to a 2016 Pew Research Center Report, roughly "10% of U.S. adults have a cellphone number that doesn't match the state where they actually live." *See* Pew Research Center, *Moving Without Changing Your Cellphone Number: A Predicament for Pollsters*, https://www.pewresearch.org/methods/2016/08/01/moving-without-changing-your-cellphone-number-a-predicament-for-pollsters/. *See also Implementation of the National Suicide Hotline Act of 2018*, WC Docket No. 18-336, Second Further Notice of Proposed Rulemaking, 39 FCC Rcd 4443, 4451-52, para. 14 (2024) (*988 Georouting Second Further Notice*) (citing to the Lifeline Administrator's estimate that 80% of calls placed to the 988 Lifeline are from wireless phones).

[16] *See 988 Georouting Third Report and Order*, 39 FCC Rcd at 11830-32, paras. 13-15 (detailing arguments by mental health and crisis counseling experts stressing the importance of connecting individuals in crisis with local resources, and highlighting that local routing connects individuals to counselors that are more familiar with cultural issues or local community stressors and improves the efficacy of life saving measures, enables individuals to connect with long term care, and lessens the need for emergency services). Vibrant has stated that a June 2024 National Alliance on Mental Illness (NAMI) poll found that 52% of individuals would be more likely to use the 988 Lifeline if connected with a local or in-state crisis contact center. Vibrant Emotional Health Reply, WC Docket No. 18-336, at 1 (rec. Apr. 18, 2025) (Vibrant PN Reply).

[17] Georouting refers to the technical solutions for directing calls based on a geographic location of the originating call without transmitting information about the handset's precise location. Georouting is distinct from geolocation, which involves the transmission of precise location information (e.g., street address) often used to dispatch emergencies services. *988 Georouting Third Report and Order*, 39 FCC Rcd at 11827, para. 7.

[18] *See generally id.*

[19] *Id.* at 11829-30, paras. 11-12. The Commission's rules require providers to aggregate the cell-based location data to a level that will not identify the location of the cell site or base station receiving the 988 call or otherwise identify the precise location of the handset. 47 CFR § 52.202(d) (defining "georouting data").

requirement, to the extent that they are compatible with the systems used by the 988 Lifeline.[20] And, to reduce burdens on smaller wireless providers, the *Georouting Third Report and Order* imposed separate implementation time frames for nationwide and non-nationwide providers, requiring nationwide providers to implement georouting solutions by January 13, 2025, and non-nationwide providers by December 14, 2026.[21]

9. *Georouting for 988 Text Messages*. While nationwide wireless providers—which account for the majority of calls to 988—have successfully implemented georouting for 988 voice calls, text messages remain subject to routing by area code.[22] For this reason, last year the Commission proposed to require wireless providers to implement georouting solutions for text messages to 988.[23] The Commission's proposed requirements built off its approach to georouting for 988 calls. The *988 Georouting Third Further Notice* sought comment on the Commission's proposed two-part requirement for covered text providers to develop the capability to transmit georouting data, and to provide such data for texts to 988, when available, to the Lifeline Administrator.[24] The Commission additionally sought comment on the implementation time frame needed to enable georouting of 988 text messages.[25] To further develop the record on privacy issues associated with these proposals, the Wireline Competition Bureau (Bureau) released a Public Notice in February 2025 that sought further comment on the privacy implications of georouting text-to-988.[26] The *988 Text Georouting Privacy Public Notice* additionally sought further comment on the status of voluntary efforts to identify and develop text-to-988 georouting solutions that were reported in response to the *988 Georouting Third Further Notice*.[27]

III. DISCUSSION

10. In this *Fourth Report and Order*, we take further steps to facilitate access to the 988 Lifeline's critical local support services by requiring covered text providers to develop and implement georouting solutions for 988 text messages. First, based on a review of the record in the *988 Georouting Third Further Notice*, we find that establishing georouting for 988 text messages is essential to ensure that text users are routed to geographically appropriate crisis centers and will provide important benefits to Lifeline users. Next, we define "georouting data" and other relevant terms for purposes of our rules, and adopt a two-part requirement to delineate the scope of covered text providers' obligations. Finally, in order to facilitate ongoing efforts to develop 988 text georouting capabilities, we adopt an implementation time frame of 18 months for nationwide providers, and 36 months for non-nationwide providers.

[20] *988 Georouting Third Report and Order*, 39 FCC Rcd at 11840-41, paras. 27-28.

[21] *See id.* at 11851-52, paras. 49-52; *Wireline Competition Bureau Announces Compliance and Comment Dates for the 988 Georouting Proceeding*, WC Docket No. 18-336, Public Notice, 39 FCC Rcd 12469 (WCB 2024) (*WCB 988 Georouting Compliance Dates Public Notice*).

[22] *WCB 988 Georouting Compliance Dates Public Notice*. *See 988 Georouting Third Report and Order*, 39 FCC Rcd at 11838, para. 25 (defining nationwide CMRS provider to mean "those providers whose service extends to a majority of the population and land area of the United States").

[23] *See generally 988 Georouting Third Further Notice*.

[24] *Id.* at 11863, para. 78.

[25] *Id.* at 11868-69, para. 88 (proposing to require that "covered text providers comply with the proposed text-to-988 georouting requirements by a uniform implementation deadline of six months from the effective date of final rules").

[26] *Wireline Competition Bureau Seeks Further Comment on Privacy Issues Related to Text-to-988 Georouting*, WC Docket No. 18-336, Public Notice, DA 25-148 (WCB Feb. 19, 2025) (*988 Text Georouting Privacy Public Notice*).

[27] *Id.* at 3; *see also* CTIA Comments at 7; CX360 Comments at 2; Vibrant Comments at 4-5; AT&T Reply at 3-4; CTIA Reply at 2; CX360 Reply at 1 (all describing voluntary efforts to develop an industry-based georouting solution for 988 text messages).

A. Text-to-988 Georouting Will Improve Access and Efficiency of the Lifeline

11. Today, in the absence of georouting, providers route 988 text messages to the Lifeline's centralized system.[28] After a text message reaches 988, the Lifeline Administrator is responsible for routing the text message to an individual crisis center and currently does so based on the area code associated with the text user's wireless device.[29] This inhibits the Lifeline's ability to provide access to more localized services when a text user's area code does not correspond to their geographic location.[30]

12. Based on our review of the record, we find that requiring providers to implement a georouting solution for 988 text messages is essential to improving access to the Lifeline's critical mental health crisis and suicide prevention services. The record overwhelmingly supports the conclusion that georouting for 988 text messages will help connect individuals with more geographically appropriate crisis centers that should have a better understanding of available local resources and unique community stressors.[31] As Reimagine Crisis Response explains, local crisis centers are better positioned to connect individuals "with local mental health care, resources, and support that can help . . . beyond the initial crisis."[32] According to the current Lifeline Administrator, many individuals that reach out to 988 need resources for follow-up care, including referrals to mental health resources within their current local communities.[33] Several commenters agree that georouting for 988 text messages will improve access to referral and follow-up services that may reduce the risk of future mental health and suicidal crises.[34]

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[28] *See* 47 CFR § 52.201(a); *988 Georouting Third Report and Order*, 39 FCC Rcd at 11853, para. 53 (revising the Commission's existing 988 voice and texting rules to permit routing to the national suicide prevention and mental health crisis hotline system without need for translation to the toll free access number).

[29] *See* CX360 Comments at 10 (stating that CX360 routes 988 text messages "to a geographically appropriate crisis center based on the help seeker's area code"); Vibrant Comments at 2-3 (describing the Lifeline Administrator's role in managing the routing of 988 text messages); SAMHSA, Saving Lives in America: 988 Quality and Services Plan at 5 (2024), https://www.samhsa.gov/sites/default/files/saving-lives-american-988-quality-service-plan.pdf (SAMHSA 988 Quality and Services Plan) (noting that "texts to the 988 Lifeline are routed to the nearest 988 crisis contact center based on where the . . . phone number area code is registered").

[30] *See, e.g.*, Association for Behavioral Health and Wellness Comments at 2 (ABHW Comments) ("Since 988 texts are routed using cell phone numbers, this leads to text message misrouting."); Accessibility Organizations Comments at 3-4; LA County DMH Comments at 2-3; Steve Alanzo Comments at 1 (filed on behalf of the International Association of Fire Chiefs) (IAFC Comments).

[31] *See, e.g.*, ABHW Comments at 1 (stating that "georouting 988 texts are essential to providing lifesaving local support and resources"); American Foundation for Suicide Prevention Comments at 2 (AFSP Comments) (explaining that local counselors are "more likely to share a cultural connection to people reaching out for help"); CTIA Comments at 7 ("CTIA and its member companies will continue to support efforts to improve the 988 Lifeline's ability to connect people in mental health crisis with the most appropriate resources."); IAFC Comments at 1 (asserting that "local crisis centers will likely be more familiar with the local area's resources or community stressors"); *see also, e.g.*, Accessibility Organizations Comments at 2-3; Boulder Regional Emergency Telephone Service Authority Comments, WC Docket No. 18-336, at 2-3 (filed Apr. 3, 2025) (BRETSA PN Comments); CX360 Comments at 4; Intrado Life & Safety Comments at 1 (Intrado Comments); LA County DMH Comments at 1; NAMI Comments at 1-2; Reimagine Crisis Comments at 1-2; Trevor Project Comments at 2; Vibrant Comments at 5-6; AT&T Reply at 1; Comtech Reply at 2; Letter from Crisis Text Line to Jessica Rosenworcel, Chairwoman, FCC, WC Docket No. 18-336, at 1-2 (filed Nov. 20, 2024) (Crisis Text Line Nov. 20, 2024 *Ex Parte*).

[32] NAMI-Reimagine Crisis Comments, WC Docket No. 18-336, at 1-2 (filed Apr. 3, 2025) (Reimagine Crisis PN Comments).

[33] *See* Vibrant Comments at 6.

[34] *See, e.g.*, Intrado Comments at 1 (arguing that "georouting for both voice and text should be a basic expectation for 988 to provide the best possible care for callers/texters by connecting them with counselors who are trained in local resources and events and can provide local referrals"); *see also* Accessibility Organizations Comments at 4; LA County DMH Comments at 2; Vibrant Comments at 6; AT&T Reply at 4.

13. Mental health and public safety commenters emphasize that georouting for 988 text messages will improve access for youth and young adults.[35] Indeed, in response to the *988 Georouting Second Further Notice*, we received over 450 comments from American Foundation for Suicide Prevention (AFSP) advocates expressing support for requiring georouting for 988 text messages, all emphasizing the significant benefits for children and young adults.[36] As the current Lifeline Administrator explains, georouting for 988 text messages will "help connect young people with counselors who may have a deeper insight into the unique exacerbators within their local communities."[37] AFSP further notes that georouting is particularly important for "college-aged young adults [who] may be attending schools and universities . . . in areas that do not correspond with their cell phones' area codes."[38]

14. Many commenters also agree that georouting for 988 text messages will enhance access to local resources and follow-up care services for individuals with disabilities, including individuals who are deaf, hard of hearing, or have a speech disability.[39] As the Accessibility Organizations explain, text messaging is "a preferred or necessary mode of communication, due to barriers to making voice calls," for many individuals with disabilities.[40] The record further indicates that georouting for 988 text

[35] AFSP Comments at 2-3 ("Georouting solutions to ensure . . . texts are sent to the closest contact center will support children and young adults nationwide."); *see also, e.g.*, ABHW Comments at 2; IAFC Comments at 1; NAMI Comments at 2; Reimagine Crisis Comments at 1-2; Trevor Project Comments at 4.

[36] *See* AFSP Comments, WC Docket No. 18-336, at 3 (rec. June 27, 2024) (AFSP June 27, 2024 Comments) ("Requiring georouting for texts will significantly benefit youth and young adults who are the majority of individuals reaching out to the 988 Lifeline via text."); *see also, e.g.*, Brian Clifton Comments (Express) (rec. June 27, 2024); Alexandra Walker Comments (Express) (rec. June 28, 2024) (all stating that "[r]equiring georouting for texts in addition to calls will significantly benefit children and young adults, as the majority of individuals reaching out to the 988 Lifeline via text are youth"). The express filings submitted in response to the *988 Georouting Second Further Notice* are available on the Commission's Electronic Comment Filing System (ECFS) in WC Docket No. 18-336. Initial comments on the *988 Georouting Second Further Notice* were due on or before June 28, 2024, and reply comments were due on or before July 29, 2024. *Wireline Competition Bureau Announces Comment and Reply Comment Dates for 988 Georouting Second Further Notice of Proposed Rulemaking*, WC Docket No. 18-336, Public Notice, 39 FCC Rcd 5725 (WCB 2024).

[37] Vibrant Comments at 2.

[38] AFSP Comments at 2-3.

[39] *See, e.g.*, Accessibility Organizations Comments at 4 ("For deaf, hard of hearing and speech disabled people, where regional services and familiarity with state-specific resources can significantly impact the quality of care, georouting ensures that at the local level."); AFSP Comments at 3 (asserting that georouting for texts helps ensure that all users can reach out to the 988 Lifeline, including persons with disabilities); NAMI Comments at 2 (arguing that text-to-988 georouting will "ensure that people with hearing and speech disabilities have a similar experience to help seekers who call 988 for assistance, connecting them to local services in their community"); Vibrant Comments at 2 (stating that text-to-988 georouting will "ensure that vulnerable groups are connected with counselors who can understand their specific cultural, social, and geographic contexts"); AT&T Reply at 1 (stating that text-to-988 georouting is "especially important to persons who are deaf, hard-of-hearing, or with a speech disability, and thus less inclined to *call* 988").

[40] Accessibility Organizations Comments at 4 (arguing that text-to-988 georouting "is particularly important for communities where texting is a preferred or necessary mode of communication, due to barriers to making voice calls, such as for deaf, hard of hearing or speech disabled people").

messages will provide benefits for other disproportionately impacted populations, including older men,[41] rural communities,[42] and individuals with low incomes[43] or safety concerns.[44]

15. We also find georouting for 988 text messages will help ensure that Americans in crisis have access to help, regardless of whether they call or text the Lifeline. As the National Alliance on Mental Illness (NAMI) asserts, implementing georouting for voice calls but not for text messages may cause confusion and undermine trust in the 988 Lifeline.[45] Additionally, as several commenters emphasize, achieving routing parity with voice calls will help to minimize inconsistencies in service quality that might otherwise discourage individuals from seeking help, further increasing trust in the 988 Lifeline.[46]

B. Definitions

16. As proposed in the *988 Georouting Third Further Notice*, for the purposes of the rules we adopt today, we incorporate the definitions of the terms "covered 988 text message" and "covered text provider," as adopted in the *Text-to-988 Second Report and Order*.[47] We similarly rely on the definitions of "Commercial Mobile Radio Service (CMRS)" and "georouting data" adopted by the Commission in the *988 Georouting Third Report and Order*.[48] No commenter opposed this approach.[49] We find that

[41] *See* Vibrant Comments at 2 (stating that "other disproportionately impacted populations, such as older men and those in rural areas, would greatly benefit from engaging with local crisis contact centers that are familiar with the area, community environment, and available resources").

[42] *See, e.g.*, Accessibility Organizations Comments at 5 (arguing that text-to-988 georouting is "particularly critical for high-risk populations who rely on text-based communication, such as individuals in rural areas"); AFSP Comments at 3 (asserting that georouting for 988 texts would improve access to the Lifeline by those in rural areas with otherwise limited access to mental health services); Vibrant Comments at 2 ("Text messaging is crucial in rural communities where poor cellular signals can hinder voice calls but still allow for text communication."); Washington State Department of Health, WC Docket No. 18-336, at 3 (rec. June 28, 2024) (Washington DOH June 28, 2024 Comments).

[43] LA County DMH Comments at 1 ("Text-to-988 is an essential entry point for some of the County's highest need populations to access crisis mental health services, including youth, people of color, and low-income households.").

[44] *See* Accessibility Organizations Comments at 5; LA County DMH Comments at 1; Washington State DOH June 28, 2024 Comments at 3.

[45] NAMI Comments, WC Docket No. 18-336, at 4 (rec. June 28, 2024) (NAMI June 28, 2024 Comments) ("If georouting is implemented for calls but not text, there is likely to be confusion among people contacting 988 for help, which creates further distrust among potential help-seekers.").

[46] *See, e.g.*, Accessibility Organizations Comments at 3 ("This step is critical for ensuring parity between text-based and voice-based access to the 988 Lifeline."); Electronic Privacy Information Center and Wildflower Alliance Reply, WC Docket No. 18-336, at 3-4 (filed Apr. 18, 2025) (EPIC-WA PN Reply) (stating that "[w]hen [a] service is not trusted, it tends to be avoided"); Letter from Michael McMenamin, Counsel, Winning Strategies Washington, to Marelene H. Dortch, Secretary, FCC, WC Docket No. 18-336, at 1 (filed May 5, 2025) (NAMI May 5, 2025 *Ex Parte*) ("Establishing trust in the 988 Lifeline is essential to ensuring that people in crisis are not discouraged from using the service when they need it most."); *see also* AFSP Comments at 2; CX360 Comments at 4; LA County DMH Comments at 2-3; NAMI Comments at 1-2; Reimagine Crisis Comments at 1-2; Vibrant Comments at 5-6; AT&T Reply at 4 (all supporting the importance of achieving parity between 988 calls and text messages).

[47] 47 CFR § 52.201(c); *988 Georouting Third Further Notice*, 39 FCC Rcd at 11860, para. 71; *Text-to-988 Second Report and Order*, 36 FCC Rcd at 16910, 16914, paras. 16, 22.

[48] 47 CFR § 52.202(d); *see also 988 Georouting Third Report and Order*, 39 FCC Rcd at 11834, para. 18. To preserve consistency across the requirements for georouting 988 calls and georouting text-to-988, we likewise use the definition of "Lifeline Administrator" adopted by the *988 Georouting Third Report and Order*.

[49] Although supportive of the Commission's existing definitions for these terms, the Accessibility Organizations urge the Commission to account for the accessibility needs of individuals who are deaf or hard of hearing, or have a speech or other disability that impacts communication in crafting rules for 988 text georouting. Accessibility

(continued….)

relying on the Commission's existing definitions will ensure technological neutrality and regulatory consistency across our rules with respect to 988 georouting.

17. *Covered 988 Text Message*. We apply our 988 text georouting requirements to "covered 988 text messages" as that term is defined in the *Text-to-988 Second Report and Order*,[50] thereby limiting our georouting rules to "988 text messages"[51] that are in an Short Message Service (SMS) format.[52] The record overwhelmingly supports limiting our requirements to SMS messages at this stage, in order to conform with the existing technical capabilities of the Lifeline, which can currently only receive SMS texts.[53] While Intrado Life & Safety (Intrado)[54] argues that the rules should obligate georouting of the text portion of Multimedia Message Service (MMS), we find that limiting our georouting rules to messages sent in SMS format will enable the 988 Lifeline to leverage current technology while developing georouting solutions that could adapt to messaging protocols such as MMS and Rich Communications Service (RCS) if necessary in the future.[55] In the *Text-to-988 Second Report and Order*, the Commission delegated to the Bureau the authority to make future determinations to require covered text providers to support additional text formats, in the event that the Lifeline developed the capability to receive such messages.[56] We further direct the Bureau to determine through its ongoing consultation process with SAMHSA and the VA whether the 988 Lifeline can accept georouting data with any newly identified text formats. In the event that the 988 Lifeline becomes capable of accepting any additional

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Organizations Comments at 6. We find that georouting text-to-988 will have a significant impact on connecting individuals, including those who are deaf or hard of hearing, or have a speech or other disability that impacts communication, to local resources and improve the accessibility of lifesaving resources. We therefore adopt our proposal in the *Further Notice* to incorporate the definitions adopted by the Commission in the *Text-to-988 Second Report and Order* and *988 Georouting Third Report and Order* with our 988 text georouting rules.

[50] *Text-to-988 Second Report and Order*, 36 FCC Rcd at 16914, para. 22.

[51] 47 CFR § 52.201(c) (defining "988 text message" as "(i) . . . 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 transmitting device by means of a 10-digit telephone number, N11 service code, or 988; (ii) includes and is not limited to a SMS message and a multimedia message service (MMS) message; and (iii) does not include—(A) a real-time, two-way voice or video communication; or (B) a message sent over an IP-enabled messaging service to another user of the same messaging service, except a message described in paragraph (b) [of section 52.201 of the Commission's rules].").

[52] *Id.* (defining a "[c]overed 988 text message" as "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").

[53] *See, e.g.*, Accessibility Organizations Comments at 4; CTIA Comments at 6; CX360 Comments at 9-10; NAMI Comments at 2; AT&T Reply at 9; CTIA Reply at 8; CX360 Reply at 9; Voice on the Net Coalition Reply at 3 (VON Reply).

[54] In this *Fourth Report and Order*, we use "Intrado" to refer to the entity previously referred to in this proceeding as "Intrado Life & Safety." For a full discussion of the Intrado organization, see *988 Georouting Second Further Notice*, 39 FCC Rcd at 4449, para. 10 & n.45.

[55] *See* Intrado Reply at 3, n.6; *see also* AT&T Reply at 9 (arguing that "[s]upport for other messaging formats is not justified because they are either not offered by Lifeline crisis centers, like [MMS], and/or they are still evolving, like [RCS]"); Vibrant PN Reply at 3 (agreeing that "any solution must consider the future evolution of text messaging, with the anticipated coexistence of [SMS], MMS and RCS" and that text-to-988 georouting solutions that are "not entirely dependent on SMS-based protocols" are in development).

