

LGBT Technology Partnership

February 14, 2020

Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Implementation of the National Suicide Hotline Improvement Act of 2018
WC Docket No. 18-336, CC Docket No. 92-105**

Dear Ms. Dortch:

The LGBT Technology Partnership (“LGBT Tech”) respectfully submits these initial comments addressing the Federal Communications Commission’s (“FCC”) Notice of Proposed Rulemaking In the Matter of Implementation of the National Suicide Hotline Improvement Act of 2018.¹ In this proceeding, the Federal Communications Commission proposes to designate 988 as a simple, easy-to-remember, 3-digit dialing code for a national suicide prevention and mental health crisis hotline. The FCC is proposing that all telecommunications carriers and interconnected VoIP providers be required to implement 988 in their networks within 18 months. The FCC seeks comment on these proposals and related issues, such as technical barriers to implementation and costs. LGBT Tech, in its comments below, aims to highlight the unique importance of a 3-digit suicide prevention hotline for the LGBTQ community and recommend that the FCC strongly recommend that any such 3-digit hotline include specialized and tailored services for LGBTQ mental health and suicide prevention.

I. INTRODUCTION

LGBT (*Lesbian, Gay, Bisexual, & Transgender*) Tech encourages the continued early adoption and use of cutting-edge, new and emerging technologies by providing information, education and strategic outreach for LGBT communities. We are a national, nonpartisan group of LGBT organizations, academics and high technology companies whose mission is to engage with critical technology and public policy leaders for strategic discussions at all levels. LGBT Tech empowers LGBT communities and individuals, and ensures that media, telecom and high technology issues of specific concern to LGBT communities are addressed in public policy conversations. LGBT Tech works with individuals and communities and engages in research, education, volunteerism, and partnerships to provide cutting-edge technology and resources to

¹ See *In the Matter of Implementation of the National Suicide Hotline Improvement Act of 2018, Notice of Proposed Rulemaking, FCC 19-128, WC Docket No. 18-36 (Released December 16, 2019)*.

improve the lives of LGBTQ individuals, especially those that are disadvantaged in order to improve access, increase inclusion, ensure safety and empower entrepreneurship for LGBTQ communities around technology.

II. MENTAL HEALTH AND SUICIDE PREVENTION ISSUES ARE OF SPECIAL IMPORTANCE TO THE LGBTQ COMMUNITY

Suicide is an epidemic in the LGBTQ community. Study after study shows that LGBTQ youth are more vulnerable to self-harm and suicide than other communities. According to recent research,² LGBTQ adolescents are more likely than other kids their age to try to kill themselves. Sexual minority youth were more than three times as likely to attempt suicide as heterosexual peers. Transgender youth were at highest risk, nearly six times as likely to attempt suicide as heterosexual peers. Overall, sexual minority youth were 3.5 times as likely to attempt suicide as heterosexual peers. Transgender adolescents were 5.87 times more likely, gay and lesbian adolescents were 3.71 times more likely and bisexual youth were 3.69 times more likely than heterosexual peers to attempt suicide.

Even more sobering, according to The Trevor Project³:

- Suicide is the 2nd leading cause of death among young people ages 10 to 24.
- LGB youth seriously contemplate suicide at almost three times the rate of heterosexual youth.
- LGB youth are almost five times as likely to have attempted suicide compared to heterosexual youth.
- Of all the suicide attempts made by youth, LGB youth suicide attempts were almost five times as likely to require medical treatment than those of heterosexual youth.
- Suicide attempts by LGB youth and questioning youth are 4 to 6 times more likely to result in injury, poisoning, or overdose that requires treatment from a doctor or nurse, compared to their straight peers.
- In a national study, 40% of transgender adults reported having made a suicide attempt. 92% of these individuals reported having attempted suicide before the age of 25.3
- LGB youth who come from highly rejecting families are 8.4 times as likely to have attempted suicide as LGB peers who reported no or low levels of family rejection.
- 1 out of 6 students nationwide (grades 9–12) seriously considered suicide in the past year.
- Each episode of LGBT victimization, such as physical or verbal harassment or abuse, increases the likelihood of self-harming behavior by 2.5 times on average.

² See <https://www.reuters.com/article/us-health-lgbt-teen-suicide/lgbt-youth-at-higher-risk-for-suicide-attempts-idUSKCN1MI1SL>

³ See <https://www.thetrevorproject.org/resources/preventing-suicide/facts-about-suicide/>

These statistics show the importance of mental health and suicide resources for LGBTQ individuals, especially adolescents. These resources can and do make a difference. According to Dana Rofey, an associate professor of psychiatry and pediatrics at the Children's Hospital of Pittsburgh at the University of Pittsburgh Medical Center. "There are protective factors, such as having support from the family, a safe school environment, and a safe and supportive work environment ***as well as access to psychological and medical care.***"⁴(*emphasis added*) As such, we agree with the FCC that "designation and implementation of 988 as a simple, easy-to-remember 3- digit dialing code nationwide will increase the convenience and immediacy of access to life-saving suicide prevention and mental health crisis services." Establishment of a national 3-digit hotline for mental services and suicide prevention will have an especially important impact on the LGBTQ community and will be a particularly vital resource for LGBTQ individuals in distress. As part of this proceeding, the FCC should recommend that any such national hotline include specialized and tailored services for LGBTQ mental health and suicide prevention to ensure that the unique issues that lead to increased suicide rates amongst LGBTQ individuals are being adequately addressed when LGBTQ individuals call this hotline.

As such, we completely agree with the Trevor Project in their initial comments, "we urge the FCC to recommend the provision of specialized services for LGBTQ suicide prevention by diverting calls to counselors who are supplementally trained to address the particular needs of LGBTQ people, such as The Trevor Project's counselors... When compiling its final recommendations, The Trevor Project urges FCC to emphasize the need for specialized suicide prevention services for LGBTQ youth."

III. CONCLUSION

LGBT Tech applauds the FCC's proposal to designate 988 as a simple, easy-to-remember, 3-digit dialing code for a national suicide prevention and mental health crisis hotline. The establishment of this number will undoubtedly help individuals in crisis get access to help and resources more efficiently and with less barriers than current systems. However, it is important that as part of any proposal for the establishment of this number the FCC recommend that any such national hotline include specialized and tailored services for LGBTQ mental health and suicide prevention to ensure that the unique issues that lead to increased suicide rates amongst LGBTQ individuals are being adequately addressed through this hotline.

Respectfully submitted,

Carlos Gutierrez

Carlos Gutierrez
Head of Legal and Policy Affairs
LGBT Technology Partnership

⁴ See <https://www.reuters.com/article/us-health-lgbt-teen-suicide/lgbt-youth-at-higher-risk-for-suicide-attempts-idUSKCN1MI1SL>