



December 10, 2018

Federal Communications Commission

Submitted via fcc.gov

**RE: Comments on Implementation of the National Suicide Hotline Improvement Act  
WC Docket 18-336 No. 18-336, CC Docket No. 92-105**

To whom it may concern,

Equality North Carolina writes today to comment in response to the implementation of the National Suicide Hotline Improvement Act, currently under review by the Federal Communications Commission (FCC). Equality North Carolina works to secure equality and justice for lesbian, gay, bisexual, transgender and queer (LGBTQ) North Carolinians.

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”). We are greatly encouraged by Congress’s passage of the National Suicide Hotline Improvement Act (P.L. 115-233), and are grateful for FCC’s efforts in helping to save lives across the country.

On behalf of Equality North Carolina and our members and supporters, we urge the FCC to recommend the provision of specialized services for LGBTQ suicide prevention services by diverting calls to trained counselors, like those from The Trevor Project, the nation’s largest organization providing suicide prevention services to LGBTQ youth. Our comments incorporate by reference the comments submitted by The Trevor Project.

The National Suicide Hotline Improvement Act tasks the FCC with studying the feasibility of establishing an N11 code for the NSPL, which we believe 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).

When compiling its final recommendations, Equality North Carolina urges the FCC to include a need for specialized suicide prevention services for LGBTQ youth. As Senator Orrin Hatch, the Act’s original sponsor, offered in a floor statement:

**Securing equal rights and justice for lesbian, gay, bisexual, transgender, and queer North Carolinians**

**P.O. Box 28768 • Raleigh, N.C. 27611-8768 • tel (919) 829-0343 • fax (919) 827-4573 • [enc@equalitync.org](mailto:enc@equalitync.org) • [www.equalitync.org](http://www.equalitync.org)**

The prevalence of suicide, especially among LGBT teens, is a serious problem that requires national attention. No one should feel less because their gender identity or because their orientation. They deserve our unwavering love and support. They deserve our validation and the assurance that not only is there a place for them in this society but that it is far better off because of them. These young people need us, and we desperately need them.

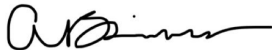
Despite a growing awareness surrounding suicide, the Center for Disease Control reported last year that the national suicide rate rose 24% between 1999 and 2016. The LGBTQ community is disproportionately impacted, as lesbian, gay, and bisexual youth seriously contemplate suicide at almost three times the rate of heterosexual youth, while 37% of transgender adults reported making a suicide attempt prior to the age of 25.

Because the NSPL would see its call volume increase rapidly with the introduction of an N11 number, we recommend that organizations like The Trevor Project could train counselors in local centers so that LGBTQ youth can receive the specialized care that's 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 LGBTQ 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 addressing this important issue.

If you have any questions about our comments and recommendations, please contact Ames Simmons at [ames@equalitync.org](mailto:ames@equalitync.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Ames Simmons', written over a light gray rectangular background.

Ames Simmons, JD  
Policy Director  
Equality North Carolina