[56] *See Text-to-988 Second Report and Order*, 36 FCC Rcd at 16914, 16916, paras. 22 & 25. In connection with this delegated authority, the Commission directed the Bureau to consult with SAMHSA and the VA on whether any text formats other than SMS are compatible with the 988 Lifeline. *Id.*

text formats, the Bureau shall seek comment on whether to require providers to transmit georouting data for such text formats in its annual public notice.[57]

18. *Covered Text Providers*. We apply our 988 text georouting requirements to "Covered Text Providers," as defined in the *Text-to-988 Second Report and Order*.[58] Covered text providers include "all [Commercial Mobile Radio Services (CMRS)] providers, as well as 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."[59] As noted above, our text georouting requirements are limited to 988 text messages sent in SMS format and therefore do not apply to over-the-top providers.[60]

19. *Georouting Data*. For the purposes of these rules, we define "georouting data" to mean location data generated from cell-based location technology that is aggregated to a level that will not identify the specific location of the cell site or base station receiving the 988 text message or otherwise identify the precise location of the handset.[61] We note that this definition, which is consistent with that adopted in the *988 Georouting Third Report and Order*,[62] precludes the transmission of more precise

[57] We emphasize that this delegated authority is limited in scope. The Bureau may incorporate additional text formats into the Commission's rules if, and only if, the Lifeline becomes able to receive such messages, in which case it must provide notice and an opportunity for comment before adopting any new requirements. *See Text-to-988 Second Report and Order*, 36 FCC Rcd at 16914, 16916, paras. 22 & 25; *WCB 988 Text Formats Public Notice*. The Bureau is also required to "identify all implementation deadlines with certainty (i.e., by a specified calendar date)" and in doing so, must "assess factors such as technical and financial challenges with respect to implementation, the status of the Lifeline, and the public interest." *Text-to-988 Second Report and Order*, 36 FCC Rcd at 16917, para. 25.

[58] *See Text-to-988 Second Report and Order*, 36 FCC Rcd at 16919, para. 30.

[59] 47 CFR § 52.201(c) ("Covered text provider" includes "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."); *see also Text-to-988 Second Report and Order*, 36 FCC Rcd at 16919, para. 30; *988 Georouting Third Further Notice*, 39 FCC Rcd at 11860, para. 71.

[60] An over-the-top provider refers to services accessed through broadband connections obtained by the consumer, or through public or private Wi-Fi connections that may not access cellular networks. *See Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*; *Framework for Next Generation 911 Deployment*, PS Docket Nos. 11-153 and 10-255, Second Report and Order and Third Further Notice of Proposed Rulemaking, 29 FCC Rcd 9846, 9860, para. 28 & n.85 (2014). *See also* VON Reply at 3-4 (arguing that "it is technically infeasible to require any service provider, other than licensed wireless providers, to get location information from their users, when they are not providing the network infrastructure, and then expect that they can route 988 texts based on that location"); *988 Georouting Third Further Notice*, 39 FCC Rcd at 11863, para. 76 & n.294.

[61] *See infra* Appx. A; *988 Georouting Third Report and Order*, 39 FCC Rcd at 11834, para. 18. CX360 Comments at 5-6 (CX360 calls for the Commission to adopt a definition for georouting data in line with the definition adopted in the *988 Georouting Third Report and Order* to provide the same flexibility to satisfy georouting requirements and use technically feasible options for meeting the requirements to the extent they are compatible with the systems used by the 988 Lifeline.). Vibrant initially raised concern that adopting this definition of georouting data for text-to-988 was too broad, however, it later indicated agreement with the proposed approach and "recommend[ed] that any proposed georouting solution should utilize cell tower data, obtained from a carrier, to determine the geographic origin of 988 Lifeline text messages." *See* Vibrant Comments at 3-4; Vibrant Comments, WC Docket No. 18-336, at 5 (filed Apr. 3, 2025) (Vibrant PN Comments); Letter from Cara McNulty, Chief Executive Officer, Vibrant Emotional Health, to Jessica Rosenworcel, Former Chairwoman, FCC, WC Docket No. 18-336, at 3-4 (filed Jan. 16, 2025) (Vibrant Jan. 16, 2025 *Ex Parte*).

[62] The definition of georouting data adopted in this *Fourth Report and Order* is the same as that used for our georouting rules for 988 voice calls, apart from its application to "covered 988 text message[s]," as opposed to "988 call[s]." *See infra* Appx. A; 47 CFR § 52.202(d).

location data.[63] The *988 Georouting Third Report and Order* found that this approach would "best identify a caller's location to enable routing of 988 calls to geographically appropriate crisis centers, while maintaining the privacy interests of callers" and "provid[ing] nationwide providers flexibility to deploy current georouting solutions developed with the SAMHSA and the Lifeline Administrator."[64] As explained below, we find that these considerations apply equally with respect to our text-to-988 georouting rules.[65]

20. *Commercial Mobile Radio Service*. We also adopt our proposal to revise section 52.201(b) of the Commission's rules to read "Commercial Mobile Radio Service" instead of "Commercial Mobile Radio Services."[66] This correction is necessary to align the rule with the Commission's intent, as stated in the *Text-to-988 Second Report and Order*, to adopt the well-established text-to-911 definition of "covered text provider."[67] We note that no commenter questioned our proposal.

C. Scope of Text-to-988 Georouting Requirement

21. In this *Fourth Report and Order*, we adopt general requirements designed to enhance the Lifeline's ability to connect text users to geographically appropriate crisis centers, while safeguarding the critical privacy interests of individuals seeking life-saving assistance. Specifically, we require covered text providers to: (1) develop the capability to transmit georouting data in a format that is compatible with the Lifeline's system 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 988 text messages, when available, to the Lifeline Administrator. In adopting these rules, we support voluntary efforts to identify and develop industry-based georouting solutions for 988 text messages by providing a flexible, technology-neutral framework for our requirements.

1. Capability to Provide Georouting Data

22. Consistent with the *988 Georouting Third Further Notice*,[68] we first require covered text providers to develop the capability to transmit georouting data for 988 text messages in a format that is compatible with the Lifeline's routing platform.[69] We find that this requirement is necessary to ensure that 988 text users receive the benefits of georouting,[70] regardless of the covered text providers' network configurations. As with the other requirements we adopt today, we give covered text providers the flexibility to use technically feasible options that are best suited to their networks, provided that the

[63] *988 Georouting Third Report and Order and Further Notice*, 39 FCC Rcd at 11834-35, paras. 18-20 (defining "georouting data" for voice-to-988 georouting rules); *id.* at 11863, para. 77 (proposing to adopt the same definition for text-to-988 georouting rules).

[64] *Id.* at 11845-48, paras. 36-41.

[65] Some commenters assert that georouting based on the location of the tower in which the contact was initiated does not provide sufficient granularity to dispatch emergency services. *See, e.g.*, BRETSA PN Comments at 3. As discussed in greater detail below, we find that georouting based on aggregated, cell-based location information best balances the benefits of location-based routing with the privacy interests of 988 users. *See infra* Section III.C.1.

[66] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11863, para. 77 & n.295.

[67] *Text-to-988 Second Report and Order*, 36 FCC Rcd at 16919, paras. 30-31 (adopting the text-to-911 definition of "covered text provider" for text-to-988). Compare 47 CFR § 52.201(b) (currently defining "CMRS" for text-to-988 purposes as "Commercial Mobile Radio Service*s*"), with 47 CFR § 9.3 (defining "CMRS" for 911 purposes as "Commercial Mobile Radio Service") (emphasis added).

[68] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11865, para. 81.

[69] *See infra* Appx. A (new 47 CFR § 52.203(a)(1)).

[70] *Supra* Section III.A.

georouting solutions are compatible with the Lifeline's system.[71] We make clear that our rules create an ongoing obligation for covered text providers to ensure that georouting data remains compatible with the Lifeline's system, and we encourage stakeholders to collaborate in developing and testing such solutions.

23. The record strongly supports requiring any text-to-988 georouting solutions to be compatible with the Lifeline's system and infrastructure.[72] For example, CTIA argues that we should "continue to rely on technologies that are consistent with covered text providers' and the Lifeline's system[] to facilitate prompt and seamless implementation of new capabilities, including georouting."[73] The Accessibility Organizations add that this approach "ensures uniformity, reducing the chances of technical mismatches or delays in delivering critical support."[74] We therefore agree with the Lifeline Administrator and T-Mobile that "the best georouting solution will be one that can integrate with the 988 Lifeline's current routing network."[75]

24. We recognize that our federal partners may choose to expand the Lifeline's system to support a broader range of compatible text-to-988 georouting solutions. Accordingly, and similar to the Commission's approach for voice-to-988 georouting,[76] we direct the Bureau to routinely consult with SAMHSA regarding the format of text-to-988 georouting data that is compatible with the 988 Lifeline's system. We further direct the Bureau to monitor the development of text-to-988 georouting solutions and, if necessary, propose and seek comment on implementation parameters for covered text providers for any compatible text-to-988 georouting data that is substantially modified from the requirements adopted herein.

25. *Aggregation of Cell-Based Location Data.* As numerous commenters observe, the privacy interests of 988 text users are paramount.[77] For this reason, we require covered text providers to

[71] *See, e.g.*, CCA Comments at 4 (noting that "the Commission recognized the importance of a flexible framework for calls to 988" and arguing that "[a] similar approach for text to 988 messages would be equally appropriate, particularly given the ongoing technological development"); CX360 Comments at 5-6 (noting that the Commission allowed providers to use technically feasible options that were compatible with the systems used by the Lifeline for voice-to-988 georouting and supporting "the same flexibility for georouting text-to-988"); Letter from Angela Y. Kung, Mintz, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-336 at 1 (filed Mar. 21, 2025) (filed on behalf CX360) (CX360 Mar. 21, 2025 *Ex Parte*) (urging "the Commission to take a flexible regulatory approach to text-to-988 georouting that mirrors . . . voice-to-988 regulations"); *id.* at 10 (arguing that any "text-to-988 georouting regulation adopted by the Commission should . . . [r]equire compatibility with existing 988 infrastructure").

[72] *See, e.g.*, Accessibility Organizations Comments at 8; CCA Comments at 4; CTIA Comments at 5; CX360 Comments at 9; Vibrant Comments at 5; T-Mobile Comments, WC Docket No. 18-336, at 4 (filed Apr. 3, 2025) (T-Mobile PN Comments); AT&T Reply at 7; *but see* CPAC Foundation's Center for Regulatory Freedom Reply at 2 (CPAC Reply) (opposing the requirement and arguing "that every covered text provider in the U.S. will be required to engage in approximate geolocation reporting to a federal government agency, even if they are currently unable to do so"). As we have explained, we are adopting a rule that does not mandate geolocation reporting and that defines georouting data as"[l]ocation 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 covered 988 text message or otherwise identify the precise location of the handset."

[73] CTIA Comments at 6.

[74] Accessibility Organizations Comments at 8.

[75] *See* T-Mobile PN Comments at 4; Vibrant Jan. 16, 2025 *Ex Parte* at 3.

[76] *988 Georouting Third Report and Order*, 39 FCC Rcd at 11841, para. 30.

[77] *See, e.g.*, AFSP Comments at 2 ("It is important that any georouting information system does not create obstacles to, or compromise the privacy of, any users[.]"); CX360 Comments at 7 (stating that "ensuring the privacy of help seekers who call or text 988 is essential for building and maintaining public trust in the 988 Lifeline"); NAMI Comments at 2-3; Trevor Project Comments at 4; Reimagine Crisis PN Comments at 2; *see also* AT&T Reply at 4-5; CPAC Reply at 2; CTIA Reply at 7; CX360 Reply at 2, 8; Intrado Reply at 1.

aggregate location data generated from cell-based technology to a level that will not identify the location of the cell site or base station receiving the 988 text or otherwise identify the precise location of the handset.[78] As with the Commission's approach for voice-to-988 georouting, in adopting this requirement, we carefully balance the importance of maintaining user privacy with the need to expeditiously improve the routing of text messages to the Lifeline.[79]

26. The *988 Georouting Third Further Notice* and *988 Text Georouting Privacy Notice* sought comment to determine the necessary granularity of location data for text-to-988 georouting that protects the privacy expectations of text users, while still facilitating access to more localized services.[80] In response, commenters generally argued that covered text providers need flexibility to develop and implement text-to-988 georouting solutions.[81] To that end, rather than a prescriptive rule, we establish a general requirement that allows covered text providers flexibility to use technically feasible methods that are best suited to their networks to aggregate location data.[82]

27. Based on our review of the record, we find that aggregating location data to county-level or wire-center boundaries is sufficiently general to protect text users' privacy[83] while improving the routing of 988 text messages.[84] The record indicates that the industry-based text georouting solution currently under development by nationwide wireless providers, the current Lifeline Administrator, and its vendor utilizes county-level FIPS code boundaries based on cell tower information and does not introduce precise location information into the 988 data flow.[85] In its comments, the Lifeline Administrator states that the "solutions under consideration will use county-level data," which "minimizes user-specific data to

[78] *See* Appx. A (new 47 CFR § 52.203 (defining "georouting data")). The rules we adopt today protect privacy interests by prohibiting the transmission of more granular cell site data or the precise location of the text user, while allowing covered text providers flexibility in implementing technical solutions that use different granularity of data, such as wire center or Federal Information Processing Series (FIPS) code geographic boundaries.

[79] *988 Georouting Third Report and Order*, 39 FCC Rcd at 11846, paras. 37-38.

[80] *See id.* at 11866-68, paras. 84-85; *988 Text Georouting Privacy Public Notice* at 5-6.

[81] CTIA Comments at 5 ("[T]o the extent that the Commission considers adopting such regulations, the Commission should continue the flexible, technology-neutral approach that has enabled the successful implementation of 988."); *see also* Accessibility Organizations Comments at 4; CCA Comments at 3-4; CX360 Comments at 15-16; Vibrant Comments at 5; AT&T Reply at 2; CTIA Reply at 7-8.

[82] *See, e.g.*, CX360 Comments at 5-6 (urging the Commission to decline to specify a particular method of aggregating location data); AT&T Reply at 8 (stating that "any solution should be technology-neutral, giving providers, the Lifeline, and its vendors flexibility to develop and implement the solution that best meets their network designs and capabilities").

[83] *See, e.g.*, ABHW Comments, WC Docket No. 18-336, at 2 (filed Apr. 3, 2025) (ABHW PN Comments); CTIA Comments, WC Docket No. 18-336, at 2-3 (filed Apr. 3, 2025) (CTIA PN Comments) (arguing that the current industry-based georouting solution maintains "privacy by avoiding delivery of precise location information"); CX360 Comments at 6 (stating that "georouting based on county-level location data . . . is sufficiently *imprecise* to protect the identity and privacy interests of help seekers"); Vibrant PN Comments at 5 ("Regarding privacy considerations related to the granularity of location data for text-to-988 georouting solutions, the privacy and security consideration for text messaging and voice calls are nearly identical."); AT&T Reply at 9-10 (arguing that the geographic boundaries for routing 988 text messages should, to the extent possible, align with 988 calls and noting that "wire-center boundaries" meet that requirement).

[84] *See, e.g.*, CX360 Comments at 6 (stating that "county-level location data . . . is sufficiently granular to support effective georouting to the appropriate crisis center"); *see also* CX360 Reply at 12.

[85] *See* Vibrant PN Comments at 3-4; CX360, Inc. Comments, WC Docket No. 18-336, at 6 (filed Apr. 3, 2025) (CX360 PN Comments). The Federal Information Processing Series (FIPS) codes are maintained and assigned by the Census Bureau to identify geographic areas. *See* U.S. Census Bureau, American National Standards Institute (ANSI), FIPS, and Other Standardized Geographic Codes, U.S. Dep't of Com. (May 1, 2023), https://www.census.gov/library/reference/code-lists/ansi.html.

simply connect a help seeker to the nearest crisis contact center based on cell phone tower data."[86] We anticipate that our broad definition of "georouting data" will give covered text providers flexibility to implement technical solutions that use different granularity of data, such as wire center or FIPS code boundaries provided that such data does not reveal the precise location of the handset.

28. We disagree with the Boulder Regional Emergency Telephone Service Authority's (BRETSA) contention that more precise location information should be transmitted with 988 text messages.[87] The record reflects significant support for georouting solutions that provide geographic routing information to the Lifeline without identifying a text user's precise location.[88] We are also persuaded by commenters that 988 text users have unique privacy expectations as compared to 911 users,[89] and find that any text-to-988 georouting solution must maintain text users' confidence that their precise location information will remain confidential when communicating with the Lifeline.[90] Additionally, as discussed below, we decline to take specific action at this time to extend text-to-988 georouting requirements to the Lifeline's specialized service lines.[91] We believe that this approach should alleviate the concern raised by the Electronic Privacy Information Center and Wildflower Alliance (EPIC-WA) that text users contacting the Lifeline's specialized service lines may be at a greater risk of being personally identified.[92]

29. Although we agree with the Conservative Political Action Conference Foundation's Center for Regulatory Freedom (CPAC) that maintaining the privacy of 988 callers and text users has been integral to the Lifeline's ability to serve as a "safe and dependable resource,"[93] the requirements we adopt today will not obligate covered text providers to engage in "approximate geolocation reporting" or undermine Americans' trust in the integrity of the Lifeline.[94] The rules we adopt today do not require covered text providers to transmit more precise geolocation data with 988 text messages, but rather aggregated location data, such as county-level information, that maintains text users' privacy by not identifying the precise location of the text users' handset.

30. We also disagree with those commenters that argue georouting data is not sufficiently

[86] Vibrant PN Comments at 3.

[87] *See* BRETSA PN Comments at 3 (arguing that "[g]eorouting 988 calls based upon the location of the tower over which a CMRS system received the call does not provide sufficient resolution"); *see also id.* at 4-6.

[88] *Supra* note 77 (comments supporting privacy).

[89] *See, e.g.*, NAMI Comments at 3 ("One of the unique and valued features of 988 is the option to remain anonymous, if desired."); CX360 PN Comments at 9 (stating that "the use of precise location data is *not* appropriate in the 988 context because help seekers' privacy expectations differ when contacting the 988 Lifeline"); Vibrant PN Reply at 3 ("When help seekers reach out to the 988 Lifeline, they expect a level of confidentiality that is not typically associated with 911 emergency services.").

[90] *See, e.g.*, NAMI Comments at 2-3 ("Establishing trust in the 988 Lifeline is essential to ensuring that people in crisis are not discouraged from using the service when they need it most."); Reimagine Crisis PN Comments at 2 (same); VON Reply at 4-5.

[91] *See infra* para. 48 (discussing specialized services).

[92] *See* EPIC-WA Comments, WC Docket No. 18-336, at 8 (filed Apr. 3, 2025) (EPIC-WA PN Comments) (arguing that "[c]ounty-level codes may provide adequate anonymity, unless there are additional methods by which texter data might be sorted"). While EPIC-WA provides a cautionary example of a texter in a small county "contacting a hotline focused on LGBTQ+ specific needs," we note that, as of July 17, 2025, the 988 Lifeline "no longer silo[s] LGB+ youth services" through a "Press 3 option." SAMHSA, *SAMHSA Statement on 988 Press 3 Option* (June 17, 2025), https://www.samhsa.gov/about/news-announcements/statements/2025/samhsa-statement-988-press-3-option.

[93] *See* CPAC Reply at 7 (stating that "the sanctity of privacy . . . has allowed the 988 Lifeline to remain a safe and dependable resource for individuals in mental health crisis").

[94] *See id.* at 2, 7.

granular to improve the routing of 988 text messages.[95] While some commenters identify alternatives to georouting that may connect text users with local resources,[96] we find that generating aggregated location information using cell-based technology will significantly improve the routing of 988 text messages and help connect text users to local resources in a timely manner while protecting user privacy.[97] We disagree with BRETSA's inference that the benefits of improved routing are limited to instances in which individuals require emergency services intervention.[98] As discussed above, georouting provides numerous benefits to individuals contacting 988, including those that do not require dispatch of emergency services.[99] Likewise, we acknowledge CPAC's contention that geolocation could alleviate routing errors more effectively than georouting data, as well as its concerns about "further regulations aimed at correcting misrouting."[100] As CPAC states, however, sharing a 988 text user's precise location data raises significant privacy concerns.[101] We agree, and therefore the definition of georouting data we adopt today precludes the transmission of more precise location data for 988 text messages.

2. Providing Georouting Data

31. We next adopt the Commission's proposal to require covered text providers to provide georouting data, when available, to the Lifeline Administrator, sufficient to allow routing of the message to the appropriate crisis center based on the geographic area where the handset is located at the time the covered 988 text message is initiated.[102] As discussed below, we find that this approach strikes the right balance between ensuring that covered text providers support georouting for 988 text messages and allowing sufficient flexibility to develop and implement solutions that maximize their network capabilities.

32. *Technical Considerations.* To address technical limitations raised by the record, we require covered text providers to provide georouting data for 988 text messages to the Lifeline Administrator only when such data is available.[103] We agree with CTIA and Intrado that limiting this requirement to providing georouting data "when available" is necessary to account for technical

[95] *See, e.g.*, BRETSA PN Comments at 3; CPAC Reply at 4.

[96] *See, e.g.*, Crisis Text Line Comments, WC Docket No. 18-336, at 3 (filed June 28, 2024) (Crisis Text Line June 28, 2024 Comments) (noting that text users can either consensually provide information about their area, or that responders can contact emergency services in the jurisdiction of the phone's area code to determine the location of users); CPAC Reply at 6 (arguing that text users "should be given the option of manually entering their zip code while on the phone with 988 Lifeline personnel"); *id.* at 7 (supporting an alternative approach to georouting solutions that focuses on providing local crisis centers with "resources necessary to allow them to welcome calls and texts directly").

