

# Multi-Line Telephone Systems and You

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# Disclaimer

- These comments do not necessarily reflect the position of the Federal Communications Commission
- The comments are not part of an FCC rulemaking
- Doing (or not) the things discussed here may (or may not) satisfy the proposed requirements of the rulemaking



# Commission Adopts MLTS NPRM

Federal Communications Commission FCC 18-132

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

⊕ In the Matter of )  
 Implementing Kari’s Law and Section 506 of ) PS Docket No. 18-261  
 RAY BAUM’S Act )  
 Inquiry Concerning 911 Access, Routing, and ) PS Docket No. 17-239  
 Location in Enterprise Communications Systems )

**NOTICE OF PROPOSED RULEMAKING**

**Adopted: September 26, 2018** **Released: September 26, 2018**

**Comment Date: [45 days from the date of publication in Federal Register]**  
**Reply Comment Date: [75 days from the date of publication in Federal Register]**

By the Commission: Chairman Pai and Commissioners O’Rielly, Carr, and Rosenworcel issuing separate statements.

# Relevance for SIPNOC audience (you)

34. *Multi-line telephone system.* The *Notice* proposes to define MLTS consistent with Kari’s Law and RAY BAUM’S Act which define MLTS 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.” The *Notice* proposes to interpret this definition to include the full range of networked communications systems that serve enterprises, including circuit-switched and IP-based enterprise systems, as well as cloud-based IP technology and over-the-top applications. We further interpret this definition to include systems that allow outbound calls to 911 without providing a way for the PSAP to place a return call.

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# Who?

- If you build it, you need to do it
- If you buy it, you need to do it
- If you operate it, you need to do it
- What if you have one already that doesn't do it?
  - You need to do it if you don't need a hardware upgrade
  - You need to do it if you don't need a **substantial** software upgrade
  - You need to do it if you don't need a **significant** purchase
- In short, just about everyone needs to build it / offer it / use it

# What do you need to do?

- Direct Dial 911
- Dispatchable Location
- On-site Notification

# Direct Dial 911 – Keri's Law

- No matter what a telephone systems dial pattern is, “911” gets to the PSAP
- Not a requirement, but expectation is current and common dial patters will still work
  - 9,911
  - 8,911
  - *etc.*



# Dispatchable Location

*56. Defining Dispatchable Location.* RAY BAUM’S Act defines “dispatchable location” 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.” [...] We seek comment on this proposal.

# Notification

*19. Applicability and Obligations.* Consistent with Kari's Law, we propose to adopt implementing regulations requiring that a person engaged in the business of installing, managing, or operating MLTS shall, in installing, managing, or operating the system, configure it to provide a notification that a 911 call has been placed by a caller on the MLTS system. The system configuration must provide for the notification to be transmitted 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.

