



Federal Communications Commission

Public Safety and Homeland Security Bureau



FCC 911 Regulation

AFCEA Conference

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Scope of FCC 911 Regulation

- FCC regulates provision of and support for 911 by:
 - Telecommunications Carriers
 - Commercial Mobile Radio Services
 - Interconnected VoIP
 - Telecommunications Relay Services
 - Multi-Line Telephone Systems
 - Mobile Satellite
 - “Covered” 911 Service Providers (aggregators of 911 traffic for delivery to PSAPs)
- FCC regulations include requirements for 911 call routing, provision of location information, reliability of critical 911 network elements, outage reporting, and 911 access for people with disabilities
- FCC does not regulate PSAPs or federal/state/local government entities that are responsible for receiving and responding to 911 calls

Kari's Law

- Kari's Law Act of 2017, Pub. L. No. 115-127 (codified at 47 U.S.C. § 623) -- enacted February 16, 2018
- Requires direct dialing of 911 from Multi-Line Telephone Systems (MLTS) without having to dial a prefix
- When an MLTS 911 call is made, the system must provide notification, such as to a front desk or security office
- MLTS Definition: Kari's Law defines MLTS by cross-referencing Section 6502 of the Middle Class Tax Relief and Job Creation Act of 2012. Under that definition, an MLTS is:
 - “[A] system comprised of common control units, telephone sets, control hardware and software and adjunct systems, including network and premises based systems, such as Centrex and VoIP, as well as PBX, Hybrid, and Key Telephone Systems (as classified by the Commission under part 68 of title 47, Code of Federal Regulations), and includes systems owned or leased by governmental agencies and non-profit entities, as well as for profit businesses.”

Kari's Law -- Scope

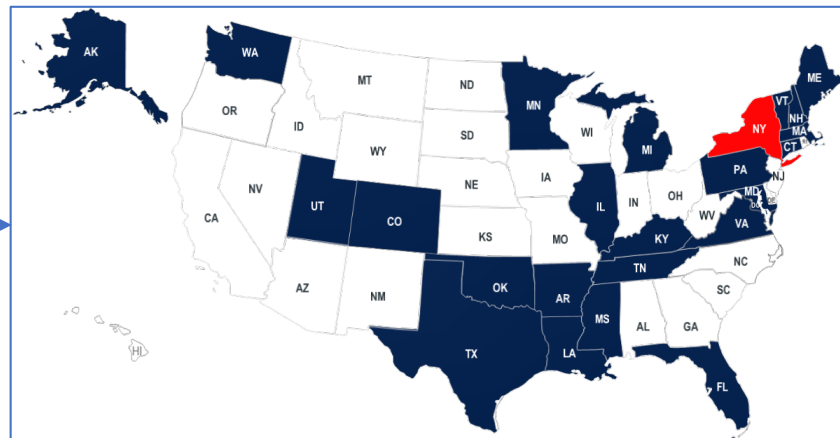
- Who is covered: persons engaged in the business of “manufacturing, importing, selling, leasing, installing, managing, or operating” an MLTS
- MLTS manufacturers, importers, sellers, and lessors
 - Must ensure that the system is **pre-configured** to support 911 direct dialing
- MLTS installers, managers, and operators
 - Must ensure that the system is **configured** to support 911 direct dialing
 - Must ensure that the system is configured to support **notification** to a “central location at the facility where the system is installed or to another person or organization regardless of location, if this can be done without an improvement to the hardware or software of the system”

Kari's Law -- Scope

- New vs. legacy systems: The federal version of Kari's Law applies only to MLTS manufactured, imported, offered for first sale or lease, first sold or leased, or installed **after February 16, 2020**
 - Legacy systems (those manufactured, imported, sold, or leased, or installed on or before Feb. 16, 2020) are not subject to the federal requirements
- Effect on state MLTS regulation: The Federal version of Kari's Law does not alter state MLTS laws where the exercise of state authority is not inconsistent with Federal law

