Is your Phone System FCC e911 Compliant?

Here is what you need to know about Kari's Law and RAY BAUM'S Act 911 Direct Dialing, Notification, and Dispatchable Location Requirements!

If you are not familiar with Kari's Law and RAY BAUM'S Act, you should be! Since the passing of the new laws for MLTS (Multi-Line Telephone System), Vox Tandem has been preparing our 3CX Communication business phone systems to be in compliance with the changes. 3CX is a software-based phone system that works with various IP phones and SIP trunks that can be installed on-premise or in a cloud. Voice over internet protocol (IP or VoIP) is a technology that allows you to use the internet to make phone calls, whether in the office or remotely from home. Regardless of where you choose to work, all of our business phone systems have been updated to support a direct-dial 911 right out-of-the-box. Not only is Vox Tandem compliant, but you can also rest easy knowing that our systems help keep your company and employees safe.

In August 2019, the Commission adopted rules implementing two federal laws that strengthen emergency calling: Kari's Law and Section 506 of RAY BAUM'S Act.

Kari's Law – Direct Dialing and Notification for MLTS

Kari's Law is named in honor of Kari Hunt, who was killed by her estranged husband in a motel room in Marshall, Texas in 2013. Ms. Hunt's 9-year-old daughter tried to call 911 for help four times from the motel room phone, but the call never went through because she did not know that the motel's phone system required dialing "9" for an outbound line before dialing 911.

Congress responded by enacting Kari's Law in 2018. Kari's Law requires direct 911 dialing and notification capabilities in multi-line telephone systems (MLTS), which are typically found in enterprises such as office buildings, campuses, and hotels. The statute provides that these requirements take effect on February 16, 2020, two years after the enactment date of Kari's Law. In addition, Kari's Law and the federal rules are forward-looking and apply only with respect to MLTS that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020.

Under the statute and the Commission's rules, MLTS manufacturers and vendors must pre-configure these systems to support direct dialing of 911—that is, to enable the user to dial 911 without having to dial any prefix or access code, such as the number 9. In addition, MLTS installers, managers, and operators must ensure that the systems support 911 direct dialing.

The Commission's rules also implement the notification requirement of Kari's Law, which is intended to facilitate building entry by first responders. When a 911 call is placed on a MLTS system, the system must be configured to notify a central location on-site or off-site where someone is likely to see or hear the notification. Examples of notification include conspicuous on-screen messages with audible alarms for security desk computers using a client application, text messages for smartphones, and email for administrators. Notification shall include, at a minimum, the following information:

1. The fact that a 911 call has been made;
2. A valid callback number; and
3. The information about the caller's location that the MLTS conveys to the public safety answering point (PSAP) with the call to 911; provided, however, that the notification does not have to include a callback number or location information if it is technically infeasible to provide this information. (47 CFR § 9.3.)

Compliance date (MLTS direct dialing and notification) and Exemption for Legacy MLTS: Kari's Law and the Commission's rules are forward-looking and do not apply with respect to any MLTS that is manufactured, imported, offered for first sale or lease, first sold or leased, or installed on or before February 16, 2020. (See 47 CFR § 9.17(b).)

All other MLTS (i.e., systems manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020) must meet the following compliance date:

Feb. 17, 2020:*

MLTS manufacturers, importers, sellers, and lessors:

- May not manufacture or import for use in the United States, or sell or lease or offer to sell or lease in the United States, an MLTS, unless the system is pre-configured so that when it is properly installed in accordance with the MLTS rules, a user may directly initiate a call to 911 from any station equipped with dialing facilities, without dialing any additional digit, code, prefix, or post-fix, including any trunk-access code such as the digit 9, regardless of whether the user is required to dial such a digit, code, prefix, or post-fix for the other calls. (47 CFR § 9.16(a)(1).)

