



April 15, 2021

The Honorable Jessica Rosenworcel
Acting Chairwoman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Docket No. 18-336
Texting to 988 to Expand Access to Lifeline

Dear Chairwoman Rosenworcel:

We, as organizations dedicated to improving the lives of people who experience mental health and suicidal crises, would like to express our gratitude for your proposal that the FCC consider making the life-saving support and resources of the National Suicide Prevention Lifeline accessible through texting to 988. As you articulated so well in your statement: "We have a mental health crisis in this country, especially among young people, and we need to find accessible ways to reach them when they need help." We could not agree more.

Suicide remains the second leading cause of death among youth and young adults, ages 10-34.ⁱ LGBTQ youth are nearly five times as likely to have attempted suicide compared to heterosexual youth,ⁱⁱ and the suicide rate for Black children ages 5-12 is about two times higher compared with white children. In addition, adolescents with symptoms of psychosis are nearly 70 times more likely to attempt suicide than their peers.ⁱⁱⁱ **In order to reach youth and adolescents who are at risk, as well as other marginalized and underserved populations, it is vital that text messaging be adopted as a foundational capability of 988.**

Nearly 95% of teens have access to smart phones and say that texting is the primary way that they connect.^{iv} In addition, a Johns Hopkins survey reveals that Blacks text at a rate 2.24 times higher than whites and Hispanics text 1.56 times more.^v Finally, households that make less than \$30,000 annually send twice as many text messages as those that make over \$75,000.^{vi} Finally, text messaging is critical for people who are deaf, hard of hearing, deafblind, or have speech disabilities. These data points reinforce the critical nature of including texting to 988 to provide life-saving access to the Lifeline for communities who have long experienced health and other disparities.

It is a basic expectation of the general public, and particularly youth, that emergency services have texting capabilities. Indeed, individuals in crisis have been texting requests for support from the Lifeline with no marketing of such texting capability. Texting with trained crisis counselors 24 hours a day, seven days a week is currently available through Lifeline's specialized services. However, significant support is needed to expand text capacity to Lifeline network call centers and reach the full potential of text-to-988 services.

We ask that you continue to support facilitating text to 988, but urge that you support the enhanced resources necessary to ensure capacity to effectively answer texts to 988. When the FCC designated 988, it specifically noted the issue of lack of resources and cited the work of its federal partners who recognized this issue. As the FCC regulates to include text, we hope that the agency will work with federal partners and the Biden Administration as they make requests to Congress to ensure adequate resources for this vital service.

In closing, we would like to again applaud the FCC's significant role in making 988 a reality and urge you to continue your work to ensure universal access to this life-saving crisis line. If you have any questions or would like to discuss further, please contact Angela Kimball at akimball@nami.org.

Sincerely,

American Foundation for Suicide Prevention
Mental Health America
National Alliance on Mental Illness
The Trevor Project
Vibrant Emotional Health

ⁱ CDC. (2019). 10 Leading Causes of Death, United States. Atlanta, GA: U.S. Department of Health and Human Services.

ⁱⁱ CDC. (2019). Sexual Identity, Sex of Sexual Contacts, and Health-Risk Behaviors Among Students in Grades 9-12: Youth Risk Behavior Surveillance. Atlanta, GA: U.S. Department of Health and Human Services.

ⁱⁱⁱ Pew Research Center. (2018, May). Teens, Social Media, and Technology 2018. Retrieved from Pew Research Center: <https://www.pewresearch.org/internet/2018/05/31/teens-social-media-technology-2018/>

^{iv} Tatiana Falcone, M., & Timmons-Mitchell, PhD., J. (2013). Psychosis and Suicidality in Adolescents. *Psychiatric Times*. Vol. 30, No. 12.

^v Upland. (2021, April 15). Johns Hopkins Survey Finds Strong Potential for Text Message Interventions. Retrieved from Upland: <https://uplandsoftware.com/mobile-messaging/resources/blog/johns-hopkins-survey-finds-strong-potential-text-message-interventions/>

^{vi} *Ibid.*