

March 31, 2022

The Honorable Lina Khan, Chairwoman
Mr. Samuel Levine, Director Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20530

Subject: Support for FCC March 22, 2022 Letter Request to Investigate Crisis Text Line, Inc.

I'm writing to join FCC Commissioner Brendan Carr in requesting investigation of non-profit Crisis Text Line, Inc., and to offer any assistance that I can provide.

I was a volunteer at Crisis Text Line from April 2020 to August 21, 2021. In June 2020, I began researching their data and consent practices and tried to achieve reform from inside the organization. I was terminated, but have continued my advocacy, including creating a website in early January this year: www.reformcrisistextline.com.

From the website I would highlight my August 21, 2021 open letter and opinion paper, and my November 24, 2021 letter to the Journal of Medical Internet Research. The letter to JMIR raises ethical concerns, including consent, with the paper *Protecting User Privacy and Rights in Academic Data-Sharing Partnership: Principles From a Pilot Program at Crisis Text Line*.¹

I can confirm all of Commissioner Carr's concerns. I would add that volunteers have not provided consent. Also, in 2020 nearly half of all persons texting the service were 17 years old or younger.² Many are children² or adults under guardianship. Finally, opaque data practices make it hard to know what other data sources are being connected to persons using the service, for example within the queue triage algorithms.³ These added considerations compound already problematic claims of consent.

Sincerely,



Tim Reiersen (he/him, pronounced RYE er sun)

copy to: Commissioner Brendan Carr (Brendan.Carr@fcc.gov)

REFERENCES

1. Pisani AR, Kanuri N, Filbin B, Gallo C, Gould M, Lehmann LS, Levine R, Marcotte JE, Pascal B, Rousseau D, Turner S, Yen S, Ranney ML. J Med Internet Res 2019 Jan 17;21(1):e11507. <https://www.jmir.org/2019/1/e11507/>
2. <https://web.archive.org/web/20220204221658/https://www.crisistextline.org/blog/2021/03/23/teen-life-interrupted/>
3. <https://research.crisistextline.org/what-we-learned-from-training-a-machine-learning-model-to-detect-suicidal-risk-2c65f1d4d9eb>