

Frequently Asked Questions

Dispatchable Location Requirements for Fixed Telephony, Interconnected VoIP, Telecommunications Relay Services (TRS), and Mobile Text

In August 2019, pursuant to Section 506 of RAY BAUM'S Act, the Commission adopted rules to ensure that "dispatchable location" information (meaning the validated street address, plus additional information such as suite, apartment, or similar information necessary to adequately identify the location of the calling party) is conveyed with 911 calls so that first responders can be quickly dispatched to the caller's location. The rules apply improved location requirements to 911 calls from fixed telephone service, interconnected Voice over Internet Protocol (VoIP) services, and Telecommunications Relay Services (TRS), and they apply new location requirements to calls from multi-line telephone systems (MLTS) and mobile texting services.

- **Report and Order:** The Commission's Report and Order in PS Docket Nos. 18-261 and 17-239 and GN Docket No. 11-117 can be accessed [here](#).
- **Compliance Deadlines:** Information on compliance deadlines for the dispatchable location rules can be accessed on the Commission's [Dispatchable Location web page](#).
- **MLTS Information:** Information on MLTS, including dispatchable location requirements for MLTS, can be accessed on the Commission's [MLTS web page](#).

The following are responses to some frequently asked questions about these dispatchable location requirements. The Public Safety and Homeland Security Bureau (Bureau) is providing these FAQs to help interested parties understand and comply with the rules. This document does not replace, supersede, or modify the rules. The Commission retains the discretion to adopt case-by-case approaches, where appropriate, that may differ from the responses in this document. Any decision regarding the applicability of the dispatchable location rules to a particular entity will be based on the statutes and any relevant rules. The full text of the 911 rules can be found [here](#).

Definition of "Dispatchable Location"

Q. What is "dispatchable location"?

A. Dispatchable location is the validated street address of the 911 calling party, plus additional information such as suite, apartment, or similar information necessary to adequately identify the location of the caller.

Q. What is "automated dispatchable location"?

A. Automated dispatchable location means dispatchable location that is generated automatically, without action by the 911 caller.

Q. Under what circumstances does providing a 911 caller's "dispatchable location" require information beyond the caller's validated street address?

A. The definition of "dispatchable location" is functional and varies significantly depending on the environment from which a 911 call originates and the amount of information needed to adequately

identify the caller's location. For 911 calls placed from multi-story buildings or campus environments, dispatchable location will typically require specific floor and room information in addition to the street address. On the other hand, for 911 calls placed from many small businesses, a validated street address alone may constitute dispatchable location because it provides first responders all the information they need to quickly locate the caller.

Q. What is "alternative location information"?

A. Alternative location information may be coordinate-based (latitude, longitude, and, where available, vertical location), and it must be sufficient to identify the caller's civic address and approximate in-building location, including floor level, in large buildings.

Q. What is "enhanced location information"?

A. 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.

Fixed Telephone Service

Q. What is the location requirement for 911 calls from fixed telephones?

A. Fixed telephone services must provide automated dispatchable location with all 911 calls.

Interconnected Voice over Internet Protocol (VoIP)

Q. What are the location information requirements for interconnected VoIP?

A. It depends on whether the service is fixed or non-fixed.

- Fixed interconnected VoIP services must provide automated dispatchable location with all 911 calls.
- Non-fixed interconnected VoIP services must provide automated dispatchable location if technically feasible. Otherwise, they must provide either (1) Registered Location information manually updated by the user, or (2) alternative location information as defined in the rules. As a last resort where no location information is available, a VoIP provider may route the 911 call to a national emergency call center, so long as the provider has made a good-faith effort to obtain location data from all available alternative location sources.

Q. What is the difference between fixed and non-fixed interconnected VoIP service?

A. Fixed VoIP services provide the functional equivalent of fixed telephone service by means of a device that connects to a single access point and is not capable of being moved by the end user. Non-fixed VoIP services enable the end user to connect a handset or other IP-enabled device to multiple access points. Non-fixed services may also be described as "nomadic" or "mobile" VoIP.

Q. Can a fixed interconnected VoIP service provider use customer-generated Registered Location to provide automated dispatchable location?

A. Yes. If customer-generated Registered Location is used, it must include a validated street address. In addition, the VoIP provider must deliver the Registered Location automatically to the PSAP at the time the 911 call is made, without additional action by the caller.

Q. What are “outbound-only” interconnected VoIP services?

A. Outbound-only interconnected VoIP services are services that allow users to make outbound calls to the public switched telephone network (PSTN), even if they do not support inbound calling from the PSTN to the VoIP user.

Q. Are outbound-only interconnected VoIP services subject to the new 911 location rules for interconnected VoIP providers?

A. Yes. Although outbound-only VoIP services were not previously covered by the Commission’s 911 requirements for interconnected VoIP, the Commission’s August 2019 order extended 911 requirements, including the new location requirements, to outbound-only interconnected VoIP providers.

Q. Do the new rules expand the options for notifying interconnected VoIP customers of limitations on their E911 service?

A. Yes. Prior to the August 2019 order, interconnected VoIP providers were required to notify customers of E911 service limitations by distributing warning stickers or labels. The new rules retain this provision but also allow providers to notify existing and new subscribers by “other conspicuous means,” so long as the notification is prominently displayed or highlighted in a manner that makes it likely to be seen by the customer. As an example, inclusion of the notification in the fine print of an online customer agreement *would not* be sufficient.

Internet-based Telecommunications Relay Services (TRS)

Q. What Telecommunications Relay Services are subject to new 911 location requirements?

A. The new requirements apply to Video Relay Service (VRS), Internet Protocol Relay Service (IP Relay), and Internet Protocol Captioned Telephone Service (IP CTS).

Q. What are the location information requirements for TRS?

A. It depends on the service. The TRS rules largely parallel the rules for fixed and non-fixed VoIP, with some important differences based on the nature of each specific service.

- Fixed VRS, IP Relay, and IP CTS must provide automated dispatchable location with all 911 calls.
- Non-fixed VRS, IP Relay, and IP CTS must provide automated dispatchable location, if technically feasible. Otherwise they must provide either (1) Registered Location information manually updated by the user, or (2) alternative location information as defined in the rules. As a last resort where no location information is available, a TRS provider also may route the 911 call to an emergency call center, so long as the provider has made a good-faith effort to obtain location data from all available alternative location sources.

Q. What is the difference between fixed and non-fixed VRS, IP Relay, and IP CTS?

A. Fixed VRS, IP Relay, and IP CTS is not capable of being used from more than one location. Non-fixed VRS, IP Relay, and IP CTS, which may also be described as “nomadic” or “mobile,” is capable of being used from more than one location.

Mobile Text Services

Q. What mobile text services are covered by 911 requirements?

A. Covered mobile text services include all interconnected text messaging services that enable consumers to send and receive text messages from all or substantially all text-capable U.S. telephone numbers, including Short Message Service (SMS) as well as newer text modes such as real-time text (RTT).

Q. What are the 911 location requirements for mobile text services?

A. Mobile text services must provide automated dispatchable location with all 911 text messages routed to a PSAP if technically feasible. Otherwise they must provide either (1) location information manually provided by the end-user, or (2) enhanced location information as defined under the rules, i.e., the best available location that can be obtained from any available technology or combination of technologies at reasonable cost.

Q. To meet the new 911 location requirements, are text providers required to retrofit SMS-based text networks or upgrade legacy SMS-only handsets?

A. No. Although some newer text platforms can provide better location information than SMS, the Commission’s 911 rules do not require retrofitting or upgrading of SMS networks or handsets.