

December 9, 2018

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: **Docket 18-336**
Implementation of the National Suicide Hotline Improvement Act of 2018

Dear Commissioners:

On behalf of the National Council for Behavioral Health, I am writing to urge you to designate a 3-digit code as a Behavioral Health and Suicide Crisis Lifeline.

The National Council for Behavioral Health (National Council) is the unifying voice of America's health care organizations that deliver mental health and addictions treatment and services. Together with our 3,000-member organizations serving over 10 million adults, children and families living with mental illnesses and addictions, the National Council is committed to all Americans having access to comprehensive, high-quality care that affords every opportunity for recovery.

The time is now to embrace mental and emotional wellness as a national priority – and to deliver national 3-digit access to crisis intervention services. [Suicide death](#) and related human suffering including overdose and mental illness are at record highs in the US. Despite many valuable efforts, our resources cannot meet this level of need. In this environment and at this crucial juncture we urgently need to expand upon the nation's greatest resource for support and self-help to prevent suicide death.

Three-digit access will:

- Deliver timely and effective crisis intervention services to millions of Americans
- Make it easier to connect people in need with help
- Meet the growing need for crisis intervention
- Help eliminate the stigma of mental health by normalizing help seeking for mental illness with the same priority we deliver for services like fire and rescue, social service referral, and telecommunication referral for people with hearing disabilities

Just last week, the Centers for Disease Control reported that over 40,000 Americans died by suicide last year -- driving the national suicide rate to its highest rate in decades. The CDC also reported that drug overdose deaths had climbed to an all-time high – killing over 70,000 people last year – deaths that often represent a failure of effective mental health intervention, as people facing untreated mental illness resort to “self-medication” through illicit drugs.

The National Suicide Prevention Lifeline saves lives every day, helping thousands of people each day find a way forward through their darkest moments. Highly trained call counselors, at the linked Veterans Crisis Line and over 160 call centers across the nation, help over 2 million Americans and their families each year cope with the challenges of mental wellness and suicidal crisis. The Lifeline network is proof positive of the power of behavioral health and suicide crisis intervention. Extensive, independent research has proven the effectiveness of crisis intervention by the highly trained counselors of the Lifeline affiliates nationwide.

A three-digit access line can help reduce the pervasive stigma associated with mental health challenges. A 3-digit access number for crisis services represents a national recognition that seeking help for behavioral health and suicidal crisis is just as much a part of life as seeking help for fire, for injury, or for other health and wellness needs. Far too many people, including men and young children have been lost to suicide as a direct result of social stigma and discrimination related to mental health struggles.

Finally, the Commission has received comments suggesting that 211 Info be used for 3-digit access to crisis intervention, rather than a dedicated behavioral health and suicide lifeline. We strongly disagree with this suggestion and have great concerns as to the burden it would impose on that network, and the delay and loss of life that could occur as a result— rather than expediting access as Congress intends.

We stand at the threshold of a revolution in improved mental health and wellness services for people throughout the United States. The FCC is poised to take an important step in that revolution by designating a 3-digit Behavioral Health and Suicide Crisis Lifeline.

We are convinced that dedicated three-digit access is a crucial opportunity to reach millions of Americans experiencing behavioral health or suicidal crisis.

The National Council appreciates the opportunity to provide comments on this proposed rule. We welcome any questions or further discussion about the recommendations described here. Please contact Chuck Ingoglia at chucki@thenationalcouncil.org or 202-684-7457 ext. 249. Thank you for your time and consideration.

Sincerely,



Linda Rosenberg, MSW
President & CEO