[97] *See, e.g.*, ABHW Comments at 1 ("Establishing a mandate that ensures 988 texts are routed by location rather than area code will enable better access to critical local crisis counselors and resources."); Accessibility Organization Comments at 3 ("Effective georouting enables text messages to be directed to the most appropriate crisis center, ensuring equitable and effective access to crisis services so that individuals in need can receive faster and more appropriate support."); Vibrant PN Comments at 4; Vibrant Jan. 16, 2025 *Ex Parte* at 4 ("Instituting georouting for text messages will ensure that individuals who reach out via text can access localized, timely support.").

[98] BRETSA PN Comments at 3-4.

[99] *See supra* Section III.A.

[100] *See* CPAC Reply at 4-6.

[101] *Id.* at 7 (arguing that geolocation "would completely remove the user's right to privacy, undermining the confidentiality that has made the 988 Lifeline so accessible and helpful for so many people").

[102] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11867, para. 85.

[103] *Id.*

challenges and to enable covered text providers to optimize their current technology and networks.[104] For instance, several commenters raise concerns about the technical feasibility of transmitting georouting data with text messages originated when a text user is roaming.[105] While we acknowledge the public benefits of supporting georouting for all 988 text messages, we believe that limiting the requirement to providing georouting data "when available" strikes the appropriate balance between facilitating access to the Lifeline's resources and allowing providers the flexibility to address technical challenges.

33. The record indicates that, in the event that georouting data is unavailable, the Lifeline will route text messages based on the area code of the user's device.[106] We agree with CX360 that, while "area code-based routing is imperfect," this "alternative routing" process will help ensure that text users receive assistance even if the closest crisis center cannot be identified or reached.[107] Additionally, we find that this approach provides parity with the Commission's rules for voice-to-988 georouting,[108] which helps minimize confusion for both providers and individuals texting the 988 Lifeline.[109] We also believe that this approach alleviates record concern about scenarios where covered text providers are incapable of providing georouting data.[110]

34. *Supporting Industry Efforts to Implement Text-to-988 Georouting.* The rules we adopt today provide a flexible, technology-neutral framework that enables covered text providers to make industry-based determinations on implementing georouting solutions for 988 text messages.[111] The record reflects that nationwide wireless providers, the current Lifeline Administrator, and its vendors are actively collaborating to develop georouting solutions for 988 text messages.[112] As the Lifeline

[104] CTIA Comments at 7 (arguing that "[l]imiting any obligation to provide georouting data 'when available' accounts for technical limitations and will enable covered text providers the ability to promptly maximize their current technology and network configurations"); Intrado Reply at 9 (agreeing with CTIA); *see also* AT&T Reply at 9 (arguing that any rules "should require georouting data to be sent with 988 text messages only 'when available'").

[105] *See* CTIA Comments at 6-7 (arguing that "similar to texts to 911 and wireless 988 voice calls, covered text providers may not be able to provide location information for text messages to 988 that originate while roaming"); CX360 Comments at 9, n.24 (stating that "roaming may impact the ability for CX360's system to georoute texts to 988"); *see also* CTIA Reply at 8; Intrado Reply at 9.

[106] CX360 Comments at 9 & n.24 (explaining that "in instances where an individual's location data is not available because the individual is roaming, CX360 has a backup solution that relies on the user's area code").

[107] *Id.* at 11; *see also 988 Georouting Second Further Notice*, 39 FCC Rcd at 4456, para. 21 (stating that it is paramount to connect individuals "with critical, life-saving help even if the closest crisis center cannot be identified or reached"). We believe that the Lifeline's default routing mechanism also alleviates record concern about incorporating "fallback mechanisms or alternative data sources" in our definition of georouting data. *See* Accessibility Organizations Comments at 7.

[108] *988 Georouting Third Report and Order*, 39 FCC Rcd at 11848-49, paras. 42-43.

[109] *See supra* note 46 (commenters supporting the importance of parity).

[110] *See* CPAC Reply at 3 (arguing that the Commission is "unable to detail how georouting for covered 988 text messages will be implemented, especially if the covered text provider is incapable of providing georouting data").

[111] CTIA Comments at 7-8 (urging the Commission to "continue its successful approach of aligning its requirements with the consensus-based solutions identified by wireless providers and the Lifeline in order to ensure that 988 enhancements can promptly benefit as many people in crisis as possible"); *see also, e.g.*, Vibrant Comments at 6 (stating that "a uniform standard developed in partnership with SAMHSA and the Administrator would enable the 988 Lifeline to better serve individuals in crisis"); AT&T Reply at 7 (agreeing with CTIA); CX360 Reply at 1 (arguing that the Commission should allow efforts to develop an industry-based approach "to continue without the constraints of regulatory mandates").

[112] *See* CTIA Comments at 3 ("CTIA and its member companies are working diligently with the Lifeline Administrator towards identifying and developing solutions that can provide georouting data for text-to-988."); *see also, e.g.*, CX360 Comments at 2-3; AT&T Reply at 1-2; CTIA Reply at 3; T-Mobile PN Comments at 3; Vibrant PN Comments at 3-4.

Administrator notes, this process will help "identify the necessary routing requirements for text messaging and explore solutions that protect the privacy of help-seekers."[113] And, as CTIA observes, aligning our requirements with industry-based solutions developed by stakeholders and the Lifeline Administrator is integral to the successful, timely implementation and ongoing improvement of the 988 Lifeline.[114]

35. We find that a flexible approach to 988 text georouting is essential to support further innovation, as urged by many commenters in this proceeding. As several commenters observe, allowing providers flexibility to use technically feasible options that are compatible with the Lifeline's system is "appropriate, particularly given the ongoing technological development in this area."[115] The Competitive Carriers Association (CCA) adds that a technology-neutral framework "offers providers the flexibility to adopt the solutions that work best for their networks and promote[s] the improvement of those solutions over time."[116] We also share concerns that setting prescriptive requirements may compel providers to rely on underdeveloped solutions and potentially discourage further innovation to improve georouting for 988 text messages.[117] As such, we decline at this time to adopt more prescriptive requirements for how covered text providers must develop the capability and provide georouting data to the Lifeline.[118]

36. We also agree with CCA that allowing "robust industry-led development of a standardized and scalable approach to georouting data for text messages" will better serve non-nationwide providers.[119] The compliance deadlines we adopt below provide ample time for both nationwide and non-nationwide providers to implement and develop a georouting solution for 988 text messages, thereby minimizing compliance burdens.[120] We strongly encourage non-nationwide covered text providers to collaborate with SAMHSA and the Lifeline Administrator in developing and testing georouting solutions for 988 text messages.[121]

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[113] Vibrant PN Comments at 4.

[114] CTIA Comments at 5.

[115] CCA Comments at 4; CX360 Reply at 5 & n.12; *see also* Vibrant PN Reply at 3 (supporting the same conclusion).

[116] CCA Comments at 4.

[117] *See, e.g.*, CCA Comments at 3 (arguing that mandating georouting for 988 text messages prematurely "risk[s] impeding ongoing innovation by locking providers into underdeveloped solutions"); CX360 Comments at 8 (stating that "[t]he public interest would not be served if service providers are rushed to implement solutions that are inadequate"); Intrado Comments at 3 (arguing that any text-to-988 georouting rules "should remain as technology neutral as possible to afford flexibility for a range and evolution of technical solutions"); CX360 Reply at 4 (asserting that "imposing text-to-988 georouting regulations . . . prior to the completion of the ongoing collaborative efforts to develop an appropriate solution, could stifle innovation in the future"). To further facilitate efforts to make an industry-based determination, as discussed below, we provide a longer compliance period for both nationwide and non-nationwide providers than proposed in the *988 Georouting Third Further Notice*. *See infra* Section III.D, Implementation Time Frame.

[118] CX360 Comments at 4 (arguing that "prescriptive regulatory mandates are not the appropriate means to achieve" the goal of "parity for voice calls and text messages to 988"); *id.* at 15-16 (urging the Commission to "afford 988 service providers the flexibility to continue developing text-to-988 georouting solutions without prescriptive rules so that the 988 Lifeline can be even more useful to help seekers"); AT&T Reply at 5-6 (agreeing with CX360); CX360 Reply at 3 ("Several commenters agree that adopting prescriptive regulatory mandates for text-to-988 georouting is unnecessary or at least premature at this time.").

[119] CCA Comments at 3; *see also* CX360 Reply at 4 (agreeing with CCA).

[120] *See infra* Section III.D, Implementation Time Frame.

[121] *See* RWA Comments at 2 (arguing that "988 georouting solutions remain untested for small rural non-nationwide CMRS providers").

37. We conclude, however, that purely voluntary implementation undermines our goal of ensuring that the clear public benefits of georouting for 988 text messages are realized in a timely manner. For example, some wireless providers and industry commenters argue that text-to-988 georouting requirements are unnecessary at this time because national systems, rather than local crisis centers, handle most 988 text messages due to infrastructure limitations.[122] We disagree. The record demonstrates that a significant number of local crisis centers are currently able to receive texts to 988.[123] Moreover, the Lifeline Administrator indicates that this number is likely to grow in the future as more local crisis centers add text-to-988 capability.[124] In any event, text-to-988 capability does not need to be universally available among the Lifeline's more than 200 local crisis centers in order to realize the significant benefits of georouting for 988 text messages, including improved access to local resources and counselors who may better understand unique community stressors.[125] Notably, the current Lifeline Administrator does not dispute the need for us to adopt an affirmative requirement at this time.[126] We therefore find that the benefits of georouting 988 text messages to those local crisis centers that are capable of receiving such messages easily support the commonsense, non-prescriptive requirements we adopt today.[127]

38. We also decline to adopt the Rural Wireless Association's (RWA) suggestion to allow small rural non-nationwide providers to implement georouting solutions for 988 text messages on a voluntary basis.[128] While we acknowledge that non-nationwide providers may face operational limitations when implementing georouting solutions for 988 text messages, we offer flexibility and additional compliance time to non-nationwide providers to minimize such burdens.[129] Additionally, several commenters emphasize the importance of implementing georouting solutions for 988 text messages to improve access to the Lifeline's critical intervention services for rural Americans.[130] We find the benefits of ensuring that all Americans have improved access to the Lifeline's lifesaving resources support applying our requirements to all covered text providers, including small rural providers. Our approach also promotes parity between 988 calls and texts, ensuring consistent and predictable level of service across communication modes while reducing potential confusion for individuals in distress.[131]

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[122] *See, e.g.*, Comtech Reply at 3 (arguing that "further technological innovation and standardization is necessary," due in part to "the low level of Lifeline crisis centers capable of receiving text-to-988"); CTIA Reply at 4-5 (arguing that "not all crisis centers . . . support text messaging capabilities" and that "adopting rules to mandate georouting for text-to-988 is not necessary and would be premature"); VON Reply at 1-2 (supporting the same conclusion); *see also* Crisis Text Line June 28, 2024 Comments at 2; CTIA Reply, WC Docket No. 18-336, at 11 (rec. July 29, 2024) (CTIA July 29, 2024 Reply).

[123] *See* Vibrant Comments at 3 (noting that "[t]here are approximately 77 local crisis contact centers currently in the network that provide support to local help seekers through text messaging").

[124] *See id.*

[125] *See supra* note 31 (record support for benefits of local resources/counselors).

[126] *See* Vibrant Comments at 6; Vibrant PN Reply at 1, 5.

[127] *See* Vibrant Comments at 3 ("Vibrant believes that [the] growing number of local crisis contact centers that are able to respond to local texts is sufficient to begin the georouting of text messages."); AT&T Reply at 9-10 (arguing that "georouting for 988 text messages should align as closely as possible to how 988 calls are routed such that eventually they are routed consistently and thus deliver a predictable level of service relative to 988 calls").

[128] RWA Comments at 1.

[129] *See supra* Section III.D, Implementation Time Frame.

[130] *See supra* note 42 (comments supporting the importance of georouting for rural Americans).

[131] *See, e.g.*, Accessibility Organizations Comments at 3 ("Implementing georouting for [text] messages reinforces the Lifeline's commitment to equitable access for all individuals in crisis, regardless of the communication method they use."); NAMI June 28, 2024 Comments at 4 ("If georouting is implemented for calls but not text, there is likely to be confusion among people contacting 988 for help, which creates further distrust among potential help-seekers.").

39. We are unpersuaded by CTIA's argument that we should not extend georouting requirements to 988 text messages based on the Commission's actions in the *911 LBR Report and Order*.[132] Although the record in this proceeding indicates that georouting solutions for 988 text messages may require some network and infrastructure changes,[133] it does not raise the same concerns found in the context of 911 location-based routing about extensively retrofitting legacy SMS networks.[134] The industry-based text-to-988 georouting solution endorsed by CX360 also supports the conclusion that industry stakeholders have already developed some standards for implementing text-to-988 georouting solutions.[135] Further, georouting solutions for 988 text messages and location-based routing for 911 require different granularity of location data, and different entities perform the routing functions. Specifically, 911 location-based routing uses precise location data on the user's device to route 911 calls to the appropriate destination,[136] whereas georouting solutions for 988 text messages use less granular aggregated location data, such as county-level FIPS codes or wire center boundaries.[137] Moreover, in the context of 911, providers determine the routing destination based on the precise location information of a device,[138] whereas the Lifeline Administrator retains responsibility for routing 988 text messages to individual crisis centers using the georouting data provided by the covered text providers.[139] We therefore find that the technical differences between the routing methodologies and the record received in this proceeding distinguish 911 location-based routing requirements from georouting for 988 text messages.

40. We also disagree with those commenters that argue it is premature for the Commission to consider adopting text-to-988 georouting requirements.[140] We believe that enabling georouting for 988 text messages to improve service for text users should not be unduly delayed, and that the Commission's

[132] CTIA July 29, 2024 Reply at 11; *see also* CTIA Comments at 6 & n.13. In the *911 LBR Report and Order*, the Commission declined to extend location-based routing (LBR) requirements to 911 SMS text messages, both because the industry had not yet developed standards for implementing location-based routing on SMS networks and to avoid requiring providers to retrofit legacy SMS networks. *Location-Based Routing for Wireless 911 Calls*, PS Docket No. 18-64, 39 FCC Rcd 527, 556, para. 56 (2024) (*911 LBR Report and Order*). The Commission also noted that a number of Public Safety Answering Points (PSAPs) were incapable of receiving texts and that the volume of 911 text messages was far smaller than the volume of 911 voice calls. *Id.* at 559, para. 61.

[133] *See, e.g.*, Vibrant Jan. 16, 2025 *Ex Parte* at 3 (stating that "flexibility is needed as providers develop georouting solutions that work within their varying networks").

[134] *911 LBR Report and Order*, 39 FCC Rcd at 559, para. 61. *See, e.g.*, CTIA Comments at 2 (arguing that "technology-neutral and flexible regulations . . . enable providers and the Lifeline to maximize current technology and network configurations"); *id.* at 7 (noting that "[l]imiting any obligation to provide georouting data 'when available' accounts for technical limitations and will enable covered text providers the ability to promptly maximize their current technology and network configurations").

[135] CX360 PN Comments at 5 (arguing that "CX360's most recent iteration of its text-to-988 georouting solution has gained broad consensus"); *see also, e.g.*, CTIA Comments at 2 (stating that "wireless providers are steadfastly working with the Lifeline to evaluate technological approaches and identify a consensus path to provide the Lifeline with georouting data for text-to-988"); T-Mobile PN Comments at 3 (noting that T-Mobile is "working with other stakeholders to develop a solution that can convey FIPS-based location information with text messages to 988 via an Application Programming Interface").

[136] 47 CFR § 9.3 ("Location-based routing").

[137] *Supra* Section III.C.1 (discussing aggregation).

[138] *911 LBR Report and Order*, 39 FCC Rcd at 593, para. 3 ("With location-based routing as implemented under the Commission's rules, CMRS providers will use precise location information to route wireless 911 voice calls and [real time text (RTT)] communications to 911 to the appropriate [PSAP].").

[139] *Infra* para. 47 (discussing the importance of centralized routing).

[140] *See, e.g.*, CCA Comments at 1-3, 5; CTIA Comments at 3-7; CX360 Comments at 2-3; RWA Comments at 5-6; AT&T Reply at 4, 7-8; CTIA Reply at 3-5; CX360 Reply at 1, 3; VON Reply at 1, 3.

affirmative and timely decision to require implementation (with flexible, technology-neutral parameters) will minimize confusion for both providers and individuals texting 988.[141] Adopting rules will also provide clarity and regulatory certainty for covered text providers, encouraging progress in developing and implementing text-to-988 georouting solutions. Given the clear public interest benefits of supporting georouting for 988 text messages, we find that deployment and implementation of georouting solutions for 988 text messages should not be optional.

41. *Technological Feasibility.* We find that implementing georouting for 988 text messages is technologically feasible for nationwide and non-nationwide covered text providers. In the *988 Georouting Third Further Notice*, the Commission sought comment on technical challenges that may arise in providing georouting data with covered 988 text messages, noting that there was disagreement in the record regarding the difficulty of implementing text-to-988 georouting solutions.[142] While we recognize that there are technical differences between georouting solutions for 988 calls and text messages,[143] the record indicates that at least one technically feasible approach exists today for text-to-988 georouting.[144] Therefore, although the work to develop these solutions is ongoing, we find that deploying georouting solutions for 988 text messages is feasible for both nationwide and non-nationwide covered text providers within the compliance time frames we adopt in this *Fourth Report and Order*.

42. As discussed above, the nationwide wireless providers, the current Lifeline Administrator, and other industry stakeholders are actively collaborating to develop an industry-based georouting solution for 988 text messages that maintains text users' privacy.[145] For instance, under the approach endorsed by CX360, covered text providers route covered text messages to the Lifeline as required under the Commission's existing rules without georouting data.[146] The Lifeline's interactive voice response (IVR) system[147] requests georouting data from the providers via a "secure, industry-standard application programming interface" only when the 988 text user does not request specialized services.[148] To protect privacy, the covered text providers aggregate location data using county-level FIPS code boundaries,[149] which is similar to the aggregation process used by some wireless providers for voice-to-988 georouting solutions.[150] The record indicates that nationwide providers are already offering and supporting the use of network application programming interfaces.[151] Moreover, while the

[141] *Supra* para. 15 (discussing record support for parity).

[142] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11866, para. 83.

[143] *See, e.g.*, Vibrant Comments at 5 ("[W]e anticipate data reference systems to differ for voice and text on the operator side."); *id.* (stating that "it is essential that the proposed georouting mandate allows for flexibility due to operators' varying capabilities"); AT&T Reply at 2 ("Technical solutions adopted to support georouting for 988 calls will likely not translate directly to 988 text messages, which requires a separate effort."); CTIA Reply at 4 (arguing that "[t]he record also makes clear that there are 'fundamental differences' in the routing process for voice calls and text messages that require further evaluation"); *see also* CCA Comments at 1-3; CTIA Comments at 3-4; CX360 Comments at 2; Comtech Reply at 4, n.11; CPAC Reply at 3; CX360 Reply at 16.

[144] *See, e.g.*, CX360 PN Comments at 6-8.

[145] *Supra* Section II.

[146] *See* 47 CFR § 52.201.

[147] The Lifeline's IVR system allows 988 callers and text-users to select specialized service lines, such as the Veterans Crisis Line. *See* CTIA PN Comments at 4; CX360 Reply at 7.

[148] CX360 PN Comments at 5-7.

[149] *Id.* at 6-7.

[150] *See 988 Georouting Third Report and Order*, 39 FCC Rcd at 11846-47, para. 39.

[151] CX360 Reply, WC Docket No. 18-336, at 8-9 & n.37 (filed Apr. 18, 2025) (CX360 PN Reply); *see also* T-Mobile PN Comments at 3 (stating that T-Mobile is "working with other stakeholders to develop a solution that can convey FIPS-based location information with text messages to 988 via an Application Programming Interface").

"discovery phase" to develop an industry-based georouting solution is ongoing, the Lifeline Administrator "anticipates that it is technologically feasible for both nationwide and non-nationwide CMRS providers to identify georouting solutions that work best with their existing networks."[152]

43. We are not persuaded by the arguments advanced by Intrado that the solution endorsed by CX360 raises privacy concerns due to the Lifeline querying for location data.[153] Intrado argues that text-to-988 georouting solutions must avoid designs that allow the Lifeline to query providers for location information to protect text users' privacy, adding that "wireless providers should remain in full control of user location information with a push of only coarse location."[154] As CX360 states, however, under its proposed approach, the Lifeline's system would only have access to FIPS codes from wireless providers.[155] AT&T adds that the Lifeline Administrator prefers solutions that provide georouting data only with a user's initial text message in a single conversation series, and that such solutions will likely require the Lifeline to query providers for georouting data.[156] We also note that there is support in the record for including georouting data with the text user's initial message to protect privacy by avoiding the transmission of precise location information to downstream parties.[157] Moreover, we require covered text providers to aggregate location data in order to maintain the privacy interests of 988 text users.[158] We thus reject Intrado's inference that, under the approach suggested by CX360, the "Lifeline Administrator could have access to the location for every device on the carrier's network."[159]

44. *Text-to-911-Based Georouting Solutions.* We decline, at this time, to expand the scope of our requirements to georouting solutions that utilize Text Control Centers (TCC) as intermediaries between covered text providers and the Lifeline, as proposed by some commenters.[160] As the

[152] Vibrant Comments at 6 ("While Vibrant has not yet conducted a discovery phase, we do anticipate that it is technologically feasible for both nationwide and non-nationwide CMRS providers to identify georouting solutions that work best with their existing networks.").

[153] Intrado Comments, WC Docket No. 18-336, at 4-5 (filed Apr. 3, 2025) (Intrado PN Comments) (arguing that "to arrive at a solution that protects user privacy, the critical factor is avoiding a solution design that allows the Lifeline to query/pull mobile location information").