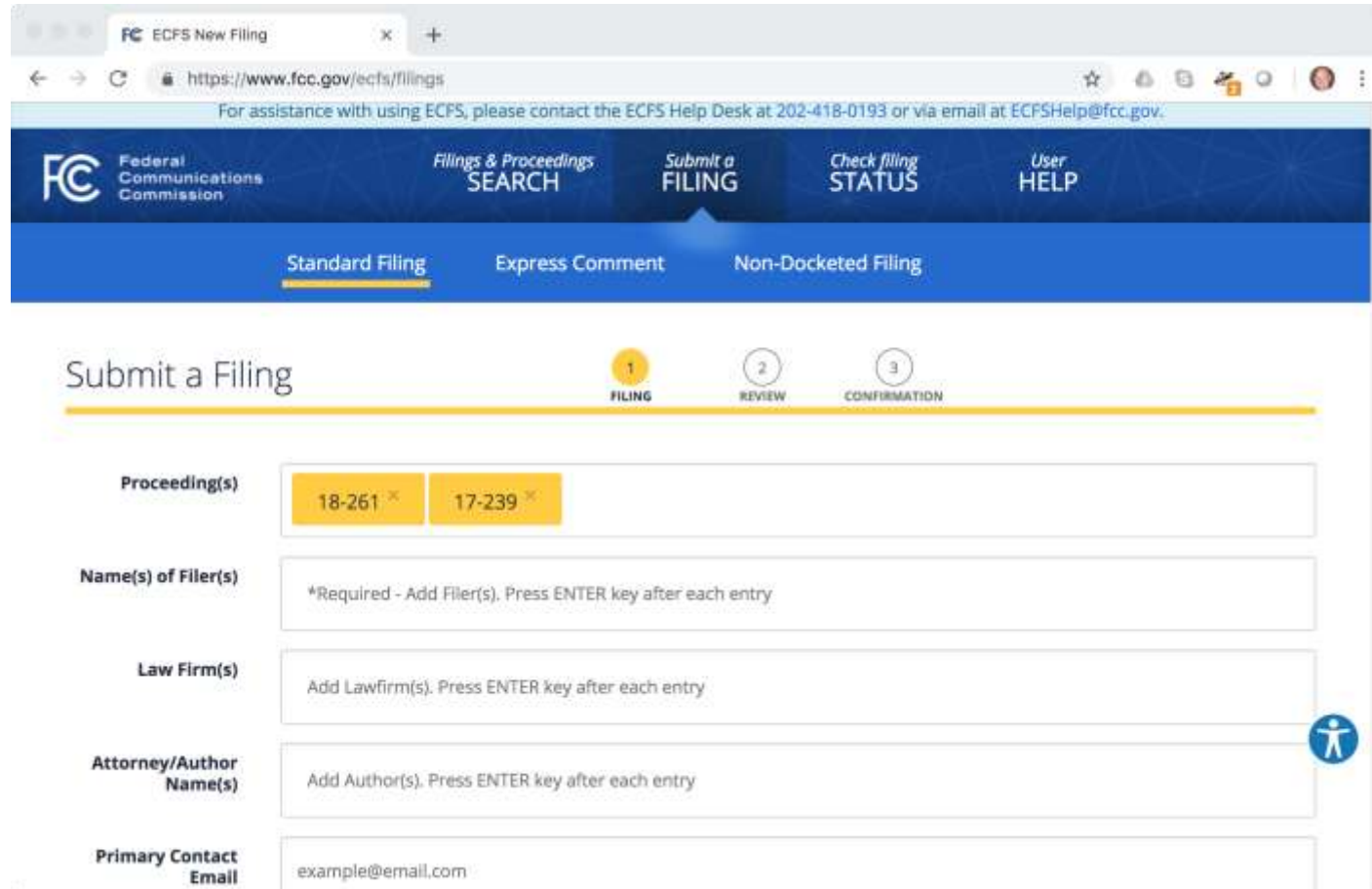
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# Must Provide Notification

- As proposed, **all** MLTS must provide notification to central location
- Typical scenario
  - Campus police
  - Hotel security
  - Enterprise PSAP
- Includes **everyone, no matter how small**
  - IP Centrex
  - Key Systems
- Comments welcome

# Lots of questions in the NPRM!



The screenshot shows the FCC's ECFS (Electronic Case Filing System) interface for submitting a new filing. The browser address bar shows the URL <https://www.fcc.gov/ecfs/filings>. A navigation bar at the top includes the FCC logo, "Federal Communications Commission", and links for "Filings & Proceedings SEARCH", "Submit a FILING" (which is highlighted), "Check filing STATUS", and "User HELP". Below this, there are three sub-links: "Standard Filing" (underlined), "Express Comment", and "Non-Docketed Filing".

The main heading is "Submit a Filing", followed by a progress indicator with three steps: 1. FILING (highlighted in yellow), 2. REVIEW, and 3. CONFIRMATION.

The form fields are as follows:

- Proceeding(s)**: A text input field containing two yellow tags with the numbers "18-261" and "17-239", each with a small 'x' icon to its right.
- Name(s) of Filer(s)**: A text input field with the placeholder text: "\*Required - Add Filer(s). Press ENTER key after each entry".
- Law Firm(s)**: A text input field with the placeholder text: "Add Lawfirm(s). Press ENTER key after each entry".
- Attorney/Author Name(s)**: A text input field with the placeholder text: "Add Author(s). Press ENTER key after each entry". A blue accessibility icon (a person with a white cane) is located to the right of this field.
- Primary Contact Email**: A text input field containing the email address "example@email.com".

# Thank you!

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