

New 911 Calling Requirements for Enterprise Phone Systems: Are You Ready?



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On August 2, 2019, the Federal Communications Commission (“FCC” or “Commission”) released a [Report and Order](#) on 911 calling capability requirements that affect virtually anyone in the enterprise calling platform ecosystem, whether sellers, lessors, installers, managers and operators of what the FCC refers to as multi-line telephone systems (“MLTS”). The new rules also affect providers of Voice over Internet Protocol (“VoIP”) services. The rules implement the requirements of two federal statutes: Kari’s Law Act of 2017, which requires MLTS to be capable of direct 911 dialing and on-site notifications, and Section 506 of the RAY BAUM’S Act of 2018, which requires the Commission to “consider adopting rules to ensure that the dispatchable location is conveyed with a 9-1-1 call” over various types of calling platforms and technologies.

Kari’s Law

What Is a Multi-Line Telephone System (“MLTS”)?

MLTS encompasses virtually all multi-line enterprise and small office calling platforms, including premises and network-based PBX systems, Centrex, VoIP, Hybrid and Key Telephone Systems. MLTS includes cloud-based IP technology and over-the-top applications, as well as systems owned or leased by governmental agencies and non-profit entities, as well as for profit businesses.

Direct Dialing Requirement

Beginning February 16, 2020 –

Manufacturers, Sellers, and Lessors may NOT manufacture, import, offer for first sale or first lease an MLTS, unless it is pre-configured so that when installed, a user may direct dial 911 without the requirement of an initial step, such as dialing 9 to obtain an outside line.

Installers, Managers and Operators may NOT install, manager or operate an MLTS, unless it is configured so that a user may direct dial 911.

Location Notification Capability

Beginning February 16, 2020 –

Installers, Operators and Managers must ensure that equipment installed, managed or operated, is configured so that when a 911 call is placed, notification is provided to a central location at the facility where the system is installed or to another person or organization outside the location, unless the provision of that capability would require an improvement to the system hardware or software.

Notification Capability Requirements

Initiation of Notification : The initiation of the notification must be contemporaneous with the call to 911, unless it is technically infeasible to provide contemporaneous notification due to the configuration of the MLTS equipment.

Likelihood of Receipt of Notice : The notification must be sent to a location on-site or off-site where someone is likely to hear or see the notification.

Content of Notification : The notification must include: (1) the fact that a 911 call was made; (2) a valid callback number; and (3) with limited exceptions, the same location and callback information that is conveyed to the public safety answering point (“PSAP”) with the call to 911.

RAY BAUM'S Act

Pursuant to RAY BAUM'S Act, the FCC adopted requirements across platforms and technologies, including MLTS and VoIP, for provision to PSAPs of "Dispatchable Location" when a 911 call is placed, i.e., validated street address, plus suite, apartment or similar information, such as floor and quadrant. The point of these changes is to allow emergency responders to pinpoint the location from where a 911 call was placed, particularly in office building and campus environments, where a phone number might otherwise be associated with a particular address or central location, rather than the actual location from where the call originated.

Recognizing that the technical ability to provide Dispatchable Location information will vary depending on whether a technology is fixed (such as location-fixed desk or hotel phones or fixed VoIP service used at particular location) or non-fixed (such as on-premises or off-premises portable soft phones and nomadic or mobile VoIP services), as described below, the Commission adopted one-year and two-year deadlines from the rules' effective date to allow for implementation. In addition, the manner of compliance with the Dispatchable Location requirements also differs by technology. Taken together, this provides some complexity on how the Dispatchable Location requirements are implemented that varies across these parameters. That said, unlike the Kari's Act rules which are effective in February 2020, the Dispatchable Location rules will not be effective until approved by the Office of Management, hence these one-year and two-year compliance periods will not begin to run until such approval is received.

One (1) Year from the Effective Date of the Dispatchable Location rules:

Fixed MLTS (e.g. hotel phones or fixed desk phones that each connect to a single access point) – Manufacturers, sellers/lessors, installers, operators must ensure that MLTS are configured to automatically provide:

Validated street address, plus suite, apartment or similar information (e.g. floor, quadrant).

Fixed VoIP – Providers must ensure that service automatically provides:

Validated street address, plus suite, apartment or similar information (e.g., floor, quadrant).

Location may be determined using the most recent information obtained by a VoIP provider identifying the physical location of the customer (known as "Registered Location"), (to the extent a physical address conveys a street address that is validated).

Two (2) Years from Effective Date of Dispatchable Location Rules:

On-Premises, Non-Fixed MLTS (e.g., softphones or mobile handsets that connect to multiple Wi-Fi access points and can move from one location to another within a building) must automatically provide:

Validated street address, plus suite, apartment or similar information (floor, quadrant) when technically feasible. If NOT technically feasible, provider may:

Rely on MLTS end user to provide or confirm Dispatchable Location information manually, e.g., by responding to a system prompt; or

Provide alternative location information, such as coordinate-based information, sufficient to identify the caller's address and approximate in-building location, including floor level, in large buildings.

Off-Premises, Non-Fixed MLTS (e.g., remote VPN access) – MLTS must automatically provide:

Validated street address, plus suite, apartment or similar information (floor, quadrant) if technically feasible. If NOT technically feasible, provider may:

Rely on MLTS end user to provide or confirm Dispatchable Location information manually, e.g., by responding to a system prompt; or

Provide enhanced location information, which may be coordinate-based, consisting of the best available location that can be obtained from any available technology or combination of technologies at reasonable cost.

Non-Fixed VoIP (i.e., nomadic or mobile VoIP) – Service must automatically provide:

Validated street address, plus suite, apartment or similar information when technically feasible. If NOT technically feasible, provider may:

Rely on end user to provide or confirm Dispatchable Location information manually, e.g., by responding to a system prompt; or

Provide alternative location information, such as coordinate-based information, consisting of the best available location that can be obtained from any available technology or combination of technologies at a reasonable cost. Alternative location information should be sufficient to identify the caller's address and approximate in-building location, including floor level, in large buildings.

If neither of the above methods are attainable using good faith efforts, the VoIP provider can route a 911 call to a national emergency call center for the operator to ask the caller directly for their location.

Outbound-Only Interconnected VoIP – Service must automatically provide:

Validated street address, plus suite, apartment or similar information when technically feasible. If not technically feasible, provider may:

Rely on end user to provide or confirm Dispatchable Location information manually, e.g., by responding to a system prompt; or

Provide alternative location information, such as coordinate-based information, consisting of the best available location that can be obtained from any available technology or combination of technologies at a reasonable cost. Alternative location information should be sufficient to identify the caller's address and approximate in-building location, including floor level, in large buildings.

Immunity from Liability

As a final note, the Commission also extended the immunity shield granted to emergency providers, fixed telephony, commercial wireless, and VoIP providers in existing law to MLTS sellers/lessors, installers, operators and managers in connection with the delivery

of 911 emergency information to PSAPs.

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