MLTS installers, managers, and operators:

- May not install, manage, or operate for use in the United States an MLTS, unless the system is configured so that a user may directly initiate a call to 911 from any station equipped with dialing facilities, without dialing any additional digit, code, prefix, or post-fix, including any trunk-access code such as the digit 9, regardless of whether the user is required to dial such a digit, code, prefix, or post-fix for other calls. (47 CFR § 9.16(b)(1).)
- Shall, in installing, managing, or operating an MLTS for use in the United States, configure the system to provide MLTS notification to a central location at the facility where the system is installed or to another person or organization regardless of location, if the system is able to be configured to provide the notification without an improvement to the hardware or software of the system. (47 CFR § 9.16(b)(2).) MLTS notification must meet

the following requirements:
    - It must be initiated contemporaneously with the 911 call, provided that it is technically feasible to do so; and
    - It must not delay the call to 911; and
    - It must be sent to a location where someone is likely to see or hear it. (47 CFR § 9.16(b)(2).)

RAY BAUM'S Act – Dispatchable Location for MLTS

Under Section 506 of RAY BAUM'S Act, the Commission has adopted rules to ensure that "dispatchable location" is conveyed with 911 calls to dispatch centers, regardless of the technological platform used, including 911 calls from MLTS. Dispatchable location means a location delivered to the PSAP with a 911 call that consists of the validated street address of the calling party, plus additional information such as suite, apartment, or similar information necessary to adequately identify the location of the calling party. (47 CFR § 9.3.) For further information on dispatchable location requirements applicable to non-MLTS, including compliance timelines, see the **Dispatchable Location web page**.

Compliance Dates (MLTS Dispatchable Location): The Commission's dispatchable location rules for MLTS apply to all MLTS that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed *after* February 16, 2020. While the dispatchable location rules apply to the same entities subject to Kari's Law, the Commission established separate deadlines for MLTS to come into compliance with the dispatchable location rules. As outlined below, MLTS are subject to compliance deadlines of January 6, 2021 and January 6, 2022, depending on the nature of the device from which the MLTS 911 call originates.*

2021

Jan. 6, 2021

Provision of dispatchable location from MLTS on-premises, fixed devices:

- On-premises, fixed devices associated with an MLTS must provide automated dispatchable location with 911 calls. (47 CFR § 9.16(b)(3)(i).)

Dispatchable location obligations for MLTS manufacturers, importers, sellers, lessors, installers, managers, and operators:

- MLTS manufacturers, importers, sellers, and lessors may not manufacture, import, sell, lease, or offer to sell or lease an MLTS unless the system has the capability, after proper installation in accordance with the rules, of providing the automated dispatchable location of the caller to the PSAP with 911 calls from on-premises, fixed devices. (47 CFR §§ 9.16(a)(2) and 9.16(b)(3)(i).)
- MLTS installers may not install a system unless it is configured so that it is capable of being programmed with and conveying the automated dispatchable location of the caller to the PSAP with 911 calls from on-premises, fixed devices. (47 CFR § 9.16(b)(3)(i).)

- MLTS managers and operators may not manage or operate a system unless it is configured so that the automated dispatchable location of the caller is conveyed to the PSAP with 911 calls from on-premises, fixed devices. (47 CFR § 9.16(b)(3)(i).)

2022

Jan. 6, 2022

Provision of dispatchable location or alternative location information from MLTS on-premises, non-fixed devices and off-premises devices:

- On-premises, non-fixed devices associated with an MLTS must provide automated dispatchable location to the appropriate PSAP when technically feasible; otherwise they must provide either dispatchable location based on end-user manual update, or alternative location information that meets the requirements below.

Alternative location option for MLTS on-premises, non-fixed devices:

- Alternative location information may be coordinate-based, and it must be sufficient to identify the caller's civic address and approximate in-building location, including floor level, in large buildings. (47 CFR §§ 9.16(b)(3)(ii) and 9.3.)
- Off-premises devices associated with an MLTS must provide to the appropriate PSAP automated dispatchable location if technically feasible; otherwise, they must provide either dispatchable location based on end user manual update, or enhanced location information that meets the requirements below.

