

December 10, 2018

Federal Communications Commission (FCC)
445 12th Street, SW
Washington, D.C. 20554

Re: WC Docket 18-336 No. 18-336, CC Docket No. 92-105

To Whom It May Concern:

The Movement Advancement Project (MAP) is writing to submit comments regarding the implementation of the National Suicide Hotline Improvement Act, currently reviewed by the Federal Communications Commission (FCC). We appreciate the opportunity to provide comments as FCC issues a formal recommendation on implementing an N11 code for the National Suicide Prevention Lifeline (“NSPL” or “Lifeline”).

MAP's mission is to provide independent and rigorous research, insight and communications that help speed equality and opportunity for LGBT and all people. MAP works to ensure that all people have a fair chance to pursue health and happiness, earn a living, take care of the ones they love, be safe in their communities, and participate in civic life. This work includes issues pertaining to the provision of critical resources needed around the country to support those struggling with mental health, depression, and risk of suicide.

For many LGBT youth and young adults, mental health concerns and suicide are serious problems: lesbian, gay, and bisexual youth seriously contemplate suicide at almost three times the rate of heterosexual youth, while 37% of transgender adults reported making a suicide attempt prior to the age of 25. And despite a growing awareness surrounding suicide, the Centers for Disease Control reported last year that the national suicide rate rose 24% from 1999 to 2016.

We are therefore greatly encouraged by Congress’s passage of the National Suicide Hotline Improvement Act (P.L. 115-233), which tasks the FCC with studying the feasibility of establishing an N11 code for the NSPL. We believe this will help increase access to this life-saving resource. In addition, FCC can include recommendations for improving the Lifeline generally, which could include “improved infrastructure and operations” (3(a)(2)(B)(ii)(II)) as well as provide input on how a N11 dialing code could affect suicide prevention (3(a)(2)(B)(i)).

MAP is grateful for FCC’s efforts in helping to save lives across the country, and MAP urges the FCC to include a need for specialized suicide prevention services for LGBT youth, when compiling its final recommendations. As the NSPL would see its call volume increase rapidly with the introduction of an N11 number, MAP recommends that organizations like The Trevor Project be involved in training counselors in local centers so that LGBT youth can receive the specialized care that is needed in times of crisis. In addition, we suggest that FCC recommend that NSPL can divert calls to hubs of excellence, like The Trevor Project, who have the resources and expertise to address the needs of this population. Currently, NSPL is able to divert veteran

populations to receive more specialized care, and we believe it is critically important to do the same for LGBT youth.

The National Suicide Hotline Improvement Act creates an important opportunity to significantly reduce the suicide rate in the United States, and we thank the FCC for their commitment to address this important issue. Please include in the FCC's final recommendations specific and specialized suicide prevention services for LGBT youth.

Sincerely,

A handwritten signature in black ink, appearing to read 'Logan S. Casey', with a long horizontal flourish extending to the right.

Logan S. Casey, Ph.D.
Policy Researcher
The Movement Advancement Project