States with
existing MLTS
laws and
regulations

Source: Intrado



FCC Implementation of Kari's Law

- Report and Order adopted August 2019 (FCC 19-76)
 - Direct dialing: MLTS must enable users to dial 911 directly, without having to dial a prefix such as “9” to reach an outside line
 - Notification: MLTS must provide notification, such as to a front desk or security office, when a 911 call is made
- Rules only apply to MLTS manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020
- Summary of FCC regulations implementing Kari's Law: <https://www.fcc.gov/mlts-911-requirements>

Notification Content

- Notification must include, at a minimum:
 - The fact that a 911 call has been made
 - A valid callback number
 - The same information about the caller's location that the MLTS conveys to the PSAP with the 911 call
 - However, notification does not have to include a callback number or location information if it is technically infeasible to provide this information
- No specific requirements for notification format
 - Notification may be via on-screen notification, text message, email, or any other means that is likely to be seen or heard

Notification Timing and Destination

- Notification timing
 - Must be initiated contemporaneously with the 911 call, provided that it is technically feasible to do so
 - Must not delay the call to 911
- Notification destination
 - Must be sent to a location where someone is likely to see or hear it
 - The notification location may be on-site or off-site – the purpose is to send notification to someone who can assist first responders in gaining access to the facility where the MLTS 911 call originated
 - The notification location is not required to be continuously staffed or monitored

RAY BAUM's Act – Section 506

- Part of Consolidated Appropriations Act of 2018, Pub. L. 115-141, enacted March 23, 2018
- Section 506: within 18 months (by September 2019), the FCC must “conclude a proceeding to consider adopting rules to ensure that the dispatchable location is conveyed with a 9-1-1 call, regardless of the technological platform used and including with calls from multi-line telephone systems”
 - “Dispatchable location” is defined as “the street address of the calling party, and additional information such as room number, floor number, or similar information necessary to adequately identify the location of the calling party”
 - “911 call” is defined to include voice calls or messages sent by other means

RAY BAUM'S Act – Section 506

FCC Implementation

- Report and Order adopted August 2019 (FCC 19-76)
- FCC implemented Section 506 of RAY BAUM'S Act by adopting dispatchable location requirements for 911 calls from the following services:
 - MLTS subject to Kari's Law
 - Fixed telephony
 - Interconnected Voice over Internet Protocol (VoIP)
 - Internet-based Telecommunications Relay Services (TRS), and
 - Mobile text
- These rules do not change wireless E911 location accuracy rules already in place
- Summary of FCC regulations implementing RAY BAUM's Act: <https://www.fcc.gov/911-dispatchable-location>

RAY BAUM'S Act – Section 506

FCC Dispatchable Location Requirements

- 911 Calls From Fixed Devices
 - Must provide automated dispatchable location to the PSAP for all 911 calls
 - Compliance deadline: January 6, 2021 (one year from rules effective date)
- 911 Calls From Non-fixed (Mobile or Nomadic) Devices
 - Must provide automated dispatchable location to the PSAP for individual 911 calls if technically feasible
 - If not technically feasible, must provide other actionable location information, e.g., coordinate-based information, sufficient to identify the caller's approximate location
 - Compliance deadline: January 6, 2022 (two years from rules effective date)

RAY BAUM'S Act – Section 506

MLTS Dispatchable Location Requirements

- The FCC's dispatchable location requirements for MLTS apply only to post-February 2020 MLTS covered by Kari's Law, not to legacy MLTS
- MLTS dispatchable location requirements depend on the type of device making the 911 call
 - On-premises, fixed MLTS devices must provide automated dispatchable location
 - On-premises, non-fixed MLTS devices must provide automated dispatchable location if technically feasible. If not feasible, they must provide actionable location information sufficient to identify the caller's approximate location (e.g., floor level, building quadrant)
 - Off-premises MLTS devices must provide automated dispatchable location, if technically feasible. If not feasible, they must provide either dispatchable location based on end-user manual update or the best available location information



Thank you!

Questions?