

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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In the Matter of ) )  
 ) )  
SAMHSA EMERGENCY REQUEST FOR ) CC Docket No. 95-155  
THE PERMANENT REASSIGNMENT ) )  
OF FIVE TOLL-FREE SUICIDE ) )  
PREVENTION NUMBERS ) )  
 ) )  
\_\_\_\_\_) )

To: The Commission

**COMMENTS OF THE KRISTIN BROOKS HOPE CENTER**

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## SUMMARY

Suffering from bipolar disorder, Kristin Brooks Butler took her own life in 1998. Determined to help prevent similar tragedies, and to create a legacy for his wife's life, Reese Butler took the proceeds of her life insurance policy and the sale of their home and founded the Kristin Brooks Hope Center. As he delved into the world of suicide prevention, Mr. Butler discovered that there were hundreds of local organizations sponsoring "hotlines" and other counseling services to those in need, but no national means to tie these groups together. The numbers were often difficult to remember and thinly publicized.

To mend this flaw in the American suicide prevention fabric, Mr. Butler started 888-SUICIDE to serve as a national hotline that same year. He organized the hundreds of small local organizations into a connected national group by routing calls received by the national number to the appropriate local counseling center based on the originating location of the inbound call. The following year, in 1999, KBHC and Mr. Butler expanded the service to the even more recognizable 800-SUICIDE. In the eight years since KBHC was founded, Mr. Butler has added 12 more help lines to this network, including 877-SUICIDA, 877-VET2VET, 800-GRADHLP, 800-PPDMOMS, the Hope Center's signature hotline 800-442-HOPE, and many more. Collectively, these help lines have handled more than two million calls.

Today, this life-saving edifice built by Mr. Butler is at risk. Ironically, the threat comes from two telecommunications carriers - Patriot Communications and McLeodUSA - that seek to seize the toll-free numbers KBHC uses to provide suicide prevention services. These carriers are motivated by profit. They seek to take KBHC's suicide prevention numbers and transfer them to a more lucrative customer. Which customer could inspire Patriot and McLeodUSA to threaten to shut down such an important and beneficent set of help lines?

Shockingly, it is a bureaucracy of the federal government, in the form of the Substance Abuse and Mental Health Services Administration. SAMHSA thinks it knows better how to run 800-SUICIDE and so wants to take over KBHC's toll-free numbers.

Having watched McLeodUSA seize KBHC's numbers, and Patriot threaten to turn them off on January 9, 2007 if KBHC does not acquiesce in transferring all its numbers to Patriot, SAMHSA has declared an "emergency" and asked the FCC to move five of the most important numbers to SAMHSA before Patriot makes good on its threat against KBHC. In making this request, SAMHSA did not tell the FCC that the numbers are operated by KBHC, or that KBHC has held them for 8 years, or that the "emergency" is totally a false contrivance of Patriot and McLeod. In fact, SAMHSA's request did not even acknowledge the existence of KBHC. Nor did SAMHSA tell KBHC about its request to the FCC. Instead, SAMHSA asked the FCC to waive its public notice requirements and transfer KBHC's numbers to SAMHSA privately, without any opportunity for KBHC or the public to explain the truth.

The FCC should decline SAMHSA's invitation to endorse and reward the unlawful actions of two regulated carriers that intentionally breached the FCC's rules for their own gain. Rather, the FCC should immediately direct the Resp Org who has seized KBHC's numbers, McLeodUSA, to release the numbers and allow KBHC to port them to the toll free service provider of its choice, as the FCC rules require. With that simple order, the "emergency" will be ended and KBHC and SAMHSA can work together to ensure that the crucial suicide prevention services that KBHC offers with the support of SAMHSA can continue uninterrupted and uncompromised. The FCC can then proceed to investigate and punish the unlawful acts of Patriot and McLeod, which led to the supposed "emergency" in the first place.

