Frequently Asked Questions

911 Direct Dialing, Notification, and Dispatchable Location Requirements for Multi-Line Telephone Systems (MLTS)

In August 2019, the Commission adopted rules to implement two laws enacted to strengthen emergency calling. First, the Commission took action to implement Kari's Law, which requires multi-line telephone systems (MLTS) to enable users to dial 911 directly, without having to dial a prefix (such as a "9") to reach an outside line. Kari's Law also requires MLTS to provide notification, such as to a front desk or security office, when a 911 call is made in order to facilitate building entry by first responders.

Second, 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 new rules apply improved location requirements to MLTS (as well as to fixed telephony, interconnected Voice over Internet Protocol (VoIP) services, Telecommunications Relay Services (TRS), 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 MLTS can be accessed on the Commission's MLTS 911 web page.
- **Dispatchable Location for Other 911-Capable Services**: Information on dispatchable location requirements for fixed telephony, interconnected VoIP services, TRS, and mobile texting services can be accessed on the Commission's Dispatchable Location web page.

The following are responses to some frequently asked questions on the direct dialing, notification, and dispatchable location requirements for MLTS. 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 Kari's Law or RAY BAUM'S Act to a particular entity will be based on the statutes and relevant rules. The full text of the 911 rules can be found here.

General Questions

Q. What are MLTS?

A. MLTS are communications systems typically used in enterprise settings such as hotels, offices, and campuses. Under Kari's Law and RAY BAUM'S Act, an MLTS is defined as "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."

As interpreted by the Commission, this definition of MLTS covers the full range of networked communications systems that serve enterprises, including IP-based and cloud-based systems. It also includes outbound-only MLTS that allow users to make 911 calls but do not enable public safety answering points (PSAPs) to place a return call directly to the 911 caller.

Q. Does Kari's Law apply to all MLTS or are some MLTS grandfathered?

A. Kari's Law applies to all MLTS in the U.S. that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed on or after February 17, 2020. It does not cover existing MLTS that were installed prior to February 17, 2020. However, in some states, existing MLTS that are not covered by the federal version of Kari's Law may be covered by state versions of Kari's Law that were enacted prior to the federal law.

Q. What happens if an MLTS that was manufactured before Feb. 17, 2020 is installed or upgraded after Feb. 17, 2020?

A. An MLTS that was manufactured before February 17, 2020 but is first installed on or after February 17, 2020 would be covered by Kari's Law. If the MLTS was installed before February 17, 2020 but is upgraded on or after February 17, 2020, it could be subject to Kari's Law depending on the magnitude of the upgrade. While not all upgrades trigger coverage by Kari's Law, we generally consider upgrades to core MLTS software or hardware functions to be of sufficient magnitude to bring an MLTS within the scope of the statute and rules.

Q. Since Kari's Law does not apply to pre-February 17, 2020 MLTS, is it still possible that I may have to dial "9" first before calling 911 from a hotel, business, or other enterprise phone system?

A. Yes. Because the statute is not retroactive, some hotels, workplaces, and other locations may have legacy MLTS equipment that still requires dialing an extra digit to call 911. If you are unfamiliar with the phone system in a hotel, office, or other location, it is important that you inquire about how the system handles dialing 911. We also strongly encourage enterprises to include labels or warnings regarding the 911 dialing capabilities of legacy MLTS devices.

Q. What persons or entities associated with an MLTS are covered by Kari's Law?

A. Kari's Law applies to persons engaged in the business of manufacturing, importing, selling, leasing, installing, managing, or operating an MLTS that falls within the scope of the statute.

911 Requirements for MLTS

Q. What are MLTS manufacturers, importers, sellers, and lessors required to do?

A. With respect to direct 911 dialing, MLTS manufacturers, importers, sellers, and lessors must ensure that their MLTS are pre-configured so that, when properly installed in accordance with the rules, a user may directly call 911 without having to dial an additional digit or code, such as the digit 9.

With respect to 911 location information, MLTS manufacturers, importers, sellers, and lessors must ensure that their MLTS are capable, after proper installation, of providing the location of 911 callers to the PSAP as required under the Commission's dispatchable location rules. These rules and applicable deadlines can be accessed here.

Q. What are MLTS installers, managers, and operators required to do?

A. With respect to direct 911 dialing, MLTS installers, managers, and operators must ensure that their MLTS are configured so that a user may directly call 911 without having to dial any additional digit or code, such as the digit 9.

With respect to notification that a 911 call has been made, MLTS installers, managers, and operators must configure their MLTS to provide notification of 911 calls to either (1) a central location at the facility where the system is installed or (2) 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.