[154] *Id.*

[155] CX360 PN Comments at 6-7 (explaining that "the 988 Lifeline's IVR would use a secure, industry-standard application programming interface to request and receive the FIPS code from the wireless carrier" and that "the 988 Lifeline's IVR would only have access to coarse location data from FIPS codes").

[156] AT&T Reply at 10; *but see* Intrado PN Comments at 6 (arguing that a Text Control Center (TCC) "has the capability to restrict insertion of coarse location to only the first message").

[157] *See, e.g.*, CX360 Comments at 7 (urging the Commission to "ensure that the data is incorporated as soon as possible into text data flows" and arguing that "[d]oing so would allow carriers and other downstream parties to avoid having to mask more precise location data"); CX360 PN Comments at 9.

[158] *Supra* Section III.C.1 (discussing aggregation).

[159] Intrado Comments at 5-6 (arguing that "without the TCC performing [queries for location], the Lifeline Administrator could have access to the location for every device on the carrier's network").

[160] *See, e.g.*, *id.* at 8-9; Comtech Reply at 2-3. A Text Control Center (TCC) is a controlling functional element specified in a relevant standard for text-to-911. ATIS and Telecommunications Industry Association (TIA), Joint ATIS/TIA Native SMS/MMS Text to 9-1-1 Requirements and Architecture Specification – Release 2 at section 7.2.1 (May 2015), https://webstore.ansi.org/standards/atis/std110 (ATIS/TIA J-STD-110.v002). The TCC has the responsibility to "(1) convert various protocols and act as a gateway; (2) request location that may be used for routing; (3) request routing instructions; and (4) initiate a dialogue with the [Public Safety Answering Point (PSAP)] through the appropriate interworking function of the TCC. When the TCC receives an initial text message, it obtains location from the [location server]. It then uses that location to obtain routing instructions from the [routing server]. Then, the TCC converts the text message to an appropriate protocol and initiates a dialogue with the PSAP (via the emergency services network) through the appropriate interworking function of the TCC." *Id.*

Commission emphasized in the *988 Georouting Third Further Notice*, SAMHSA, the agency with oversight of the Lifeline Administrator, must ultimately determine the routing data that it will deem acceptable for the Lifeline's system to process.[161] In its comments, the current Lifeline Administrator strongly advises against georouting solutions that leverage text-to-911 infrastructure due to concerns about required modifications to the Lifeline's network and unknown costs and implementation time.[162]

45. While several commenters argue that text-to-911-based georouting solutions could provide benefits for text-to-988 georouting,[163] we are convinced by the record that adopting such proposals at this time would be contrary to our goal of ensuring that georouting is available for 988 text messages without delay. For example, AT&T and CX360 argue that georouting solutions that utilize TCCs introduce an unnecessary "point of failure"[164] and require modifications of the Lifeline's system.[165] The record also raises concerns that using a system designed for 911 in the context of 988 may have a chilling effect due to differing privacy expectations.[166] Several commenters also argue that georouting solutions based on text-to-911 infrastructure may compromise privacy due to access to, and potential inadvertent disclosure of, precise location information.[167] Based on our review of the record, and given the concerns raised by commenters regarding implementation delays and the potential chilling effects associated with using geolocation data in the context of 988,[168] we find that expanding our requirements to allow text-to-911-based georouting solutions is unwarranted at this time. Nevertheless, we encourage all industry stakeholders and the Lifeline Administrator to actively collaborate on the development and improvement of georouting solutions that protect privacy and are compatible with the Lifeline's

[161] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11867-68, para. 85.

[162] Vibrant PN Comments at 4 ("Due to the limitations of text-to-911 infrastructure and the need for network modifications, we strongly advise against using a georouting solution that directly depends on this system.").

[163] *See, e.g.*, Comtech Reply at 2-3; Intrado Reply at 2-3.

[164] AT&T Reply at 3 (stating that "the proposal to use a [TCC] to receive and send georouting data to the Lifeline with the 988 text message would introduce an unnecessary point of failure"); CX360 PN Comments at 12 (agreeing with AT&T). *But see* Intrado PN Comments at 6 (arguing that "TCCs . . . are carrier grade, georedundant, and fault tolerant with a proven 'five nines' track record of availability.").

[165] AT&T Reply at 10 (discussing text-to-911-based georouting solutions and stating that "significant development work would be needed to modify that design to accommodate the Lifeline's needs"); CX360 Reply at 12 (urging the Commission to "reject proposed solutions modeled on text-to-911 georouting that would require redesigning the 988 Lifeline"); Intrado Comments at 6-7 (acknowledging that "the Lifeline and its aggregator would need to modify their systems to decode" a new proprietary parameter within the SMPP message to implement a text-to-911-based georouting solution).

[166] Vibrant PN Reply at 3 ("[T]he georouting solutions under consideration should be designed separately from the text-to-911 infrastructure to preserve the unique privacy expectations of the 988 Lifeline."); *see also* CX360 PN Comments at 9.

[167] *See, e.g.*, CX360 PN Comments at 10 (expressing concern a "TCC may receive *precise* location data from wireless carriers for . . . text messages"); *id.* at 12 (stating that "if a TCC fails to convert precise location information into FIPS codes, the precise location data of a person seeking help from the 988 Lifeline could be inadvertently transmitted throughout the 988 Lifeline network"); EPIC-WA PN Comments at 8 (arguing that Intrado's proposed "dither option for obscuring location data . . . runs the risk of the stripping not occurring").

[168] CX360 PN Comments at 3 (expressing concern that Intrado's proposed text-to-988 georouting solutions could deter help-seekers from using the Lifeline); Vibrant PN Reply at 3 ("[T]he georouting solutions under consideration should be designed separately from the text-to-911 infrastructure to preserve the unique privacy expectations of the 988 Lifeline."); *see also* Accessibility Organizations Comments at 8; LA County DMH Comments at 3; NAMI Comments at 3-4; Reimagine Crisis Comments at 2; NAMI May 5, 2025 *Ex Parte* at 2 (all emphasizing the need to expeditiously implement georouting solutions for 988 text messages).

system.[169]

46. *Direct Routing.* We also decline to adopt proposals that would bypass the Lifeline's initial direct and centralized routing platform.[170] CPAC recommends an alternative approach to georouting solutions that focuses on providing local crisis centers with "resources necessary to allow them to welcome calls and texts directly," arguing that this would improve the routing of 988 contacts while prioritizing confidentiality.[171] The Commission previously concluded that the Lifeline's centralized routing process provides numerous benefits, including faster implementation, reduced routing costs, and improved service.[172] In the *988 Georouting Third Further Notice*, the Commission also declined to seek comment on text-to-988 georouting solutions that would bypass the Lifeline's centralized routing platform.[173]

47. The record reflects significant support for retaining the Lifeline's existing centralized routing structure.[174] In particular, we are persuaded by commenters that the centralized routing system plays a critical role in managing the capacity of crisis centers, routing text messages to the national back-up center, and minimizing technical burdens placed on crisis centers.[175] As the Lifeline Administrator states, the centralized structure facilitates network monitoring to resolve "any potential issues that arise" and helps ensure that text messages are "routed efficiently to the appropriate crisis contact center."[176] CX360 adds that this structure allows the "Lifeline Administrator to balance text volumes within a certain geographic area to minimize response times," helping to connect text users "to the resources they need . . . if a crisis center is particularly busy."[177] CTIA and CX360 similarly agree that proposals to bypass the Lifeline's centralized routing system "should remain outside the scope of this proceeding."[178] Based on our review of the record, and consistent with the Commission's proposal and previous conclusions, we find that the benefits of maintaining the Lifeline's centralized routing system greatly exceed the costs of localized routing at this time.

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[169] Intrado Comments at 2, n.5 (urging the "Lifeline Administrator and carriers to include the TCC operators" in their collaborative efforts to develop a consensus-based text-to-988 georouting solution").

[170] *See* CPAC Reply at 7.

[171] *See id.*

[172] *See 988 First Report and Order*, 35 FCC Rcd at 7395, para. 42; *988 Georouting Third Report and Order*, 39 FCC Rcd at 11842-43, paras. 32-33.

[173] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11865-66, para. 82.

[174] *See, e.g.*, CTIA PN Comments at 3-4 ("Georouting solutions for text-to-988 will also need to support the centralized routing of 988 texts to the Lifeline."); CX360 Comments at 9 ("[T[he centralized routing structure of the 988 Lifeline . . . should be maintained."); AT&T Reply at 2 (stating that "any rules . . . should support centralized routing of 988 text messages by the Lifeline, which is critical to successful routing"); CTIA Reply at 6 ("[T]he record confirms that georouting solutions must retain the central role of the national Lifeline."); CX360 Reply at 2 (expressing support for georouting solutions that "preserve the centralized structure of the 988 Lifeline").

[175] *See, e.g.*, CTIA PN Comments at 4 ("The Lifeline's ability to route text messages to geographically appropriate local crisis centers while retaining the ability to route 988 calls and texts to the national crisis centers in a backup capacity or to specialized sub-networks . . . is both a legal and practical requirement."); Vibrant Comments at 1-2 (describing the Lifeline's process for balancing text volume); CX360 Comments at 9 (stating that "centralized routing allow[s] the 988 Lifeline Administrator to work more directly with SAMHSA to manage the 988 Lifeline and ensure calls are properly handled"); *id.* (asserting that centralized routing "will support the nationwide rollout of text-to-988 georouting once solutions are implemented"); *see also* AT&T Reply at 8-9; CTIA Reply at 6.

[176] Vibrant PN Comments at 4-5.

[177] CX360 Comments at 11.

[178] CTIA Comments at 6 (agreeing that proposals to bypass "the initial direct and centralized routing system of the Lifeline should remain outside the scope for this proceeding"); CX360 Reply at 6 (same).

48. *Specialized Service Lines*. We decline to take specific action to apply our text-to-988 georouting requirements to the Lifeline's specialized service lines. Currently, when an individual texts 988 they are provided options to redirect to specialized service lines, for example, veterans and service members are redirected to text "838255" to reach the Veterans Crisis Line.[179] The record indicates that individual crisis centers have varying capacities to provide specialized services, which complicates the Lifeline's ability to consistently connect text users with an appropriate local crisis center that handles specialized services.[180] Moreover, we believe that our federal partners at SAMHSA and the VA are best positioned to evaluate the benefits and challenges of using georouting data for specialized service lines.

D. Implementation Time Frame

49. In order to support industry efforts to develop efficient and effective text georouting solutions for the Lifeline, we grant nationwide covered text providers a period of 18 months, and non-nationwide covered text providers a period of 36 months, following the effective date of this *Fourth Report and Order* in which to comply with the rules we adopt today. We find that this compliance window appropriately balances the need to expeditiously implement 988 text georouting with the burdens on providers of developing the necessary routing systems. In the *988 Georouting Third Further Notice*, the Commission proposed a uniform implementation deadline of six months from the effective date of the rules.[181] In response, a broad cross-section of stakeholders submitted arguments that additional time would be needed to sufficiently identify and implement georouting solutions for text-to-988.[182] Commenters emphasized that efforts to identify georouting solutions for text-to-988 compatible with the Lifeline's centralized routing system are in the early stages of development and encourage the Commission to allow for its discovery phase, which could take approximately six to 12 months, to develop without regulatory impediment.[183] The Lifeline Administrator also expects to "leverage its established relationship with industry stakeholders to expedite the georouting process for text messages."[184] We anticipate that the flexible and technology-neutral landscape that our rules provide will allow industry stakeholders sufficient time to complete their collaborative efforts to identify an industry-

[179] *See* SAMHSA, *988 Frequently Asked Questions*, *What happens when I text 988?*, https://www.samhsa.gov/mental-health/988/faqs (last visited June 30, 2025). Individuals may also text "AYUDA" to connect with a Spanish-speaking crisis counselor. *Id.*

[180] *See, e.g.*, NAMI Comments at 3 (stating that "specialized services are not currently available through every call center within the 988 Lifeline network, and Veterans Crisis Line calls and texts are answered by the [VA]").

[181] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11868-69, para. 88.

[182] *See, e.g.*, Vibrant Comments at 4 (stating that "Vibrant must assess the current landscape of text message providers in collaboration with stakeholders" to identify solutions and "develop[], validat[e], and verif[y] a proof of concept"); AT&T Reply at 11-13 (arguing that "six months is simply not enough time to perform all the work needed to implement georouting for text messages" and suggesting that "a timeline of 18 months from the effective date of the new rules would better reflect reality").

[183] CTIA Comments at 5-6 ("Georouting solutions for text-to-988 are still in early stages of evaluation and development, and the Commission should ensure that any regulations it considers do not impede wireless providers and the Lifeline's ability to follow this successful playbook and begin providing georouting data with texts to 988 to as many people in crisis as soon as possible."). *See also* CCA Comments at 5-6; CX360 Comments at 2-3; AT&T Reply at 5-6; CTIA Reply at 8-9. The record indicates that the Lifeline Administrator plans to conduct a "discovery" pilot with its vendor and nationwide wireless providers in 2025 to identify, develop, and test text-to-988 georouting solutions, and that it expects the process to take approximately six to 12 months. Vibrant Comments at 4-5. As such, we disagree with the assertion by the Crisis Text Line that we should not adopt rules requiring text to 988 georouting because "the length of time required to develop [such] a georouting solution is [] unknown." Crisis Text Line June 28, 2024 Comments at 3.

[184] Vibrant Comments at 5.

based consensus technical solution for text-to-988 georouting.[185]

50. We therefore agree with those commenters who argue that a longer compliance period than that proposed in the *988 Georouting Third Further Notice* is warranted.[186] In particular, we note that, at the time the Commission adopted the *988 Georouting Third Report and Order*, the nationwide providers were nearing the end of their collaboration with the Lifeline Administrator to develop and test voice georouting solutions. The *988 Georouting Third Report and Order's* expedited implementation time frame for nationwide providers reflected this fact.[187] Here, however, the development of technical solutions for text-to-988 georouting remains in its early stages.[188] We recognize the critical need for time and resources to develop and test solutions, and to account for on-going collaboration amongst the Lifeline Administrator, SAMHSA, providers, and 988 Lifeline vendors. The rules we adopt today allow for this process to proceed while at the same time providing certainty that providers should keep working toward a specific completion date. We therefore grant an extended compliance time frame of 18 months for nationwide providers to reflect the time necessary to complete the discovery phase and subsequently implement its findings.

51. Additionally, commenters called for additional time for non-nationwide providers to account for the fact that the *988 Georouting Third Report and Order* grants those providers until December 2026 to implement georouting for voice calls to 988. For instance, RWA and Intrado emphasize the burden that imposing overlapping compliance deadlines would have on small and rural service providers and recommend the Commission impose a 36-month compliance time frame for non-nationwide providers.[189] We agree with these commenters that the georouting text-to-988 requirement deadline should not be earlier than the deadline for voice-to-988 georouting.[190] To account for non-nationwide providers' on-going efforts to comply with our voice-to-988 georouting implementation requirement, we require non-nationwide providers to comply with our 988 text georouting requirements within 36 months following the effective date of this *Fourth Report and Order*, which, as RWA explains, should allow non-nationwide providers a sufficient compliance period.[191] Based on the record, we are

[185] *See* CTIA Comments at 4 (urging the Commission to "allow wireless providers and the Lifeline to complete their collaborative efforts to identify consensus-based technical solutions before considering any regulatory obligations or timelines for implementation"); CX360 Comments at 5 (urging the Commission to "allow industry to continue exploring . . . options and permit industry to develop an appropriate solution based on the specific needs of the 988 Lifeline and help seekers"); *see also* AT&T Reply at 6; Comtech Reply at 4.

[186] *See, e.g.*, CTIA Comments at 5-7; AT&T Reply at 11; Vibrant Comments at 4-5.

[187] *See, e.g.*, AT&T Reply at 11 ("While wireless providers implemented georouting for 988 *calls* within a six-month timeline, that effort was, as discussed above, the culmination of many months of collaboration. We are not afforded that amount of preliminary work here.").

[188] *See* CX360 Comments at 7-8; Vibrant Comments at 4-5; Vibrant PN Comments at 4; CX360 Reply at 15-17.

[189] RWA Comments at 3 ("The FCC is currently requiring small rural non-nationwide CMRS providers to implement georouting for all 988 calls by December 14, 2026, and requiring small rural non-nationwide CMRS providers to implement location-based routing for all wireless 911 voice calls and real-time text communications to 911 nationwide by May 13, 2026. Having multiple implementation deadlines for routing of 988 and 911 calls and text messages is likely to create confusion among affected CMRS providers and thus create unnecessary burdens for such providers."); *id.* at 4-5 (advocating for the Commission to provide non-nationwide providers with 36 months to comply with text georouting requirements); Intrado Reply at 7-8 (asserting that georouting for text-to-988 implementation requirements should not be earlier than the deadline for georouting 988 voice calls).

[190] Non-nationwide providers must comply with the *988 Georouting Third Report and Order* by December 14, 2026. *WCB 988 Georouting Compliance Dates Public Notice*.

[191] RWA Comments at 4-5 ("Allowing small rural non-nationwide CMRS providers additional time for compliance will afford such CMRS providers sufficient time to absorb the capital and maintenance costs required to implement a 988 georouting solution. Thus, if the FCC adopts the proposed mandate, it should provide small rural non-

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confident that our extended compliance deadline will provide sufficient time for non-nationwide service providers to implement 988 text georouting solutions.[192]

E. Additional Proposals

52. In response to the *988 Georouting Third Further Notice* and *988 Text Georouting Privacy Public Notice* commenters raise a number of other issues related to georouting for 988 texts, including proposals related to privacy and data protection protocols, user consent, direct video calling (DVC), 911-988 interoperability, and cost recovery for service providers. As discussed below, we decline to adopt these proposals in this *Fourth Report and Order*.

53. *Privacy and Data Protection Protocols.* We decline to adopt specific data privacy and cybersecurity requirements with respect to our text-to-988 rules in this *Fourth Report and Order*, beyond adopting rules requiring that georouting data is aggregated so that it cannot identify the precise location of the individual contacting the 988 Lifeline.[193] In the *988 Text Georouting Privacy Public Notice*, the Wireline Competition Bureau noted that privacy and cybersecurity are critical elements in ensuring that individuals contacting the 988 Lifeline have confidence in the program and trust that their identity will remain anonymous.[194] The Bureau therefore sought comment on "any data handling protocols and policies that . . . should be in place to protect the privacy and confidentiality of 988 texters" and on whether to adopt any "additional privacy measures . . . to prevent unintended chilling effects as the Commission continues to enhance the 988 Lifeline through georouting capabilities[.]"[195]

54. The record in this proceeding, including that developed in response to the *988 Text Georouting Privacy Public Notice*, highlights the importance of safeguarding user privacy in developing georouting solutions for texts to 988.[196] As discussed above, we find that our approach to 988 text georouting, which relies on coarse location data rather than the precise location of the user's handset, provides an essential, built-in privacy protection for 988 users.[197] We find that this approach obviates the need for additional data protection requirements, which may provide less reliable privacy protection, or require regulating the conduct of entities outside of the Commission's jurisdiction.[198]

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nationwide CMRS providers 36 months to comply with the proposed georouting mandate for 988 text messages. This additional time will result in better planning, testing, and smoother deployment.").

[192] CTIA Comments at 7 (arguing that given the nascent stage of development, a six-month deadline for georouting text-to-988 could lead to incongruous results for non-nationwide providers).

[193] *See supra* Section III.B & C.

[194] *988 Text Georouting Privacy Public Notice* at 6.

[195] *Id.*

[196] *See, e.g.*, Reimagine Crisis PN Comments at 2 ("Ensuring that 988 can continue to offer confidential services to everyone is critical because . . . nearly two-thirds (63%) of American adults are more likely to contact 988 if they believe their call will be anonymous. Establishing trust in the 988 Lifeline is essential to ensuring that people in crisis are not discouraged from using the service when they need it most."); Vibrant Jan. 16, 2025 *Ex Parte* at 2 ("We agree with several other organizations that any georouting solution for text messages must preserve the confidentiality of the user's location and use only the data necessary for proper routing."). *See also* EPIC-WA PN Comments 7-8; CPAC Foundation's Center for Regulatory Freedom Reply, WC Docket No. 18-336, at 3-4 (filed Apr. 18, 2025) (CPAC PN Reply).

[197] *See supra* Section III.C.1 (discussing aggregation); *see also* BRETSA PN Comments at 5-6 (noting that "*routing* 988 calls or texts based upon the caller's location [would not] appear to violate a caller's privacy" and that "[d]ue to funding requirements, 988 Call Centers must serve a minimum population and corresponding area, and routing of calls should not involve human intervention").

[198] *See* EPIC-WA PN Comments at 8-9 (observing that "the more entities that have access to data, the greater the risk of that data being misused" and arguing "the opportunities to obtain unauthorized access to that data are
(continued….)

55. As several commenters observe, our approach to 988 text georouting mirrors that successfully deployed by the Commission regarding georouting for 988 voice calls.[199] By requiring covered text providers to aggregate location data to a level that does not identify the location of the cell site or base station receiving the 988 text or otherwise identify the precise location of the handset, we ensure that the Lifeline does not receive sensitive location data that may reveal a user's precise location.[200] This "privacy by design" architecture provides significant benefits compared with a system in which more sensitive user data is transmitted by providers to downstream entities that may have varying data security protocols and privacy protections.[201]

56. We also decline to require an informed consent mechanism for georouting text-to-988. While comments submitted by CPAC and EPIC-WA argue that informed consent is necessary and vital to the success of the 988 Lifeline, we conclude that the parameters of our rules effectively minimize the level of personal information transmitted with 988 text messages.[202] Nevertheless, we acknowledge the critical importance of enabling 988 text users to provide meaningful consent and therefore strongly encourage SAMHSA and the Lifeline Administrator to ensure that text users can easily access disclosures about the Lifeline's use of georouting data. We agree that text users contacting the 988 Lifeline should have a high expectation of privacy. We also agree that texters should be made aware of the implications of contacting the Lifeline, particularly as it relates to the collection and use of georouting data.