Enhanced location option for MLTS off-premises devices:

- Enhanced location information may be coordinate-based, and it must consist of the best available location that can be obtained from any available technology or combination of technologies at reasonable cost. (47 CFR § 9.16(b)(3)(iii).)

Dispatchable location obligations for MLTS manufacturers, importers, sellers, lessors, installers, managers, and operators:

- MLTS manufacturers, importers, sellers, and lessors may not manufacture, import, sell, lease, or offer to sell or lease an MLTS unless the system has the capability, after proper installation in accordance with the rules, of providing the dispatchable location of the caller as specified in section 9.16(b)(3)(ii) and (iii) to the PSAP with 911 calls from on-premises, non-fixed devices and from off-premises devices. (47 CFR §§ 9.16(a)(2) and 9.16(b)(3)(ii), (iii).)
- MLTS installers may not install an MLTS unless it is configured so that it is capable of being programmed with and conveying the dispatchable location of the caller as specified in section 9.16(b)(3)(ii) and (iii) to the PSAP with 911 calls from on-premises, non-fixed

devices and from off-premises devices. (47 CFR § 9.16(b)(3)(ii), (iii).)
- MLTS managers and operators may not manage or operate an MLTS unless it is configured so that the dispatchable location of the caller as specified in section 9.16(b)(3)(ii) and (iii) is conveyed to the PSAP with 911 calls from on-premises, non-fixed devices and from off-premises devices. (47 CFR § 9.16(b)(3)(ii), (iii).)

*The Public Safety and Homeland Security Bureau is providing the above timeline to help regulated entities comply with the rules. This timeline does not reference all of the relevant rules, does not include the full text of the rules, and does not modify or supersede the specific text of any rule that is referenced. The Commission retains the discretion to adopt case-by-case approaches, where appropriate, that may differ from the approach in this timeline. Any decision regarding a particular regulated entity will be based on the statutes and any relevant rules. The full text of the 911 rules can be found here.

**The new rules became effective on January 6, 2020, although the compliance deadlines for the rules vary. In addition, Sections 9.16(b)(3)(i), (ii), and (iii) of the rules contain information collections under the Paperwork Reduction Act (PRA). Compliance with these sections will not be required until after the relevant information collections are approved by the Office of Management and Budget. Following such approval, the Commission will publish a document in the Federal Register announcing the compliance dates for these requirements and will update this timeline as necessary to reflect these dates.

Resources

911 Requirements for MLTS – 47 C.F.R. Part 9, Subpart F

Frequently Asked Questions – MLTS FAQs

Small Entity Compliance Guide: https://www.fcc.gov/document/implementing-karis-law-and-section-506-ray-baums-act-0

The FCC will closely monitor any complaints about alleged violations of these 911 rules.

- Consumers may file a complaint via the Consumer Complaint Center.
- Public Safety Answering Points (PSAPs), also known as 911 call centers, and other public safety entities may request support from the Public Safety and Homeland Security Bureau and notify it of problems or issues affecting the provision of emergency services through the Public Safety Support Center.

Archive

Report and Order – Implementing Kari's Law and Section 506 of RAY BAUM'S Act (Aug. 1, 2019)

Erratum – Implementing Kari's Law and Section 506 of RAY BAUM'S Act (PSHSB Dec. 2, 2019)

Public Notice – Announcing Jan. 6, 2020 Effective Date for Rules Implementing Kari's Law and Section 506 of RAY BAUM'S Act (PSHSB Dec. 5, 2019)

Notice of Proposed Rulemaking – Implementing Kari's Law and Section 506 of RAY BAUM'S Act (Oct. 26, 2018)

Notice of Inquiry – FCC to Examine 911 Capabilities of Enterprise Communications Systems (Sept. 26, 2017)

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