With respect to 911 location information, the requirements differ for MLTS installers versus MLTS managers and operators:

- MLTS installers must configure their MLTS so that it is capable of being programmed to convey 911 location information to the PSAP as required under the Commission's dispatchable location rules.
- MLTS managers and operators must configure their MLTS so that 911 location information is conveyed to the PSAP as required under the Commission's dispatchable location rules.
- These rules and applicable deadlines can be accessed here.

MLTS Notification Requirements

Q. When an MLTS 911 call is made, must the notification be simultaneous with the call?

A. The MLTS notification must be initiated simultaneously with the 911 call if it is technically feasible to do so. The notification must not delay the call to 911 under any circumstances.

Q. Does the destination point for the notification have to be continuously staffed or monitored?

A. No. The destination point must be a location where someone is likely to see or hear the notification, but it does not have to be continuously staffed or monitored.

Q. What information must be included in the notification?

A. The notification must convey the fact that a 911 call has been made. If technically feasible, the notification must also contain (1) a valid callback number, and (2) the same caller location information that the MLTS conveys to the PSAP with the 911 call.

Q. Does the Commission require a particular format for notifications?

A. No. Businesses have the flexibility to send the notification by text, email, audio message, or any other form of notification that suits their needs.

Q. The MLTS notification requirement is subject to an exception if providing the notification would require "an improvement to the hardware or software of the system." What constitutes an improvement to the hardware or software of the system?

A. An improvement to the hardware or software of an MLTS includes upgrades to the core systems of the MLTS, as well as substantial upgrades to the software and any software upgrades requiring a significant purchase.

Routing of MLTS 911 Calls

Q. In some enterprises with specialized safety or security needs, the MLTS is configured to route 911 calls to an onsite emergency response team rather than to the local PSAP. Is this permitted under Kari's Law?

A. Kari's Law assumes that MLTS 911 calls will be directed to the local PSAP in the first instance. However, the Bureau is aware that in some enterprises with specialized safety or security needs (e.g., industrial facilities that handle hazardous materials), direct 911 calls are directed to an internal security desk or onsite response team, with the knowledge and consent of the local PSAP. The Bureau does not interpret Kari's Law as requiring such routing arrangements to be changed, but advises enterprises and MLTS managers and operators to consult with state and local 911 authorities.

MLTS 911 Dispatchable Location Requirements

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. What are the dispatchable location requirements for MLTS?

A. It depends on the type of MLTS telephone or device being used to make the call.

- On-premises, fixed devices associated with an MLTS (e.g., a wired desk phone) must provide automated dispatchable location.
- On-premises, non-fixed devices (e.g., a cordless office phone) associated with an MLTS must provide automated dispatchable location if technically feasible. Otherwise they must provide either (1) dispatchable location provided manually by the end user, or (2) alternative location information.
    - Alternative location information may be coordinate-based (latitude and longitude, and where available, vertical location), and must be sufficient to identify the caller's civic address and approximate in-building location, including floor level, in large buildings.
- Off-premises devices associated with an MLTS must provide automated dispatchable location, if technically feasible. Otherwise they must provide either (1) dispatchable location provided manually by the end user, or (2) enhanced location information.
    - Enhanced location information may be coordinate-based, and must consist of the best available location that can be obtained from any available technology or combination of technologies at reasonable cost.

Q. What is the difference between fixed and non-fixed MLTS devices?

A. A fixed MLTS device is a device such as a wired office phone that connects to a single endpoint and cannot be moved to another endpoint by the end user without assistance from a professional installer or network manager. A non-fixed MLTS device (which may be mobile or nomadic) is a device that the end user can move from one endpoint to another without assistance.

Q. What is the difference between on-premises and off-premises MLTS devices?

A. On-premises MLTS devices are devices used on the premises operationally controlled by the enterprise, such as an office building or campus. Off-premises MLTS devices are devices used away from the enterprise-controlled premises, such as MLTS devices used at home by members of a distributed workforce.

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 MLTS 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 MLTS 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. Does the Commission require other location elements besides street address to be validated?

A. No. The Commission only requires validation of street addresses. Validation of other location elements, such as floor and room number, is encouraged but not required.

Complaints

Q. How does one report complaints regarding potential violations of Kari's Law to the Commission?

A. Consumers may file a complaint via the FCC's Consumer Complaint Center. In addition, persons alleging a violation of the rules implementing Kari's Law may file a complaint under the procedures set forth in part 1, subpart E of the Commission's rules. PSAPs and other public safety entities may request support from the Bureau and notify it of problems or issues affecting the provision of emergency services through the Public Safety Support Center.