57. However, we disagree that mandating an informed consent mechanism prior to engaging with the 988 Lifeline will have a net positive impact on individuals seeking help. On the contrary, we find that an informed consent mechanism may have a detrimental impact on the efficacy of the 988 Lifeline and may serve as a barrier to life saving resources.[203] Specifically, we are persuaded by

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significantly reduced by [ensuring that] data collection and sharing can be restricted and aggregated earlier in the process"); *see also* CX360 PN Comments at 4; CX360 PN Reply at 5-6.

[199] *See* Vibrant PN Reply at 2 ("We acknowledge these concerns regarding access to help seekers' physical location. However, similar to the georouting solution for voice calls, we do not anticipate that the georouting solution for text messages will involve access to a user's exact physical location. Instead, Vibrant is likely to employ a georouting solution that directs text messages to the closest crisis center with capacity, based on broader geographic data. This solution will likely use similar or identical boundaries to those developed during the proof of concept for voice calls, which minimizes user-specific data. . . . As with voice calls, where they were previously routed by area code and now through georouting, crisis counselors do not have access to an individual's precise location.").

[200] *See* Vibrant Jan. 16, 2025 *Ex Parte* at 2.

[201] *See* ABHW PN Comments at 2 (arguing that "georouting solutions for text messages should only use [county]-level data, not an individual's precise location" which "will minimize user-specific data collection while connecting texters to their nearest 988 Lifeline crisis center"); BRETSA PN Comments at 5 ("988 caller privacy is ultimately more dependent upon the ethical conduct of the 988 counselors assisting the callers through one-on-one conversations, in which the caller may disclose identifying information as well as medical and mental health information."); EPIC-WA PN Comments at 8-9.

[202] CPAC Reply at 8 (arguing that the Commission should "prioritize the privacy and informed consent of citizens over total statistical accuracy in the coordination and deployment of crisis resources"); EPIC-WA PN Comments at 3-4 (emphasizing the importance of informed consent).

[203] Erin McIntyre Comments at 1 (Express) (questioning the effectiveness of an informed mechanism for minors contacting the 988 Lifeline and whether minors could legally provide consent without guardian approval); CX360 PN Reply at 4-5 ("Although CX360 agrees with EPIC that individuals in crisis are unlikely to use valuable supportive resources if they are afraid that their privacy may be at risk, EPIC goes too far in suggesting that location information should only be provided if express prior consent from a help seeker is obtained. Not only would obtaining express prior consent from each individual help seeker be administratively challenging, but it could also raise concerns and claims related to whether meaningful consent can be provided by an individual experiencing a mental health crisis. Moreover, as CX360 previously explained, county-level FIPS codes, unlike precise location data, are sufficiently imprecise to preserve a help seeker's privacy, obviating the need for express prior consent to collect precise location data.").

arguments submitted by NAMI, a mental health subject matter expert, that the introduction of an express consent mechanism may be confusing to those in crisis, have unintended deterrent consequences, and undermine confidence in the 988 Lifeline.[204] On balance, we conclude that the benefits of georouting texts to 988 far outweigh the attendant privacy risks. As detailed above, our approach to georouting inherently safeguards individual privacy by precluding the transmission by service providers of precise location data.[205] We also note that our decision not to require a specific consent mechanism in connection with the rules we adopt today is consistent with the Commission's approach in adopting voice-to-988 georouting requirements.[206]

58. *Direct Video Calling*. We decline, at this time, to expand the present proceeding to include Direct Video Calling (DVC). Accessibility advocates submitted comments in support of georouting requirements for text-to-988 and advocated for similar requirements for DVC.[207] We agree with comments submitted by the Accessibility Advocates that georouting 988 text messages will ensure individuals who are deaf, hard-of-hearing, or with a speech disability have access to local resources and we conclude such requirements should be implemented without undue delay.[208] In addition to text-to-988, individuals who are deaf, hard of hearing, or have a speech disability may contact the 988 Lifeline through 988 Videophone by dialing 988 with a videophone number or connecting through the 988 web portal.[209] Expanding the scope of our rules to cover DVC may delay implementation of this capability by imposing additional burdens on the Lifeline Administrator and wireless providers as they continue to collaborate on georouting solutions for text-to-988, as well as non-nationwide providers continuing to work to implement georouting solutions for 988 calls. In order to avoid any resulting delays in the adoption of georouting solutions for voice calls and texts to 988, we decline at this time to expand the scope of this proceeding to include DVC.

59. *911-988 Interoperability.* We received comments from BRETSA's urging us to consider issues pertaining to the interoperability between the 988 Lifeline and 911 services.[210] For example, BRETSA argues that integrating 911 and the 988 Lifeline's systems may be necessary to support the transfer of both emergency and non-emergency call and text messages.[211] As discussed above, we decline at this time to extend the scope of our requirements to georouting solutions that leverage text-to-911-based infrastructure and TCCs as intermediaries for routing purposes.[212] While we recognize the

[204] NAMI May 5, 2025 *Ex Parte* at 1 ("Regarding a potential opt-in provision for calls made to the 988 Lifeline by those in crisis may discourage trust that their request for help is not confidential. Primarily, there is a belief that the 988 call center is confidential and protects the privacy of those who seek help without requiring them to opt-in. A potential opt-in provision can be confusing and lead to apprehension about what they may be opting in to.").

[205] *See* BRETSA PN Comments at 5.

[206] *See 988 Georouting Third Report and Order*, 39 FCC Rcd at 11859, para. 68.

[207] Accessibility Organizations Comments at 10-11 (urging the Commission "to expand this proceeding to seek comment on, and adopt a requirement for 988 communications made via Direct Video Calling (DVC). With DVC, people who use American Sign Language (ASL) as their primary means of communication can make video calls over IP-based networks to communicate directly and in real-time with ASL-fluent call takers—in this instance, 988 responders who have been trained to handle the sensitive and urgent calls that come into their centers.").

[208] *See* Accessibility Organizations Comments at 3 ("This step is critical for ensuring parity between text-based and voice-based access to the 988 Lifeline. Effective georouting enables text messages to be directed to the most appropriate crisis center, ensuring equitable and effective access to crisis services so that individuals in need can receive faster and more appropriate support.").

[209] 988 Suicide & Crisis Lifeline, *Deaf, Hard of Hearing, Hearing Loss*, https://988lifeline.org/deaf-hard-of-hearing-hearing-loss/ (last visited June 30, 2025).

[210] *See* BRETSA PN Comments at 4-5.

[211] *Id.*

[212] *See supra* Section III.C.2 (discussing text-to-911-based georouting solutions).

importance of effectively connecting individuals to both 911 and 988, we find that proposals specifically concerning 911-988 interoperability fall outside the scope of this proceeding and therefore we decline to address them further here.

60. *Cost Recovery.* We decline to adopt RWA's proposal that we establish "a funding mechanism that could at least partly subsidize the efforts of small rural non-nationwide CMRS providers."[213] RWA estimates that georouting solutions for 988 calls and text messages could increase monthly subscriber costs for small rural non-nationwide CMRS providers by $4.00 to $5.00 and asserts that one of its members reported receiving an estimate of $2,000 to $2,500 per month for implementation costs.[214] RWA also asserts that Universal Service Fund recipients "must keep their pricing comparable" to nationwide providers, and argues that passing implementation costs onto customers will cause competitive harm to small rural non-nationwide providers.[215] The Commission did not propose any cost recovery mechanisms in the *988 Georouting Second Further Notice* or the *988 Georouting Third Further Notice*.[216] Moreover, as explained below, we find that the benefits of the text-to-988 georouting requirements we adopt today outweigh the costs to covered text providers.[217] To reduce any costs and burdens on non-nationwide providers, we provide non-nationwide covered text providers 36 months to comply with our requirements, as specifically requested by RWA.[218] Additionally, we expect that our flexible, technology-neutral approach will minimize costs and burdens on non-nationwide providers, and we encourage them to collaborate with our federal partners at SAMHSA to identify georouting solutions best suited for their networks.

F. Legal Authority

61. Consistent with our tentative conclusion in the *988 Georouting Third Further Notice*,[219] we find that Title III of the Act and the 21st Century Communications and Video Accessibility Act of 2010 (CVAA) provide authority to adopt the rules we promulgate today. We note that no commenter questioned this analysis.

62. As the United States Supreme Court has long recognized, Title III grants the Commission a "comprehensive mandate" regarding regulation of spectrum usage,[220] and courts have routinely found that Title III provides the Commission with "broad authority to manage spectrum . . . in the public interest."[221] We find that requiring CMRS providers to implement georouting for 988 text messages will likely accrue significant public interest benefits by connecting text users with more localized public safety and counseling resources that could save lives.[222] Therefore, we conclude that Title III provides sufficient authority for the text-to-988 georouting rules we adopt today with respect to CMRS providers.

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[213] RWA Comments at 5.

[214] *Id.* at 3 & n.14.

[215] *Id.* at 3-4.

[216] *See generally 988 Georouting Second Further Notice*, 39 FCC Rcd 4443; *988 Georouting Third Further Notice*, 39 FCC Rcd 11823.

[217] *See infra* Section III.G, Benefits and Costs.

[218] RWA Comments at 4-5.

[219] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11869, para. 90 (citing *Text-to-988 Second Report and Order*, 36 FCC Rcd at 16933, para. 54 (citing 47 U.S.C. §§ 303(b), 303(r), 307, 309(a), 316(a)).

[220] *See Nat'l Broad Co. v. United States*, 319 U.S. 190, 219 (1943).

[221] *See, e.g.*, *Cellco Partnership v. FCC*, 700 F.3d 534, 537, 541 (D.C. Cir. 2012) (upholding the Commission's authority to rely on Title III provisions to impose data roaming rules and acknowledging that Title III provides the Commission "broad authority to manage spectrum . . . in the public interest").

[222] *Infra* Section III.G, Benefits and Costs.

63. We also find that the CVAA provides authority to require interconnected text providers to implement georouting for 988 text messages. The CVAA grants us authority to adopt "other regulations . . . as are necessary to achieve reliable, interoperable communication that ensures access by individuals with disability to an Internet protocol-enabled emergency network, where achievable and technically feasible."[223] The Commission previously concluded in the *Text-to-988 Second Report and Order* that the 988 Lifeline constitutes an "emergency network" under the CVAA, and that text-to-988 provides access to emergency services for individuals with disabilities, including those with hearing or speech disabilities.[224] We find that georouting for 988 text messages will further improve access to the Lifeline for people with disabilities. As the Accessibility Organizations argue, text-to-988 georouting will "advance access to emergency services for people who are deaf, hard of hearing, and speech-disabled."[225] As explained above, the record demonstrates that implementing the text-to-988 georouting requirements adopted in this *Fourth Report and Order* will be both achievable and technically feasible for covered text providers.[226] We therefore conclude that the CVAA provides additional authority for the rules we adopt today, and the record reflects agreement with our analysis.[227]

G. Benefits and Costs

64. We find that the benefits of text-to-988 georouting are far in excess of expected implementation costs. We estimate that the suicide mortality reduction benefits alone exceed the industry-wide implementation costs of one solution identified in the record by a factor of three. This estimate does not include the additional benefits of reduced hospitalizations and emergency room visits, and improved quality-of-life from the impact of our rules on a reduction in suicide attempts, nor the unquantifiable benefits of sparing families and communities from the trauma of losing their loved ones. Below we discuss the expected benefits and costs of our rules.

65. *Benefits.* In the *988 Georouting Third Further Notice*, we estimated that text-to-988 might generate a modest mortality-risk reduction of 0.28 youth suicides annually, for which Americans would collectively be willing to pay $3.5 million annually and a total of $16.5 million over five years.[228] The highly text-reliant youth population was chosen to illustrate a lower-bound estimate of text-to-988 georouting benefits, which are likely to increase substantially when mortality reductions for other demographic groups who may also text to 988 are considered. Upon review of the record and the full set of available data, we revise our estimated annual benefits from $3.5 million to $4.75 million.[229] This

[223] 47 U.S.C. § 615c(g).

[224] *Text-to-988 Second Report and Order*, 36 FCC Rcd at 16933-34, para. 55.

[225] Accessibility Organizations Comments at 15; *see also* NAMI Comments at 4 ("People with hearing and speech disabilities rely on text as a form of communication, making text messaging an essential part of emergency communication for this community.").

[226] *See supra* paras. 32-33 and 41-43 (addressing technical considerations and technical feasibility).

[227] *See* Accessibility Organizations Comments at 15 (agreeing that the Commission has authority under the CVAA "to adopt rules requiring covered text providers to deliver georouting data with 988 text messages"); CTIA Comments at 5 & n.9 ("The Commission's Title III and CVAA authorities likely provide sufficient authority for the proposed rules."); NAMI Comments at 4 (agreeing that the Commission has authority under "Title III of the Act and the [CVAA], to adopt rules requiring covered text providers to deliver georouting data with covered 988 text messages").

[228] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11871, para. 94.

[229] Because 988 was in effect for the entirety of calendar year 2023, we base our revised mortality-reduction benefits estimate on the full year of available suicide data. We update two assumptions for our benefits estimate. First, we reduce our estimate of the fraction of youth 17-and-under who might text instead of call 988 from 50% to 33%. *See infra* para. 67. Second, we increase the estimate of youth suicide victims to 1,604 based on the 2023 full-year data. CDC WISQARS database query, https://wisqars.cdc.gov/reports/?o=MORT&y1=2023&y2=2023&t=0&i=2&m=20810&g=00&me=0&s=0&r=0&ry

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revision reflects both a downward adjustment based on record evidence indicating a lower likelihood of texts to 988 from youth under 17, and an upward adjustment resulting from the use of a complete year of youth suicide mortality data. Our prior estimate was based on partial 2022 data and therefore underestimated the full-year annual benefits.[230]

66. CPAC offers two comments on the FCC's methodology for estimating the benefits of text-to-988 georouting. First, CPAC raises the possibility of benefits overestimation by cautioning that "SAMHSA reporting reveals that less than 2% of 988 Lifeline contacts require emergency intervention or connection to emergency services. Contrary to the FCC's assumption, [CPAC argues] SAMSHA data indicates that only a very small fraction of calls made to 988 are likely to result in suicide attempts."[231] We disagree with CPAC's characterization of our estimation. Contrary to its assertion, our analysis does not begin with the pool of youths entertaining suicidal thoughts, known as suicidal ideation, then fail to reduce that pool correctly to the 2% needing emergency intervention. Rather, we begin with the substantially smaller set of actual youth suicides—individuals who, by definition, would have required emergency intervention and are therefore properly included in SAMSHA's 2%—to derive our estimated reduction in suicide mortality. Accordingly, we reject CPAC's assertion that our approach overestimates benefits.

67. Second, CPAC correctly states that SMS text messaging accounts for only 17% of all 988 exchanges.[232] However, that fact alone does not preclude youth under 17 from relying heavily on text-to-

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=2&e=0&yp=65&a=custom&g1=0&g2=199&a1=0&a2=17&r1=INTENT&r2=NONE&r3=NONE&r4=NONE (last visited June 30, 2025) (query parameters data year = 2023, injury outcome = fatal, intent = self-harm, mechanism = all causes, geography = United States, sex = all sexes, and age = <1 to 17). Using the 14% misrouting rate, these assumptions imply that a total of 75 (=1,604×0.14×33%) youth suicides among those 17-and-under were vulnerable to misrouting. *See 988 Georouting Third Further Notice*, 39 FCC Rcd at 11870, para. 93 & n.344 (citing Crisis Text Line June 28, 2024 Comments at 2). Approximately 3%, or 2.25 (=.03×1,604×0.14×33%), of the youth who are vulnerable to misrouting could have benefited from a locally tailored intervention, which the comment record indicates are often either only available or more quickly available to those in distress when summoned by a local crisis counselor. *See id.* at 11871, para. 94; LA DMH Comments at 1; NAMI Comments at 1. In short, local interventions amount to time savings. Assuming proper georouting resulted in a 17% reduction in mortality attributable to a one-minute time savings from a faster-arriving, more effective emergency intervention, we estimate that superior local, emergency interventions could have reduced total suicide mortality by 0.38 (=0.17×0.03×1,604×0.14×33%) each year. *911 LBR Report and Order*, 39 FCC Rcd at 578, para. 118 (citing *Location-Based Routing for Wireless 911 Calls*, PS Docket No. 18-64, Notice of Proposed Rulemaking, 37 FCC Rcd 15183, 15206-07, para. 61 & n.161 (2022)); *see also* Elizabeth Ty Wilde, Do Emergency Medical System Response Times Matter for Health Outcomes?, 22(7) Health Econ. 790-806 (2013), http://www.ncbi.nlm.nih.gov/pubmed/22700368 (the study examined 73,706 emergency incidents during 2001 in the Salt Lake City area and study finds that the one-minute increase in response time caused mortality to increase 17% at 90 days past the initial incidence). While we do not attempt to place a value on human life, we note that the amount consumers are willing to pay to reduce mortality risk is approximately $12.5 million, using a methodology developed by the U.S. Department of Transportation (DOT) that we have relied on in past orders. *See, e.g.*, *911 LBR Report and Order*, 39 FCC Rcd at 578, para. 118 (citing the value of $12.5 million in 2022 based on U.S. Department of Transportation, *Departmental Guidance on Valuation of a Statistical Life in Economic Analysis* (Mar. 4, 2022), https://www.transportation.gov/office-policy/transportation-policy/revised-departmental-guidance-on-valuation-of-a-statistical-life-in-economic-analysis (the valuation of a statistical life was updated to $13.7 million for base year 2024) (last updated May 28, 2025)). We estimate the annual mortality risk reduction for which society would be collectively willing to pay is $4.75 million (=0.38×$12.5 million). *See infra* note 235 (discussion of Bayesian estimation).

[230] *Supra* note 229.

[231] CPAC Reply at 5.

[232] *Id.* at 4; *see also* SAMHSA, *988 Lifeline Performance Metrics*, https://www.samhsa.gov/mental-health/988/performance-metrics (last visited June 30, 2025) (noting that the Lifeline routed 2,578,111 text messages and 14,568,848 total contacts since the launch of 988 in July 2022).

988 traffic volume. Indeed, the AFSP-cited 2022 study found that "over [three-quarters] of texts to the Crisis Text Line in one 12-month period were initiated by individuals under the age of 25."[233] Moreover, data from Los Angeles County's local 988 call center show that youth under 25 make up 31% of all 988 contacts and 60% of all 988 text message contacts.[234] Using Bayes' Theorem, we estimate that the probability of a young person contacting the 988 Lifeline through text rather than call is between 33 and 41 percent.[235] Consequently, taking CPAC's argument into consideration, we adjust downward our previous estimate of the likelihood of a person under 17 contacting the 988 Lifeline through text from 50% to 33% so as to be conservative with our estimation of benefits.[236]

68. In another comment regarding our estimation methodology, which partly rests on the Crisis Text Line's claim that 3% of 988 contacts require a local emergency intervention,[237] the Crisis Text Line clarifies that it is not aware "of evidence to support the assumption that georouting for [text-to-988] would result in faster emergency service responses to suicidal contacts, or a decreased number of completed suicides" or "empirical evidence that connecting a texter with a counselor in their local area would be more likely to save their lives (or save more lives) than connecting them with counselors outside their area with access to their local resources and/or national resources."[238] Other commenters, however, proffer evidence as to the mortality-reducing benefits of local interventions. Los Angeles County, the country's most populous county with nearly 10 million people,[239] succinctly captures the life-threatening risks of not accessing local interventions: "[f]irst, residents connected to an out-of-area call center may speak with an agent unfamiliar with local resources, such as Psychiatric [Urgent Care Centers'] clinic appointments. Second, even if the agent is familiar with the County's [specially trained] [Field Intervention Team] program [which could be deployed to the caller's location], the referral and response would be delayed since out-of-area call centers do not have a direct referral process. Third, the potential misrouting of calls can be damaging to our residents' confidence in 988."[240] NAMI polling found that "52% of individuals are more likely to contact 988 in a crisis if they are connected to a crisis counselor in their state/local area."[241] We therefore confirm our previous assessment that local georouting not only enhances public trust in 988, making those in distress more likely to call, but also increases the effectiveness of interventions.

69. Text-to-988 confers other quantifiable benefits for which we previously elected not to estimate a monetary value in the *988 Georouting Third Further Notice*. The largest is the savings in medical, lost-work, and lost-quality-of-life costs of suicide attempts. In 2023, the 82,787

[233] AFSP June 27, 2024 Comments at 3 (citing Anthony R. Pisani et al., *Individuals Who Text Crisis Text Line: Key Characteristics and Opportunities for Suicide Prevention. Suicide and Life-Threatening Behavior*, 52 Suicide Life Threat Behav., 567–582 (2022), https://doi.org/10.1111/sltb.12872).

[234] LA County DMH Comments at 2-3.

[235] P(text|Age<25)=(P(Age<25|text)*P(text))/P(Age<25) = (60%*17%)/31% or (75%*17%)/31% = 33% or 41%, depending on which statistic for P(Age<25|text) is used.

[236] While our 33% estimate is based on available data for youth under 25 rather than youth under 17, we believe this approach is conservative as it is likely that youth under 17 rely even more heavily on text messaging.

[237] Crisis Text Line June 28, 2024 Comments at 2.

[238] Crisis Text Line Nov. 20, 2024 *Ex Parte* at 1-2.

