



JONATHAN SPALTER
President and Chief Executive Officer

February 27, 2020

The Honorable Michael F. Doyle
Chairman
Subcommittee on Communications &
Technology
House Committee on Energy & Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Bob Latta
Ranking Member
Subcommittee on Communications &
Technology
House Committee on Energy & Commerce
2467 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Doyle and Ranking Member Latta:

We appreciate this Subcommittee's focus on resiliency and dependability of our nation's communications networks in today's legislative hearing titled "Strengthening Communications Networks to Help Americans in Crisis."

Network reliability and resiliency for consumers is a core priority for all of USTelecom's carrier members. We understand the critical public safety functions of our networks. When natural disasters temporarily disrupt connectivity, we are committed to restoring service as quickly as possible. When crisis and public health challenges affect the communities we serve, we recognize the importance of our networks in supporting the well-being and security of our customers. We look forward to working with the Subcommittee on this legislation to find durable solutions that ensure our nation's communications infrastructure can securely and reliably serve every American family, community and enterprise in times of crisis.

Suicide Prevention and H.R. 4194, National Suicide Hotline Designation Act

The creation of a three-digit national dialing code for a suicide prevention and mental health crisis hotline is an idea whose time has come. This important public safety initiative leverages the strengths of USTelecom members' existing communications networks, and USTelecom stands ready to work across government, healthcare and community organizations everywhere on the various technical and network upgrades required to make this life-saving platform a reality.

USTelecom is committed to advancing effective solutions to this critical issue so people can more easily access critical mental health resources and receive life-saving help. While the time and costs for implementation will vary based on the network architecture of a particular voice service provider, the overall technical and operational challenges associated with 988 could significantly increase the cost and time needed to implement the 988 3-digit dialing code. USTelecom recognizes the strong support of 988 from the mental health community and is already working diligently to address the technical and operational challenges associated with nationwide implementation of 988, but this specific dialing code will require more equipment to be replaced than other N11 alternatives and because of that, implementation of 988 will take significantly longer than one year.

Due to the importance of this public safety initiative, Congress must mindfully incentivize nationwide coordination of the implementation of the 3-digit dialing code for a suicide prevention

and mental health crisis line. USTelecom urges the Subcommittee to consider the complex technical and operational concerns—for communications providers and the mental health service providers responsible for answering calls for help—to ensure effective implementation of any 3-digit dialing code to be used for mental health crisis intervention. It is critical that when members of the public seeking help in a time of crisis dial a specific number that a dependable mental health professional answers the call in a timely fashion to provide needed care.

H.R. 1289, Preserving Home and Office Numbers in Emergencies (PHONE) Act

USTelecom members are already on the front lines addressing consumer needs when disasters strike local communities. This legislation seeks to restrict reassignment of telephone numbers during a declared major disaster two years beyond the original covered period, and would be a vast departure from years of well-established phone numbering regulation which only holds numbers in reserve for 180 days.

If implemented as currently drafted, this would be a significant, localized, and dynamic modification to phone service providers' numbering systems that must meet strict Federal Communications Commission ("FCC") number utilization rules designed to keep numbers active, not reserved. We fear this language could create a deficit of available numbers and slow access to additional approved numbers or entire area codes during a time of emergency when immediate response is imperative. Additionally, tying the "covered area" to a presidential declaration can create ambiguities, potentially causing it to be over inclusive and open-ended. Declarations often apply to entire counties or states, and would be unmanageable and impractical to allow a two-year reservation period to such a potentially broad swath of territory.

Adjustments of this scale would require large scale, industry-wide coordination with the FCC. The proposed 180 day implementation time is likely insufficient for the FCC and its associated numbering groups (ATIS/INC, NANC) to deliberate, decide, and apply new requirements consistently across the network. Even the seemingly straightforward cancel and re-subscribe provisions would require industry-wide modifications with potentially problematic participation and approval decisions.

Lastly, we urge Congress to consider other, less drastic deviations from existing FCC number utilization rules that would accomplish the same goal. Exploring an alternative approach where Congress directs the FCC to formalize and standardize its current practices in ways that extend phone number assignments via automatic waiver of aging rules for residential telephone subscribers is one possibility that could be implemented through existing channels in a more efficient manner than currently drafted.

Resiliency and H.R. 5926, RESILIENT Networks Act

When it comes to reacting to a service outage, minutes matter. So, when solving problems ranging from tragic natural disasters to isolated service disruptions, administrative processes should not be carriers' first priority.

Many of our members are in the business of providing backhaul service to wireless providers—or are wireless providers—so we know coordination is key for maintaining and restoring service during an outage or disaster. Lockstep coordination between the backhaul provider, wireless providers, and other stakeholders (like power companies) is standard practice for our industry. This coordination has been ongoing for years in various federal government settings to understand inter-dependencies and plan for greater resilience and reliability, particularly after a disaster.

We look forward to continue to work with Chairman Pallone and Representative McNerney so their vision for pre-planned coordination strategies can become law and help communities dealing with disaster as expediently as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Spalter". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Jonathan Spalter
President and CEO
USTelecom – The Broadband Association

Cc: The Honorable Frank Pallone
The Honorable Greg Walden