[239] Cathy Le and George M. Hayward, *How Counties That Have Topped One Million Population Have Changed Over Time*, U.S. Census Bureau (Mar. 17, 2025), https://www.census.gov/library/stories/2025/03/million-person-counties.html (noting that Los Angeles County had a population of 9,757,179 in 2024 and was the nation's "most populous million-person county from 1970 to 2024").

[240] LA County DMH Comments at 2.

[241] NAMI Comments at 1.

hospitalizations[242] and 63,604 emergency department visits[243] necessitated by acts of self-harm committed by youth 17-and-under cost society a combined total of $7.95 billion in medical expenses, value of lost work, and diminished quality of life.[244] Although we cannot attribute a precise reduction in suicide attempts to text-to-988 georouting, even a modest one-in-one-thousand reduction in suicide attempts would yield annual, societal cost savings of $7.95 million attributable to text-to-988 georouting, which sums to a net present value of $36.4 million over five years.[245]

70. Finally, no discussion of the benefits of suicide reduction would be complete without mentioning the vast, unquantifiable benefit of sparing victims' families, friends, and communities the emotional devastation of losing their youngest members to suicide. Losing youth deprives communities of the future: In calendar year 2023 alone, the 1,604 suicides among youth 17-and-under resulted in a cumulative loss of 79,884 years of life expectancy prior to the age of 65,[246] typically the most productive years for work, childbearing, and social engagement—years whose absence is profoundly felt by their surviving families, friends, and communities.[247]

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[242] Centers for Disease Control and Prevention Web-based Injury Statistics Query and Reporting System (CDC WISQARS) database query, https://wisqars.cdc.gov/cost/?y=2023&o=HOSP&i=2&m=3000&g=00&s=0&u=TOTAL&u=AVG&t=COMBO&t=MED&t=LIFE&t=WORK&a=custom&g1=0&g2=199&a1=0&a2=17&r1=NONE&r2=NONE&r3=NONE&r4=NONE (last visited June 30, 2025).

[243] CDC WISQARS database query, https://wisqars.cdc.gov/cost/?y=2023&o=TAR&i=2&m=3000&g=00&s=0&u=TOTAL&u=AVG&t=COMBO&t=MED&t=LIFE&t=WORK&a=custom&g1=0&g2=199&a1=0&a2=24&r1=NONE&r2=INTENT&r3=NONE&r4=NONE (last visited June 30, 2025).

[244] $7.95 = $6.4 billion costs of hospitalizations + $1.55 costs of emergency room visits. CDC WISQARS, Cost of Injury, Hospitalizations, https://wisqars.cdc.gov/cost/?y=2023&o=HOSP&i=2&m=3000&g=00&s=0&u=TOTAL&u=AVG&t=COMBO&t=MED&t=LIFE&t=WORK&a=custom&g1=0&g2=199&a1=0&a2=17&r1=NONE&r2=NONE&r3=NONE&r4=NONE&c1=NONE&c2=NONE (last visited June 30, 2025); CDC WISQARS, Cost of Injury, Emergency Department Visits: Treated and Released, https://wisqars.cdc.gov/cost/?y=2023&o=TAR&i=2&m=3000&g=00&s=0&u=TOTAL&u=AVG&t=COMBO&t=MED&t=LIFE&t=WORK&a=custom&g1=0&g2=199&a1=0&a2=17&r1=NONE&r2=INTENT&r3=NONE&r4=NONE&c1=NONE&c2=NONE (last visited June 30, 2025).

[245] $7.95 million=$7,950,000,000/1,000. $7.95 million discounted over 5 years at 3% yields $36.4 million. Using a 3% discount rate that reflects the social rate of time preference. *See* OMB Circular A-4, 2003. https://obamawhitehouse.archives.gov/omb/circulars_a004_a-4.

[246] CDC WISQARS database query, https://wisqars.cdc.gov/reports/?o=MORT&y1=2023&y2=2023&t=0&i=2&m=20810&g=00&me=0&s=0&r=0&ry=2&e=0&yp=65&a=custom&g1=0&g2=199&a1=0&a2=17&r1=INTENT&r2=NONE&r3=NONE&r4=NONE (last visited June 30, 2025).

[247] Studies and data suggest that the years prior to age 45 are the most fruitful in many ways. Between 2021 and 2023, peak average fertility for American women occurred between the ages of 20 and 39. *See* March of Dimes, PeriStats Births, https://www.marchofdimes.org/peristats/data?reg=99&top=2&stop=2&lev=1&slev=1&obj=1 (last visited June 30, 2025). For men, mean paternal age is 30.9 years. *See* Yash S. Khandwala et al., The Age of Fathers in the USA Is Rising: An Analysis of 168,867,480 Births from 1972 to 2015, 32(10) Hum. Reprod. 2110-2116 (2017), https://academic.oup.com/humrep/article/32/10/2110/4096427?login=false. The literature on productivity suggests that work productivity peaks between ages 35 and 44. *See* Vegard Skirbekk, Age and Productivity Potential: A New Approach Based on Ability Levels and Industry-Wide Task Demand, in *Population, Aging, Human Capital Accumulation, and Productivity Growth* 191-207, 34 Population & Dev. Rev. (2008), JSTOR, https://www.jstor.org/stable/25434764?read-now=1&seq=1#page_scan_tab_contents. Psychologists tell us that social networks, one barometer of social engagement, plateau between the mid-20s and early 30s and continually decrease throughout adulthood and old age. *See* Cornelius Wrzus et al., Social Network Changes and Life Events

(continued….)

71. *Costs.* In the absence of conclusive cost data, the *988 Georouting Third Further Notice* sought to resolve competing claims about the cost and difficulty of implementing georouting solutions for text-to-988.[248] RWA responded that 988 georouting solutions, including calls and texts, could cost RWA member carriers $4-$5 per subscriber per month.[249] The support for that cost estimate is one RWA member, which reports receiving an estimate of $2,000-$2,500 per month to implement 988 georouting.[250] RWA's cost anecdote raises several issues. First, RWA commingles both voice-to-988 and text-to-988 georouting, obscuring the individual cost of each georouting capability. Accurately assessing the costs of each routing capability would require a disentangling of costs. Second, RWA's cost estimate may not represent RWA's typical member. The RWA member in question would have had only 500 subscribers for the 988 georouting solution to average $4-$5 per subscriber per month, placing this RWA member in RWA's smallest membership-size tier.[251] Larger carriers would enjoy the average-cost-reducing benefits of scale. Finally, RWA's cost estimate fails to demonstrate a prohibitive cost burden for wireless carriers overall, as certain vendors have indicated that a large share of the costs would be fixed implementation costs for facilities-based CMRS providers with a low marginal cost of georouting an individual text.[252] Number Resource Utilization/Forecast data indicate that there are 57 facilities-based wireless carriers in the United States.[253] Focusing on facilities-based wireless carriers that would incur the costs of any network upgrades provides a reasonable annual implementation cost estimate of one available solution for the entire wireless industry of $1.71 million (=$2,500×57×12). Even doubling this industry-wide estimate for a single solution would still result in implementation costs well below the expected benefits of our rules. In addition, the compliance deadlines of 18 months for nationwide providers and 36 months for non-nationwide providers following the effective date of this *Fourth Report and Order* will allow providers to manage implementation costs.

72. Providers are currently developing viable text-to-988 georouting solutions. For example, CX360 states that it "is already collaborating with the Lifeline Administrator, wireless carriers and other 988 stakeholders to develop and identify an appropriate text-to-988 georouting solution."[254] Many of these collaborations are voluntary.[255] Several commenters urge the Commission to refrain from prescribing the specific text-to-988 georouting solution or the timing of its adoption.[256] Permitting flexibility makes the adoption of cost-effective text-to-988 solutions more likely. Without prescribing any single text-to-988 georouting solution, we find no evidence in the record to suggest that the costs associated with implementing text-to-988 georouting solutions are likely to be prohibitive. Indeed, the industry-wide text-to-988 implementation costs of one solution identified in the record are far below the estimated benefits.

(Continued from previous page)
Across the Lifespan: A Meta-Analysis, 139(1) Psychol. Bull. 532-80 (2013), https://psycnet.apa.org/fulltext/2012-13785-001.html.

[248] *988 Georouting Third Further Notice*, 39 FCC Rcd at 11872-73, para. 97.

[249] RWA Comments at 3.

[250] *Id.* at 3 & n.14.

[251] RWA, *Why Join RWA?*, https://ruralwireless.org/membership/ (last visited June 30, 2025).

[252] *See* CX360 Comments at 6; AT&T Reply at 8-9 (supporting continued reliance on the Lifeline's centralized routing structure such that any text-to-988 solution utilizes the existing infrastructure to the greatest extent possible); *see also* CTIA Comments at 2 (arguing that "technology-neutral and flexible regulations . . . enable providers and the Lifeline to maximize current technology and network configurations").

[253] Staff analysis of Numbering Resource Utilization and Forecast (NRUF) data. *See* 47 CFR § 52.15.

[254] CX360 Comments at 2-3; CX360 Reply at 9-10.

[255] CTIA Comments at 2; CTIA Reply at 9.

[256] AT&T Reply at 5-6; CTIA Reply at 5, 9; CX360 Reply at 3-4.

IV. PROCEDURAL MATTERS

73. *Regulatory Flexibility Act.* The Regulatory Flexibility Act of 1980, as amended (RFA),[257] requires that an agency prepare a regulatory flexibility analysis for notice and comment rulemakings, unless the agency certifies that "the rule will not, if promulgated, have a significant economic impact on a substantial number of small entities."[258] Accordingly, the Commission has prepared a Final Regulatory Flexibility Analysis (FRFA) concerning the possible impact of the rule and policy changes contained in this *Fourth Report and Order* on small entities. The FRFA is set forth in Appendix B.

74. *Paperwork Reduction Act.* This document does not contain new or substantively modified information collections subject to the Paperwork Reduction Act of 1995 (PRA), 44 U.S.C. §§ 3501-3521. In addition, therefore, it does not contain any new or modified information collection burden for small business concerns with fewer than 25 employees, pursuant to the Small Business Paperwork Relief Act of 2002, 44 U.S.C. § 3506(c)(4).

75. *Congressional Review Act.* The Commission will submit this draft *Fourth Report and Order* to the Administrator of the Office of Information and Regulatory Affairs, Office of Management and Budget, for concurrence as to whether this rule is "major" or "non-major" under the Congressional Review Act, 5 U.S.C. § 804(2). The Commission will send a copy of this *Fourth Report and Order* to Congress and the Government Accountability Office pursuant to 5 U.S.C. § 801(a)(1)(A).

76. *Accessible formats*. To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice).

77. *Additional Information*. For additional information on this proceeding, contact Merry Wulff, Wireline Competition Bureau, Competition Policy Division, at Merry.Wulff@fcc.gov or (202) 418-1084.

V. ORDERING CLAUSES

78. Accordingly, IT IS ORDERED that, pursuant to sections 1, 2, 4, 301, 303, 307, 309(a), 316, 332 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154, 301, 303, 307, 309(a), 316, 332, and section 106 of the Twenty-First Century Communications and Video Accessibility Act of 2010, Pub. L. No. 111-260, 47 U.S.C. § 615c, this *Fourth Report and Order* IS ADOPTED.

79. IT IS FURTHER ORDERED that Part 52 of the Commission's rules IS AMENDED as set forth in Appendix A, and such rule amendment will become effective 30 days after publication in the Federal Register.

80. IT IS FURTHER ORDERED that the Commission's Office of the Secretary SHALL SEND a copy of this *Fourth Report and Order*, including the Final Regulatory Flexibility Analysis, to the Chief Counsel for Advocacy of the Small Business Administration.

[257] 5 U.S.C. §§ 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[258] *Id.* § 605(b).

81. IT IS FURTHER ORDERED that the Office of the Managing Director, Performance and Program Management, SHALL SEND a copy of this *Fourth Report and Order* in a report to be sent to Congress and the Government Accountability Office pursuant to the Congressional Review Act, see 5 U.S.C. § 801(a)(1)(A).

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

APPENDIX A

Final Rules

The Federal Communications Commission amends part 52 of Title 47 of the Code of Federal Regulations as follows:

PART 52 − NUMBERING

1. The authority citation for part 52 continues to read as follows:

Authority: 47 U.S.C. 151, 152, 153, 154, 155, 201-205, 207-209, 218, 225-227, 251-252, 271, 303, 332, unless otherwise noted.

2. Amend § 52.201 by revising paragraph (b) to read as follows:

§ 52.201 [Amended]

* * * * *

(b) *Access to SMS networks for 988 text messages*. To the extent that Commercial Mobile Radio Service (CMRS) providers offer Short Message Service (SMS), they shall 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.

* * * * *

3. Add new § 52.203 to read as follows:

§ 52.203 Georouting of text messages to the National Suicide Prevention and Mental Health Crisis Hotline.

(a) *Georouting*. All covered text providers must:

(1) Have the capability to provide georouting data for covered 988 text messages to the Lifeline Administrator in a format that is compatible with the Lifeline's routing platform, to allow routing of the 988 text message by the Lifeline Administrator to the appropriate crisis center based on the geographic area where the handset is located at the time the 988 text is initiated.

(2) Provide georouting data, when available, for covered 988 text messages to the Lifeline Administrator sufficient to allow routing of the 988 text message by the Lifeline Administrator to the appropriate crisis center based on the geographic area where the handset is located at the time the 988 text message is initiated.

(b) *Definitions*. For the purposes of this section:

(1) *Covered 988 text message* has the same definition as found in § 52.201;

(2) *Covered text provider* has the same definition as found in § 52.201;

(3) *Georouting data* means 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.

(4*) Lifeline Administrator* has the same definition as found in § 52.202;

(5) *Nationwide CMRS provider* has the same definition as found in § 52.202; and

(6) *Non-nationwide CMRS provider* has the same definition as found in § 52.202.

(c) *Compliance*.

(1) Covered 988 text providers that are nationwide CMRS providers shall provide georouting data for 988 texts in accordance with paragraph (a) of this section by [INSERT DATE 19 MONTHS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER].

(2) Covered 988 text providers that are non-nationwide CMRS providers shall provide georouting data for 988 texts in accordance with paragraph (a) of this section by [INSERT DATE 37 MONTHS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER].

APPENDIX B

Final Regulatory Flexibility Analysis

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),[1] the Federal Communications Commission (Commission) incorporated an Initial Regulatory Flexibility Analysis (IRFA) in the *Implementation of the National Suicide Hotline Improvement Act of 2018 Third Further Notice of Proposed Rulemaking* (*988 Georouting Third Further Notice*), released in October 2024.[2] The Commission sought written public comment on the proposals in the *988 Georouting Third Further Notice*, including comment on the IFRA. The comments received are addressed below. This Final Regulatory Flexibility Analysis (FRFA) conforms to the RFA and it (or summaries thereof) will be published in the Federal Register.[3]

A. Need for, and Objectives of, the Rules

2. In the *Fourth Report and Order*, we require covered text providers to develop and implement georouting solutions for 988 text messages. Based on our review of the record, we find that requiring providers to implement a georouting solution for 988 text messages is essential to improving access to the Lifeline's critical mental health crisis and suicide prevention services. The record overwhelming supports the conclusion that georouting for 988 text messages will help connect individuals with more geographically appropriate crisis centers that may have a better understanding of available local resources and unique community stressors.[4] Additionally, as several commenters emphasize, achieving routing parity with voice calls will help to minimize inconsistencies in service quality that may discourage individuals from seeking help, further increasing trust in the 988 Lifeline.[5]

3. In the *Fourth Report and Order*, we adopt a two-part requirement designed to enhance the Lifeline's ability to connect text users to geographically appropriate crisis centers, while safeguarding the critical privacy interests of individuals seeking life-saving assistance. To enable 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, we require small and other covered text providers to: (1) develop the capability to transmit georouting data in a format that is

[1] 5 U.S.C. §§ 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[2] *Implementation of the National Suicide Hotline Act of 2018*, WC Docket 18-336, Third Report and Order and Third Further Notice of Proposed Rulemaking, 39 FCC Rcd 11823, Appx. C (2024).

[3] 5 U.S.C. § 604.

[4] *See, e.g.*, Association for Behavioral Health and Wellness (ABHW) Comments at 1; CTIA Comments at 7; Steve Alanzo Comments at 1 (filed on behalf of the International Association of Fire Chiefs) (IAFC Comments); *see also, e.g.*, Accessibility Organizations Comments at 2-3; American Foundation for Suicide Prevention Comments at 1 (AFSP Comments); Boulder Emergency Telephone Service Authority (BRETSA) PN Comments at 2-3; CX 360 Comments at 4; Intrado Comments at 1; County of Los Angeles Department of Mental Health Comments (LA County DMH Comments) at 1; National Alliance on Mental Illness (NAMI) Comments at 1-2; Reimagine Crisis Comments at 1-2; Trevor Project Comments at 2; Vibrant Comments at 5-6; AT&T Reply at 1; Comtech Reply at 2; Crisis Text Line Nov. 20, 2020 *Ex Parte* at 1-2.

[5] *See, e.g.*, Letter from Michael McMenamin, Counsel, Winning Strategies Washington, to Marelene H. Dortch, Secretary, FCC, WC Docket No. 18-336, at 1 (filed May 5, 2025) (NAMI May 5, 2025 *Ex Parte*); Electronic Privacy Information Center and Wildflower Alliance Reply, WC Docket No. 18-336, at 3-4 (filed Apr. 18, 2025); Accessibility Organizations Comments at 3; *see also* AFSP Comments at 2; CX360 Comments at 4; LA County DMH at 3; NAMI Comments at 1-2; Reimagine Crisis Comments at 1-2; Vibrant Comments at 5-6; AT&T Reply at 6.

compatible with the Lifeline's system; and (2) provide such georouting data for 988 text messages, when available, to the Lifeline Administrator. In adopting these rules, we support voluntary efforts to identify and develop industry-based georouting solutions for 988 text messages by providing a flexible, technology-neutral framework for our requirements. In order to facilitate ongoing efforts to develop 988 text georouting capabilities, while providing flexibility for smaller providers, we adopt an implementation timeframe of 18 months for nationwide providers, and 36 months for non-nationwide providers.

B. Summary of Significant Issues Raised by Public Comments in Response to the IRFA

4. Comments regarding the impact of the rules on small entities were filed by the Rural Wireless Association (RWA).[6] RWA expressed concerns that the Commission's proposed mandate to georoute 988 text messages would disproportionately increase costs for small rural non-nationwide Commercial Mobile Radio Service (CMRS) providers and advocated for the Commission to allow non-nationwide providers to implement georouting voluntarily.[7] RWA further suggested that, should the Commission decide to require providers to implement georouting for 988 text messages, the Commission should: "(1) provide small rural non-nationwide CMRS providers at least 36 months to comply with such mandate; and (2) allocate funds to subsidize small rural non-nationwide CMRS providers' efforts to comply with the mandate."[8] The *Fourth Report and Order* addresses RWA's comments by adopting a technology-neutral framework and providing non-nationwide providers with 36 months to comply with the georouting requirements, as specifically requested by RWA. As discussed in section F below, the Commission declines to adopt RWA's proposals to allow non-nationwide carriers to implement georouting on a voluntary basis or to subsidize efforts for small covered text providers to comply.

C. Response to Comments by the Chief Counsel for Advocacy of the Small Business Administration

5. Pursuant to the Small Business Jobs Act of 2010, which amended the RFA,[9] the Commission is required to respond to any comments filed by the Chief Counsel for Advocacy of the Small Business Administration (SBA), and provide a detailed statement of any change made to the proposed rules as a result of those comments.[10] The Chief Counsel did not file any comments in response to the proposed rules in this proceeding.

D. Description and Estimate of the Number of Small Entities to Which the Rules Will Apply

6. The RFA directs agencies to provide a description of, and where feasible, an estimate of the number of small entities that may be affected by the rules adopted herein.[11] The RFA generally defines the term "small entity" as having the same meaning as under the Small Business Act.[12] In addition, the term "small business" has the same meaning as the term "small business concern" under the Small Business Act."[13] A "small business concern" is one which: (1) is independently owned and

[6] RWA Comments at 1-4.

[7] *Id.* at 2-4.

[8] *Id.* at 2.

[9] Small Business Jobs Act of 2010, Pub. L. No. 111-240, 124 Stat. 2504 (2010).

[10] 5 U.S.C. § 604 (a)(3).

[11] *Id.* § 604 (a)(4).

[12] *Id.* § 601(6).

[13] *Id*. § 601(3) (incorporating by reference the definition of "small-business concern" in the Small Business Act, 15 U.S.C. § 632). Pursuant to 5 U.S.C. § 601(3), the statutory definition of a small business applies "unless an agency, after consultation with the Office of Advocacy of the Small Business Administration and after opportunity for public

(continued….)

operated; (2) is not dominant in its field of operation; and (3) satisfies any additional criteria established by the SBA.[14]

7. *Small Businesses, Small Organizations, Small Governmental Jurisdictions.* Our actions, over time, may affect small entities that are not easily categorized at present. We therefore describe three broad groups of small entities that could be directly affected by our actions.[15] First, while there are industry specific size standards for small businesses that are used in the regulatory flexibility analysis, in general, a small business is an independent business having fewer than 500 employees.[16] These types of small businesses represent 99.9% of all businesses in the United States, which translates to 34.75 million businesses.[17] Next, "small organizations" are not-for-profit enterprises that are independently owned and operated and not dominant their field.[18] While we do not have data regarding the number of non-profits that meet that criteria, over 99 percent of nonprofits have fewer than 500 employees.[19] Finally, "small governmental jurisdictions" are defined as cities, counties, towns, townships, villages, school districts, or special districts with populations of less than fifty thousand.[20] Based on the 2022 U.S. Census of Governments data, we estimate that at least 48,724 out of 90,835 local government jurisdictions have a population of less than 50,000.[21]

8. *Wired Telecommunications Carriers.* The U.S. Census Bureau defines this industry as establishments primarily engaged in operating and/or providing access to transmission facilities and infrastructure that they own and/or lease for the transmission of voice, data, text, sound, and video using wired communications networks.[22] Transmission facilities may be based on a single technology or a combination of technologies. Establishments in this industry use the wired telecommunications network facilities that they operate to provide a variety of services, such as wired telephony services, including VoIP services, wired (cable) audio and video programming distribution, and wired broadband Internet services.[23] By exception, establishments providing satellite television distribution services using facilities and infrastructure that they operate are included in this industry.[24] Wired Telecommunications Carriers

(Continued from previous page)
comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register."

[14] 15 U.S.C. § 632.

[15] 5 U.S.C. § 601(3)-(6).

[16] *See* SBA, Office of Advocacy, *Frequently Asked Questions About Small Business* (July 23, 2024), https://advocacy.sba.gov/wp-content/uploads/2024/12/Frequently-Asked-Questions-About-Small-Business_2024-508.pdf.

[17] *Id*.

[18] 5 U.S.C. § 601(4).

[19] *See* SBA, Office of Advocacy, *Small Business Facts, Spotlight on Nonprofits* (July 2019), https://advocacy.sba.gov/2019/07/25/small-business-facts-spotlight-on-nonprofits/.

[20] 5 U.S.C. § 601(5).

[21] *See* U.S. Census Bureau, 2022 Census of Governments –Organization, https://www.census.gov/data/tables/2022/econ/gus/2022-governments.html, tables 1-11.

[22] *See* U.S. Census Bureau, *2017 NAICS Definition, "517311 Wired Telecommunications Carriers,"* https://www.census.gov/naics/?input=517311&year=2017&details=517311.

[23] *Id.*

[24] *Id.*

are also referred to as wireline carriers or fixed local service providers.[25]

9. The SBA small business size standard for Wired Telecommunications Carriers classifies firms having 1,500 or fewer employees as small.[26] U.S. Census Bureau data for 2017 show that there were 3,054 firms that operated in this industry for the entire year.[27] Of this number, 2,964 firms operated with fewer than 250 employees.[28] Additionally, based on Commission data in the 2024 Universal Service Monitoring Report, in 2023 there were 4,682 providers that reported they were engaged in the provision of fixed local services.[29] Of these providers, the Commission estimates that 4,276 providers have 1,500 or fewer employees.[30] Consequently, using the SBA's small business size standard, most of these providers can be considered small entities.

10. *Local Exchange Carriers (LECs).* Neither the Commission nor the SBA has developed a size standard for small businesses specifically applicable to local exchange services. Providers of these services include both incumbent and competitive local exchange service providers. Wired Telecommunications Carriers[31] is the closest industry with an SBA small business size standard.[32] Wired Telecommunications Carriers are also referred to as wireline carriers or fixed local service providers.[33] The SBA small business size standard for Wired Telecommunications Carriers classifies firms having 1,500 or fewer employees as small.[34] U.S. Census Bureau data for 2017 show that there were 3,054 firms that operated in this industry for the entire year.[35] Of this number, 2,964 firms operated with fewer than

[25] Fixed Local Service Providers include the following types of providers: Incumbent Local Exchange Carriers (ILECs), Competitive Access Providers (CAPs) and Competitive Local Exchange Carriers (CLECs), Cable/Coax CLECs, Interconnected VOIP Providers, Non-Interconnected VOIP Providers, Shared-Tenant Service Providers, Audio Bridge Service Providers, and Other Local Service Providers. Local Resellers fall into another U.S. Census Bureau industry group and therefore data for these providers is not included in this industry.

[26] *See* 13 CFR § 121.201, NAICS Code 517311 (as of 10/1/22, NAICS Code 517111).

[27] *See* U.S. Census Bureau, *2017 Economic Census of the United States, Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517311, https://data.census.gov/cedsci/table?y=2017&n=517311&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[28] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[29] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf.

[30] *Id.*

[31] *See* U.S. Census Bureau, *2017 NAICS Definition, "517311 Wired Telecommunications Carriers,"* https://www.census.gov/naics/?input=517311&year=2017&details=517311.

[32] *See* 13 CFR § 121.201, NAICS Code 517311 (as of 10/1/22, NAICS Code 517111).

[33] Fixed Local Exchange Service Providers include the following types of providers: Incumbent Local Exchange Carriers (ILECs), Competitive Access Providers (CAPs) and Competitive Local Exchange Carriers (CLECs), Cable/Coax CLECs, Interconnected VOIP Providers, Non-Interconnected VOIP Providers, Shared-Tenant Service Providers, Audio Bridge Service Providers, Local Resellers, and Other Local Service Providers.

[34] *Id.*

[35] *See* U.S. Census Bureau, *2017 Economic Census of the United States, Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517311, https://data.census.gov/cedsci/table?y=2017&n=517311&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

250 employees.[36] Additionally, based on Commission data in the 2022 Universal Service Monitoring Report, in 2023 there were 4,904 providers that reported they were fixed local exchange service providers.[37] Of these providers, the Commission estimates that 4,493 providers have 1,500 or fewer employees.[38] Consequently, using the SBA's small business size standard, most of these providers can be considered small entities.

11. *Incumbent Local Exchange Carriers (Incumbent LECs).* Neither the Commission nor the SBA have developed a small business size standard specifically for incumbent local exchange carriers. Wired Telecommunications Carriers[39] is the closest industry with an SBA small business size standard.[40] The SBA small business size standard for Wired Telecommunications Carriers classifies firms having 1,500 or fewer employees as small.[41] U.S. Census Bureau data for 2017 show that there were 3,054 firms in this industry that operated for the entire year.[42] Of this number, 2,964 firms operated with fewer than 250 employees.[43] Additionally, based on Commission data in the 2024 Universal Service Monitoring Report, in 2023 there were 1,175 providers that reported they were incumbent local exchange service providers.[44] Of these providers, the Commission estimates that 917 providers have 1,500 or fewer employees.[45] Consequently, using the SBA's small business size standard, the Commission estimates that the majority of incumbent local exchange carriers can be considered small entities.

12. *Competitive Local Exchange Carriers (CLECs).* Neither the Commission nor the SBA has developed a size standard for small businesses specifically applicable to local exchange services. Providers of these services include several types of competitive local exchange service providers.[46] Wired Telecommunications Carriers[47] is the closest industry with a SBA small business size standard. The SBA small business size standard for Wired Telecommunications Carriers classifies firms having

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[36] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[37] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf.

[38] *Id.*

[39] *See* U.S. Census Bureau, *2017 NAICS Definition, "517311 Wired Telecommunications Carriers,"* https://www.census.gov/naics/?input=517311&year=2017&details=517311.

[40] *See* 13 CFR § 121.201, NAICS Code 517311 (as of 10/1/22, NAICS Code 517111).

[41] *Id.*

[42] *See* U.S. Census Bureau, *2017 Economic Census of the United States, Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517311, https://data.census.gov/cedsci/table?y=2017&n=517311&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[43] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[44] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf.

[45] *Id.*

[46] Competitive Local Exchange Service Providers include the following types of providers: Competitive Access Providers (CAPs) and Competitive Local Exchange Carriers (CLECs), Cable/Coax CLECs, Interconnected VOIP Providers, Non-Interconnected VOIP Providers, Shared-Tenant Service Providers, Audio Bridge Service Providers, Local Resellers, and Other Local Service Providers.

[47] *See* U.S. Census Bureau, *2017 NAICS Definition, "517311 Wired Telecommunications Carriers,"* https://www.census.gov/naics/?input=517311&year=2017&details=517311.

1,500 or fewer employees as small.[48] U.S. Census Bureau data for 2017 show that there were 3,054 firms that operated in this industry for the entire year.[49] Of this number, 2,964 firms operated with fewer than 250 employees.[50] Additionally, based on Commission data in the 2024 Universal Service Monitoring Report, in 2023 there were 3,729 providers that reported they were competitive local service providers.[51] Of these providers, the Commission estimates that 3,576 providers have 1,500 or fewer employees .[52] Consequently, using the SBA's small business size standard, most of these providers can be considered small entities.

13. *Interexchange Carriers (IXCs).* Neither the Commission nor the SBA have developed a small business size standard specifically for Interexchange Carriers. Wired Telecommunications Carriers[53] is the closest industry with a SBA small business size standard.[54] The SBA small business size standard for Wired Telecommunications Carriers classifies firms having 1,500 or fewer employees as small.[55] U.S. Census Bureau data for 2017 show that there were 3,054 firms that operated in this industry for the entire year.[56] Of this number, 2,964 firms operated with fewer than 250 employees.[57] Additionally, based on Commission data in the 2022 Universal Service Monitoring Report, as of December 31, 2021, there were 127 providers that reported they were engaged in the provision of interexchange services. Of these providers, the Commission estimates that 109 providers have 1,500 or fewer employees.[58] Consequently, using the SBA's small business size standard, the Commission estimates that the majority of providers in this industry can be considered small entities.

14. *Local Resellers*. Neither the Commission nor the SBA have developed a small business size standard specifically for Local Resellers. Telecommunications Resellers is the closest industry with a SBA small business size standard.[59] The Telecommunications Resellers industry comprises

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[48] *See* 13 CFR § 121.201, NAICS Code 517311 (as of 10/1/22, NAICS Code 517111).

[49] *See* U.S. Census Bureau, *2017 Economic Census of the United States, Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517311, https://data.census.gov/cedsci/table?y=2017&n=517311&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[50] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[51] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf.

[52] *Id.*

[53] *See* U.S. Census Bureau, *2017 NAICS Definition, "517311 Wired Telecommunications Carriers,"* https://www.census.gov/naics/?input=517311&year=2017&details=517311.

[54] *See* 13 CFR § 121.201, NAICS Code 517311 (as of 10/1/22, NAICS Code 517111).

[55] *Id.*

[56] *See* U.S. Census Bureau, *2017 Economic Census of the United States, Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517311, https://data.census.gov/cedsci/table?y=2017&n=517311&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[57] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[58] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2022), https://docs.fcc.gov/public/attachments/DOC-391070A1.pdf.

[59] *See* U.S. Census Bureau, *2017 NAICS Definition*, "*517911 Telecommunications Resellers,*" https://www.census.gov/naics/?input=517911&year=2017&details=517911.

establishments engaged in purchasing access and network capacity from owners and operators of telecommunications networks and reselling wired and wireless telecommunications services (except satellite) to businesses and households.[60] Establishments in this industry resell telecommunications; they do not operate transmission facilities and infrastructure.[61] Mobile virtual network operators (MVNOs) are included in this industry.[62] The SBA small business size standard for Telecommunications Resellers classifies a business as small if it has 1,500 or fewer employees.[63] U.S. Census Bureau data for 2017 show that 1,386 firms in this industry provided resale services for the entire year.[64] Of that number, 1,375 firms operated with fewer than 250 employees.[65] Additionally, based on Commission data in the 2024 Universal Service Monitoring Report, in 2023 there were 222 providers that reported they were engaged in the provision of local resale services.[66] Of these providers, the Commission estimates that 217providers have 1,500 or fewer employees.[67] Consequently, using the SBA's small business size standard, most of these providers can be considered small entities.

15. *Toll Resellers*. Neither the Commission nor the SBA have developed a small business size standard specifically for Toll Resellers. Telecommunications Resellers[68] is the closest industry with a SBA small business size standard. The Telecommunications Resellers industry comprises establishments engaged in purchasing access and network capacity from owners and operators of telecommunications networks and reselling wired and wireless telecommunications services (except satellite) to businesses and households. Establishments in this industry resell telecommunications; they do not operate transmission facilities and infrastructure.[69] Mobile virtual network operators (MVNOs) are included in this industry.[70] The SBA small business size standard for Telecommunications Resellers classifies a business as small if it has 1,500 or fewer employees.[71] U.S. Census Bureau data for 2017 show that 1,386 firms in this industry provided resale services for the entire year.[72] Of that number, 1,375

[60] *Id.*

[61] *Id*.

[62] *Id*.

[63] *See* 13 CFR § 121.201, NAICS Code 517911 (as of 10/1/22, NAICS Code 517121).

[64] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517911, https://data.census.gov/cedsci/table?y=2017&n=517911&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[65] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[66] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf.

[67] *Id.*

[68] *See* U.S. Census Bureau, *2017 NAICS Definition*, "*517911 Telecommunications Resellers,*" https://www.census.gov/naics/?input=517911&year=2017&details=517911.

[69] *Id.*

[70] *Id*.

[71] *See* 13 CFR § 121.201, NAICS Code 517911 (as of 10/1/22, NAICS Code 517121).

[72] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517911, https://data.census.gov/cedsci/table?y=2017&n=517911&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

firms operated with fewer than 250 employees.[73] Additionally, based on Commission data in the 2024 Universal Service Monitoring Report, in 2023 there were 411 providers that reported they were engaged in the provision of toll services.[74] Of these providers, the Commission estimates that 398 providers have 1,500 or fewer employees.[75] Consequently, using the SBA's small business size standard, most of these providers can be considered small entities.

16. *Other Toll Carriers*. Neither the Commission nor the SBA has developed a definition for small businesses specifically applicable to Other Toll Carriers. This category includes toll carriers that do not fall within the categories of interexchange carriers, operator service providers, prepaid calling card providers, satellite service carriers, or toll resellers. Wired Telecommunications Carriers[76] is the closest industry with a SBA small business size standard.[77] The SBA small business size standard for Wired Telecommunications Carriers classifies firms having 1,500 or fewer employees as small.[78] U.S. Census Bureau data for 2017 show that there were 3,054 firms in this industry that operated for the entire year.[79] Of this number, 2,964 firms operated with fewer than 250 employees.[80] Additionally, based on Commission data in the 2024 Universal Service Monitoring Report, in 2023 there were 74 providers that reported they were engaged in the provision of other toll services.[81] Of these providers, the Commission estimates that 71 providers have 1,500 or fewer employees.[82] Consequently, using the SBA's small business size standard, most of these providers can be considered small entities.

17. *Prepaid Calling Card Providers.* Neither the Commission nor the SBA has developed a small business size standard specifically for prepaid calling card providers. Telecommunications Resellers[83] is the closest industry with a SBA small business size standard. The Telecommunications Resellers industry comprises establishments engaged in purchasing access and network capacity from owners and operators of telecommunications networks and reselling wired and wireless telecommunications services (except satellite) to businesses and households. Establishments in this industry resell telecommunications; they do not operate transmission facilities and infrastructure.[84]

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[73] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[74] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf.

[75] *Id.*

[76] *See* U.S. Census Bureau, *2017 NAICS Definition, "517311 Wired Telecommunications Carriers,"* https://www.census.gov/naics/?input=517311&year=2017&details=517311.

[77] *See* 13 CFR § 121.201, NAICS Code 517311 (as of 10/1/22, NAICS Code 517111).

[78] *Id.*

[79] *See* U.S. Census Bureau, *2017 Economic Census of the United States, Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517311, https://data.census.gov/cedsci/table?y=2017&n=517311&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[80] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[81] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf.

[82] *Id.*

[83] *See* U.S. Census Bureau, *2017 NAICS Definition*, "*517911 Telecommunications Resellers,*" https://www.census.gov/naics/?input=517911&year=2017&details=517911.

[84] *Id.*

Mobile virtual network operators (MVNOs) are included in this industry.[85] The SBA small business size standard for Telecommunications Resellers classifies a business as small if it has 1,500 or fewer employees.[86] U.S. Census Bureau data for 2017 show that 1,386 firms in this industry provided resale services for the entire year.[87] Of that number, 1,375 firms operated with fewer than 250 employees.[88] Additionally, based on Commission data in the 2024 Universal Service Monitoring Report, in 2023 there were 47 providers that reported they were engaged in the provision of prepaid card services.[89] Of these providers, the Commission estimates that 47 providers have 1,500 or fewer employees.[90] Consequently, using the SBA's small business size standard, most of these providers can be considered small entities.

18. *Wireless Telecommunications Carriers (except Satellite).* This industry comprises establishments engaged in operating and maintaining switching and transmission facilities to provide communications via the airwaves.[91] Establishments in this industry have spectrum licenses and provide services using that spectrum, such as cellular services, paging services, wireless Internet access, and wireless video services.[92] The SBA size standard for this industry classifies a business as small if it has 1,500 or fewer employees.[93] U.S. Census Bureau data for 2017 show that there were 2,893 firms in this industry that operated for the entire year.[94] Of that number, 2,837 firms employed fewer than 250 employees.[95] Additionally, based on Commission data in the 2024 Universal Service Monitoring Report, in 2023 there were 585 providers that reported they were engaged in the provision of wireless services.[96] Of these providers, the Commission estimates that 498 providers have 1,500 or fewer employees.[97] Consequently, using the SBA's small business size standard, most of these providers can be considered small entities.

19. *Cable and Other Subscription Programming.* The U.S. Census Bureau defines this

[85] *Id*.

[86] *See* 13 CFR § 121.201, NAICS Code 517911 (as of 10/1/22, NAICS Code 517121).

[87] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517911, https://data.census.gov/cedsci/table?y=2017&n=517911&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[88] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[89] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2022), https://docs.fcc.gov/public/attachments/DOC-391070A1.pdf.

[90] *Id.*

[91] *See* U.S. Census Bureau, *2017 NAICS Definition, "517312 Wireless Telecommunications Carriers (except Satellite),"* https://www.census.gov/naics/?input=517312&year=2017&details=517312.

[92] *Id.*

[93] *See* 13 CFR § 121.201, NAICS Code 517312 (as of 10/1/22, NAICS Code 517112).

[94] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517312, https://data.census.gov/cedsci/table?y=2017&n=517312&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[95] *Id*. The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[96] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf.

[97] *Id.*

industry as establishments primarily engaged in operating studios and facilities for the broadcasting of programs on a subscription or fee basis.[98] The broadcast programming is typically narrowcast in nature (e.g., limited format, such as news, sports, education, or youth-oriented). These establishments produce programming in their own facilities or acquire programming from external sources.[99] The programming material is usually delivered to a third party, such as cable systems or direct-to-home satellite systems, for transmission to viewers.[100] The SBA small business size standard for this industry classifies firms with annual receipts less than $47 million as small.[101] Based on U.S. Census Bureau data for 2017, 378 firms operated in this industry during that year.[102] Of that number, 149 firms operated with revenue of less than $25 million a year and 44 firms operated with revenue of $25 million or more.[103] Based on this data, the Commission estimates that a majority of firms in this industry are small.

20. *Cable Companies and Systems (Rate Regulation).* The Commission has developed its own small business size standard for the purpose of cable rate regulation. Under the Commission's rules, a "small cable company" is one serving 400,000 or fewer subscribers nationwide.[104] Based on industry data, there are about 420 cable companies in the U.S.[105] Of these, only seven have more than 400,000 subscribers.[106] In addition, under the Commission's rules, a "small system" is a cable system serving 15,000 or fewer subscribers.[107] Based on industry data, there are about 4,139 cable systems (headends) in the U.S.[108] Of these, about 639 have more than 15,000 subscribers.[109] Accordingly, the Commission estimates that the majority of cable companies and cable systems are small.

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[98] *See* U.S. Census Bureau, *2017 NAICS Definition, "515210 Cable and Other Subscription Programming,"* https://www.census.gov/naics/?input=515210&year=2017&details=515210.

[99] *Id.*

[100] *Id.*

[101] *See* 13 CFR § 121.201, NAICS Code 515210 (as of 10/1/22, NAICS Code 516210).

[102] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEREVFIRM, NAICS Code 515210, https://data.census.gov/cedsci/table?y=2017&n=515210&tid=ECNSIZE2017.EC1700SIZEREVFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available. The US Census Bureau withheld publication of the number of firms that operated for the entire year to avoid disclosing data for individual companies (see Cell Notes for this category).

[103] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard. We note that the U.S. Census Bureau withheld publication of the number of firms that operated with sales/value of shipments/revenue in all categories of revenue less than $500,000 to avoid disclosing data for individual companies (see Cell Notes for the sales/value of shipments/revenue in these categories). Therefore, the number of firms with revenue that meet the SBA size standard would be higher than noted herein. We also note that according to the U.S. Census Bureau glossary, the terms receipts and revenues are used interchangeably, *see* https://www.census.gov/glossary/#term_ReceiptsRevenueServices.

[104] 47 CFR § 76.901(d).

[105] S&P Global Market Intelligence, S&P Capital IQ Pro, U.S. MediaCensus, *Operator Subscribers by Geography* (last visited May 26, 2022).

[106] S&P Global Market Intelligence, S&P Capital IQ Pro, *Top Cable MSOs 12/21Q* (last visited May 26, 2022); S&P Global Market Intelligence, Multichannel Video Subscriptions, Top 10 (April 2022).

[107] 47 CFR § 76.901(c).

[108] S&P Global Market Intelligence, S&P Capital IQ Pro, U.S. MediaCensus, *Operator Subscribers by Geography* (last visited May 26, 2022).

[109] S&P Global Market Intelligence, S&P Capital IQ Pro, *Top Cable MSOs 12/21Q* (last visited May 26, 2022).

21. *Cable System Operators (Telecom Act Standard).* The Communications Act of 1934, as amended, contains a size standard for a "small cable operator," which is "a cable operator that, directly or through an affiliate, serves in the aggregate fewer than one percent of all subscribers in the United States and is not affiliated with any entity or entities whose gross annual revenues in the aggregate exceed $250,000,000."[110] For purposes of the Telecom Act Standard, the Commission determined that a cable system operator that serves fewer than 498,000 subscribers, either directly or through affiliates, will meet the definition of a small cable operator.[111] Based on industry data, only six cable system operators have more than 498,000 subscribers.[112] Accordingly, the Commission estimates that the majority of cable system operators are small under this size standard. We note however, that the Commission neither requests nor collects information on whether cable system operators are affiliated with entities whose gross annual revenues exceed $250 million.[113] Therefore, we are unable at this time to estimate with greater precision the number of cable system operators that would qualify as small cable operators under the definition in the Communications Act.

22. *All Other Telecommunications.* This industry is comprised of establishments primarily engaged in providing specialized telecommunications services, such as satellite tracking, communications telemetry, and radar station operation.[114] This industry also includes establishments primarily engaged in providing satellite terminal stations and associated facilities connected with one or more terrestrial systems and capable of transmitting telecommunications to, and receiving telecommunications from, satellite systems.[115] Providers of Internet services (e.g. dial-up ISPs) or Voice over Internet Protocol (VoIP) services, via client-supplied telecommunications connections are also included in this industry.[116] The SBA small business size standard for this industry classifies firms with annual receipts of $40 million or less as small.[117] U.S. Census Bureau data for 2017 show that there were 1,079 firms in this industry that operated for the entire year.[118] Of those firms, 1,039 had revenue of less than $25 million.[119] Based

[110] 47 U.S.C. § 543(m)(2).

[111] *FCC Announces Updated Subscriber Threshold for the Definition of Small Cable Operator*, Public Notice, DA 23-906 (MB 2023) (*2023 Subscriber Threshold PN*). In this Public Notice, the Commission determined that there were approximately 49.8 million cable subscribers in the United States at that time using the most reliable source publicly available. *Id.* This threshold will remain in effect until the Commission issues a superseding Public Notice. *See* 47 CFR § 76.901(e)(1).

[112] S&P Global Market Intelligence, S&P Capital IQ Pro, *Top Cable MSOs 06/23Q* (last visited Sept. 27, 2023); S&P Global Market Intelligence, Multichannel Video Subscriptions, Top 10 (April 2022).

[113] The Commission does receive such information on a case-by-case basis if a cable operator appeals a local franchise authority's finding that the operator does not qualify as a small cable operator pursuant to § 76.901(e) of the Commission's rules. *See* 47 CFR § 76.910(b).

[114] *See* U.S. Census Bureau, *2017 NAICS Definition*, "*517919 All Other Telecommunications,*" https://www.census.gov/naics/?input=517919&year=2017&details=517919.

[115] *Id.*

[116] *Id*.

[117] *See* 13 CFR § 121.201, NAICS Code 517919 (as of 10/1/22, NAICS Code 517810).

[118] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEREVFIRM, NAICS Code 517919, https://data.census.gov/cedsci/table?y=2017&n=517919&tid=ECNSIZE2017.EC1700SIZEREVFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[119] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard. We also note that according to the U.S. Census Bureau glossary, the terms receipts and revenues are used interchangeably, *see* https://www.census.gov/glossary/#term_ReceiptsRevenueServices.

on this data, the Commission estimates that the majority of "All Other Telecommunications" firms can be considered small.

23. *Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing*. This industry comprises establishments primarily engaged in manufacturing radio and television broadcast and wireless communications equipment.[120] Examples of products made by these establishments are: transmitting and receiving antennas, cable television equipment, GPS equipment, pagers, cellular phones, mobile communications equipment, and radio and television studio and broadcasting equipment.[121] The SBA small business size standard for this industry classifies businesses having 1,250 employees or less as small.[122] U.S. Census Bureau data for 2017 show that there were 656 firms in this industry that operated for the entire year.[123] Of this number, 624 firms had fewer than 250 employees.[124] Thus, under the SBA size standard, the majority of firms in this industry can be considered small.

24. *Semiconductor and Related Device Manufacturing*. This industry comprises establishments primarily engaged in manufacturing semiconductors and related solid state devices.[125] Examples of products made by these establishments are integrated circuits, memory chips, microprocessors, diodes, transistors, solar cells and other optoelectronic devices.[126] The SBA small business size standard for this industry classifies entities having 1,250 or fewer employees as small.[127] U.S. Census Bureau data for 2017 show that there were 729 firms in this industry that operated for the entire year.[128] Of this total, 673 firms operated with fewer than 250 employees.[129] Thus under the SBA size standard, the majority of firms in this industry can be considered small.

25. *Software Publishers.* This industry comprises establishments primarily engaged in computer software publishing or publishing and reproduction.[130] Establishments in this industry carry out

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[120] *See* U.S. Census Bureau, *2017 NAICS Definition, "334220 Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing,*" https://www.census.gov/naics/?input=334220&year=2017&details=334220.

[121] *Id*.

[122] *See* 13 CFR § 121.201, NAICS Code 334220.

[123] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 334220, https://data.census.gov/cedsci/table?y=2017&n=334220&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[124] *Id*. The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[125] *See* U.S. Census Bureau, *2017 NAICS Definition, "334413 Semiconductor and Related Device Manufacturing,"* https://www.census.gov/naics/?input=334413&year=2017&details=334413.

[126] *Id.*

[127] *See* 13 CFR § 121.201, NAICS Code 334413.

[128] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 334413, https://data.census.gov/cedsci/table?y=2017&n=334413&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[129] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[130] *See* U.S. Census Bureau, *2017 NAICS Definition, "511210 Software Publishers,"* https://www.census.gov/naics/?input=511210&year=2017&details=511210.

operations necessary for producing and distributing computer software, such as designing, providing documentation, assisting in installation, and providing support services to software purchasers.[131] These establishments may design, develop, and publish, or publish only.[132] The SBA small business size standard for this industry classifies businesses having annual receipts of $47 million or less as small.[133] U.S. Census Bureau data for 2017 indicate that 7,842 firms in this industry operated for the entire year. [134] Of this number 7,226 firms had revenue of less than $25 million.[135] Based on this data, we conclude that a majority of firms in this industry are small.

26. *Internet Service Providers (Non-Broadband).* Internet access service providers using client-supplied telecommunications connections (e.g., dial-up ISPs) as well as VoIP service providers using client-supplied telecommunications connections fall in the industry classification of All Other Telecommunications.[136] The SBA small business size standard for this industry classifies firms with annual receipts of $40 million or less as small.[137] For this industry, U.S. Census Bureau data for 2017 show that there were 1,079 firms in this industry that operated for the entire year.[138] Of those firms, 1,039 had revenue of less than $25 million.[139] Consequently, under the SBA size standard a majority of firms in this industry can be considered small.

27. *Wired Broadband Internet Access Service Providers (Wired ISPs).*[140] Providers of wired broadband Internet access service include various types of providers except dial-up Internet access providers. Wireline service that terminates at an end user location or mobile device and enables the end user to receive information from and/or send information to the Internet at information transfer rates exceeding 200 kilobits per second (kbps) in at least one direction is classified as a broadband connection under the Commission's rules.[141] Wired broadband Internet services fall in the Wired

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[131] *Id.*

[132] *Id.*

[133] *See* 13 CFR § 121.201, NAICS Code 511210 (as of 10/1/22 NAICS Code 513210).

[134] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEREVFIRM, NAICS Code 511210, https://data.census.gov/cedsci/table?y=2017&n=511210&tid=ECNSIZE2017.EC1700SIZEREVFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[135] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard. We also note that according to the U.S. Census Bureau glossary, the terms receipts and revenues are used interchangeably, *see* https://www.census.gov/glossary/#term_ReceiptsRevenueServices.

[136] *See* U.S. Census Bureau, *2017 NAICS Definition, "517919 All Other Telecommunications,"* https://www.census.gov/naics/?input=517919&year=2017&details=517919.

[137] *See* 13 CFR § 121.201, NAICS Code 517919 (as of 10/1/22, NAICS Code 517810).

[138] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEREVFIRM, NAICS Code 517919, https://data.census.gov/cedsci/table?y=2017&n=517919&tid=ECNSIZE2017.EC1700SIZEREVFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[139] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard. We also note that according to the U.S. Census Bureau glossary, the terms receipts and revenues are used interchangeably, *see* https://www.census.gov/glossary/#term_ReceiptsRevenueServices.

[140] Formerly included in the scope of the Internet Service Providers (Broadband), Wired Telecommunications Carriers and All Other Telecommunications small entity industry descriptions.

[141] *See* 47 CFR § 1.7001(a)(1).

Telecommunications Carriers industry.[142] The SBA small business size standard for this industry classifies firms having 1,500 or fewer employees as small.[143] U.S. Census Bureau data for 2017 show that there were 3,054 firms that operated in this industry for the entire year.[144] Of this number, 2,964 firms operated with fewer than 250 employees.[145]

28. Additionally, according to Commission data on Internet access services as of June 30, 2024, nationwide there were approximately 2,204 providers of connections over 200 kbps in at least one direction using various wireline technologies.[146] The Commission does not collect data on the number of employees for providers of these services, therefore, at this time we are not able to estimate the number of providers that would qualify as small under the SBA's small business size standard. However, in light of the general data on fixed technology service providers in the Commission's *2024 Communications Marketplace Report*,[147] we believe that the majority of wireline Internet access service providers can be considered small entities.

29. *Wireless Broadband Internet Access Service Providers (Wireless ISPs or WISPs)*.[148] Providers of wireless broadband Internet access service include fixed and mobile wireless providers. The Commission defines a WISP as "[a] company that provides end-users with wireless access to the Internet[.]"[149] Wireless service that terminates at an end user location or mobile device and enables the end user to receive information from and/or send information to the Internet at information transfer rates exceeding 200 kilobits per second (kbps) in at least one direction is classified as a broadband connection under the Commission's rules.[150] Neither the SBA nor the Commission have developed a size standard specifically applicable to Wireless Broadband Internet Access Service Providers. The closest applicable industry with an SBA small business size standard is Wireless Telecommunications Carriers (except Satellite).[151] The SBA size standard for this industry classifies a business as small if it has 1,500 or fewer

[142] *See* U.S. Census Bureau, *2017 NAICS Definition, "517311 Wired Telecommunications Carriers,"* https://www.census.gov/naics/?input=517311&year=2017&details=517311.

[143] *See* 13 CFR § 121.201, NAICS Code 517311 (as of 10/1/22, NAICS Code 517111).

[144] *See* U.S. Census Bureau, *2017 Economic Census of the United States, Selected Sectors: Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517311, https://data.census.gov/cedsci/table?y=2017&n=517311&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[145] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[146] *See* Federal Communications Commission, Internet Access Services: Status as of June 30, 2024 at 40, Fig. 41 *(IAS Status 2024)*, Industry Analysis Division, Office of Economics & Analytics (May 2025). As of June 30, 2022, FCC Form 477 classifies all fixed wired connections into three mutually exclusive technology categories: (1) Copper Wire, (2) Coaxial Cable (hybrid fiber-coaxial), and (3) Optical Carrier (fiber to the premises). The report can be accessed at https://www.fcc.gov/economics-analytics/industry-analysis-division/iad-data-statistical-reports.

[147] *See Communications Marketplace Report*, GN Docket No. 24-119, FCC 24-136 at 6, paras. 12-13-27, Figs. II.A.1-3. (2024) (*2024 Communications Marketplace Report*).

[148] Formerly included in the scope of the Internet Service Providers (Broadband), Wireless Telecommunications Carriers (except Satellite) and All Other Telecommunications small entity industry descriptions.

[149] Federal Communications Commission, Internet Access Services: Status as of June 30, 2019 at 27, Fig. 30 *(IAS Status 2019)*, Industry Analysis Division, Office of Economics & Analytics (March 2022). The report can be accessed at https://www.fcc.gov/economics-analytics/industry-analysis-division/iad-data-statistical-reports.

[150] *See* 47 CFR § 1.7001(a)(1).

[151] *See* U.S. Census Bureau, *2017 NAICS Definition, "517312 Wireless Telecommunications Carriers (except Satellite),"* https://www.census.gov/naics/?input=517312&year=2017&details=517312.

employees.[152] U.S. Census Bureau data for 2017 show that there were 2,893 firms in this industry that operated for the entire year.[153] Of that number, 2,837 firms employed fewer than 250 employees.[154]

30. Additionally, according to Commission data on Internet access services as of June 30, 2024, nationwide there were approximately 1,157 fixed wireless and 52 mobile wireless providers of connections over 200 kbps in at least one direction.[155] The Commission does not collect data on the number of employees for providers of these services, therefore, we are not able to estimate the number of providers that would qualify as small. However, based on data in the Commission's *2024 Communications Marketplace Report* on the small number of large mobile wireless nationwide and regional facilities-based providers, the dozens of small regional facilities-based providers and the number of wireless mobile virtual network providers in general,[156] as well as on terrestrial fixed wireless broadband providers in general,[157] we believe that the majority of wireless Internet access service providers can be considered small entities.

31. *All Other Information Services.* This industry comprises establishments primarily engaged in providing other information services (except news syndicates, libraries, archives, Internet publishing and broadcasting, and Web search portals).[158] The SBA small business size standard for this industry classifies firms with annual receipts of $47 million or less as small.[159] U.S. Census Bureau data for 2017 show that there were 704 firms in this industry that operated for the entire year.[160] Of those firms, 556 had revenue of less than $25 million.[161] Consequently, we estimate that the majority of firms in this industry are small entities.

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[152] *See* 13 CFR § 121.201, NAICS Code 517312 (as of 10/1/22, NAICS Code 517112).

[153] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, NAICS Code 517312, https://data.census.gov/cedsci/table?y=2017&n=517312&tid=ECNSIZE2017.EC1700SIZEEMPFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[154] *Id*. The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard.

[155] *See IAS Status 2024,* Fig. 41.

[156] *See Communications Marketplace Report*, GN Docket No. 24-119, FCC 24-136 at 45 paras. 56-58. (2024) (*2024 Communications Marketplace Report*).

[157] *Id.* at 11, para. 18.

[158] *See* U.S. Census Bureau, *2017 NAICS Definition, "519190 All Other Information Services,"* https://www.census.gov/naics/?input=519190&year=2017&details=519190.

[159] *See* 13 CFR § 121.201, NAICS Code 519190 (as of 10/1/22, NAICS Codes 519290).

[160] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEREVFIRM, NAICS Code 519190, https://data.census.gov/cedsci/table?y=2017&n=519190&tid=ECNSIZE2017.EC1700SIZEREVFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[161] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard. We note that the U.S. Census Bureau withheld publication of the number of firms that operated with sales/value of shipments/revenue of less than $100,000 to avoid disclosing data for individual companies (see Cell Notes for the sales/value of shipments/revenue in this category). Therefore, the number of firms revenue that meet the SBA size standard would be higher than noted herein. We also note that according to the U.S. Census Bureau glossary, the terms receipts and revenues are used interchangeably, *see* https://www.census.gov/glossary/#term_ReceiptsRevenueServices.

E. Description of Economic Impact and Projected Reporting, Recordkeeping and Other Compliance Requirements for Small Entities

32. The RFA directs agencies to describe the economic impact of the adopted rules on small entities, as well as projected reporting, recordkeeping and other compliance requirements, including an estimate of the classes of small entities which will be subject to the requirement and the type of professional skills necessary for preparation of the report or record.[162]

33. *The Fourth Report and Order* adopts rules that require small and other covered 988 text providers to implement georouting solutions for 988 text messages sent in Short Message Service (SMS) format. Specifically, the *Fourth Report and Order* requires providers to develop the capability to transmit georouting data in a format that is compatible with the Lifeline system and to provide such georouting data for 988 text messages, when available, to the Lifeline Administrator. Small and other providers must provide georouting data with 988 messages sufficient to allow routing of the 988 text message by the Lifeline Administrator to the appropriate crisis center based on the geographic area where the handset is located at the time the 988 text message is sent. The *Fourth Report and Order* adopts a definition of georouting data consistent with that used in the *Third Report and Order*, and requires wireless providers to aggregate location data generated from cell-based location technology 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.

34. In the *Third Further Notice*, the Commission sought comment on the costs and benefits of deploying georouting solutions for text-to-988. We found issues with the cost estimates for small carriers provided by RWA because the data is based on a single carrier and commingles voice-to-988 and text-to-988 georouting. Nonetheless, in the *Fourth Report and Order* we acknowledge the operational limitations of small providers and the added cost georouting may impose, and sought to minimize compliance burdens where practicable. The *Fourth Report and Order* therefore, adopts technology-neutral rules that allow providers the flexibility to leverage georouting solutions identified by the Lifeline Administrator and industry partners. Additionally, the *Fourth Report and Order* adopts an extended time frame for non-nationwide providers, which includes smaller entities, to allow for more time to identify and implement georouting solutions for text-to-988. Non-nationwide covered text providers will have 36 months from the effective date of the order to implement georouting solutions, while nationwide covered text providers must comply within 18 months. The Commission finds that the estimated mortality-reducing public safety benefits resulting from the requirements adopted in the *Fourth Report and Order* far outweigh the anticipated implementation costs.[163]

F. Discussion of Steps Taken to Minimize the Significant Economic Impact on Small Entities, and Significant Alternatives Considered

35. The RFA requires an agency to provide, "a description of the steps the agency has taken to minimize the significant economic impact on small entities . . . including a statement of the factual, policy, and legal reasons for selecting the alternative adopted in the final rule and why each one of the other significant alternatives to the rule considered by the agency which affect the impact on small entities was rejected."[164]

36. The *Fourth Report and Order* considers comments that argue georouting solutions disproportionately impact small rural non-nationwide providers. Specifically, RWA argues that any mandate to require georouting for 988 text messages will have a disproportionately negative impact on small rural non-nationwide providers and therefore proposes several solutions which include: (1)

[162] 5 U.S.C. § 604(a)(5).

[163] *Fourth Report and Order* Section III.G.

[164] 5 U.S.C. §604(a)(6).

voluntary implementation requirements, (2) cost mitigation, and (3) an implementation time frame of 36 months.[165] The Commission acknowledges that small rural non-nationwide providers face operational and financial limitations. Therefore, we adopt rules that are designed to give covered providers, which include small providers, the flexibility to determine the best georouting solution to comply with these rules based on the needs of the provider's network.

37. The Commission concludes that a wholly voluntary implementation of georouting solutions undercuts the Commission's objective to deploy the benefits of georouting for 988 text messages in a timely manner and therefore declines to rely on voluntary implementation for small entities. The record strongly demonstrates that georouting 988 text message will provide significant benefits to individuals with disabilities, disproportionately impacted populations, and rural communities. Therefore, given the clear public interest benefits, we find that deployment and implementation of georouting solutions for 988 text messages should not be optional.

38. Some commenters propose that 988 text messages be sent in other formats and with precise location information. We consider but decline to adopt proposals that would require georouting for Multimedia Message Service (MMS) in favor of enabling the 988 Lifeline to leverage current SMS technology while developing solutions that could adapt to other messaging protocols in the future.[166] The Commission also considers but declines to require that precise location information be transmitted with 988 text messages,[167] and finds that aggregating location data at county-level or wire center boundaries will better protect users' privacy. Likewise, we decline to adopt proposals that would bypass the Lifeline's routing platform or apply the text-to-988 georouting to the Lifeline's specialized service lines because the record reflects that individual crisis centers have varied capability in their ability to provide specialized services.[168]

39. Further, the Commission declines to adopt RWA's proposed cost recovery provisions that seek to mitigate implementation costs of georouting 988 text messages. We expect that our flexible, technology-neutral approach will minimize costs and burdens on non-nationwide providers, and we encourage them to collaborate with our federal partners at SAMHSA to identify georouting solutions best suited for their networks. After consideration we additionally decline to adopt a number of additional proposals that would require specific privacy and cyber security requirements and informed consent mechanisms because they would have the negative effect of discouraging users from contacting the 988 Lifeline.[169] We also decline to expand these rules to Direct Video Calling (DVC) because doing so may result in implementation delays for georouting solutions, and users who are who are deaf, hard-of-hearing, or with a speech disability will benefit from having access to local resources using text-to-988.[170] In adopting these rules, we support voluntary efforts to identify and develop industry-based georouting solutions for 988 text messages by providing a flexible, technology-neutral framework for our requirements.

40. To provide small rural non-nationwide providers with added flexibility, the Commission adopts an implementation timeline of 36 months for non-nationwide providers, as proposed by RWA.

[165] RWA Comments at 1-2.

[166] Intrado Reply at 3, n.6

[167] BRETSA PN Comments at 3.

[168] *Fourth Report and Order* Section III.C.2; CPAC Foundation's Center for Regulatory Freedom (CPAC) Reply at 7.

[169] *Fourth Report and Order* Section III.E; CPAC Reply at 8; Electronic Privacy Information Center and Wildflower Alliance Comments, WC Docket No. 18-336, at 3-4 (filed Apr. 3, 2025) (emphasizing the importance of informed consent).

[170] Accessibility Organizations Comments at 10-11.

This exceeds the six-month timeline originally proposed in the *988 Georouting Third Further Notice* and is twice as long as the 18-month timeline for nationwide providers. We anticipate the longer implementation timeline will enable small providers sufficient time to absorb capital and maintenance costs that are required to develop and implement georouting solutions for 988 text messages.

G. Report to Congress

41. The Commission will send a copy of the *Fourth Report and Order*, including this Final Regulatory Flexibility Analysis, in a report to Congress pursuant to the Congressional Review Act.[171] In addition, the Commission will send a copy of the *Fourth Report and Order*, including this Final Regulatory Flexibility Analysis, to the Chief Counsel for Advocacy of the SBA and will publish a copy of the *Fourth Report and Order*, and this Final Regulatory Flexibility Analysis (or summaries thereof) in the Federal Register.[172]

[171] 5 U.S.C. § 801(a)(1)(A).

[172] *Id.* § 604(b).