



Federal MLTS E-911 Laws and Regulations: Kari's Law and Ray Baum's Act

On August 1, 2019, the Federal Communications Commission (FCC) adopted rules to implement Kari's Law and Section 506 of RAY BAUM'S Act to help Americans reach 911 services more quickly. These new federal regulatory obligations means that Enterprises (Offices, Buildings, Hotels/Motels, Hospitals, Nursing Homes, Schools, Dormitories, Campuses, etc.) operating (MLTS) Multi-Line Telephone Services in the United States are required to provide everyone (employees, customers, visitors, contractors, etc.) using or potentially may use the phone system with the following capabilities:

1. **Direct access to 911** without dialing any prefix such as dialing "9" to access an external line, post-fix, or trunk access code, as required by Kari's Law.
2. **Notify on-site security/ front desk/ management**, whenever 911 is dialed within the Enterprise, as required by Kari's Law.
3. **Provide a specific dispatchable location** with every 911 call, such as building number/ floor/ room or suite number, etc., in addition to a verified street address, as required by Section 506 of Ray Baum's Act.

The rules are applicable to MLTS that is manufactured, imported, offered for first sale or lease, first sold or leased, or installed after **February 16, 2020**. Enterprises with fixed MLTS phones (located in your office, conference room, lobby, hotel/motel room, patient rooms, etc.) are required to comply with the above new requirements by **January 6, 2021**, while businesses with non-fixed MLTS devices on and off-premises (wireless/mobile services) are to fulfill their regulatory obligations no later than **January 6, 2022** (Existing installations without any new upgrades or modifications).

Background

Initially introduced in the Congress in 2015 and re-introduced in 2016, Kari's Law was passed by the Congress and signed into federal law by President Donald J. Trump, on February 16, 2018. Named for Kari Hunt Dunn, the law was championed by her family after she was brutally attacked and killed in a hotel room in 2013. Her 9 years old daughter was unable to reach emergency services after multiple attempts because she didn't know that she had to dial "9" to reach an outside line on the hotel room phone before calling 911 at the hotel where they were staying. Medical examiner and investigators in this incident have determined that, had Kari's daughter been able to reach emergency services, Kari may have survived.

Kari's Law now requires direct dialing of "911" (without having to dial a prefix such as "9", postfix, or trunk access code) be enabled in enterprise/ business environments and directs the FCC to develop necessary 911 calling regulations for the multi-line telephone systems (MLTS) that are commonly used for communications services in buildings, such as offices, hotels, hospitals/ medical practices, nursing homes, schools/ colleges, and most any office campuses. Additionally, the RAY BAUM'S ACT requiring the conveyance of specific dispatchable location to PSAP (Public Safety Access Point) when dialing 911 applies to all businesses. In short, the expansive interpretation of these laws are simply this: if you own or operate a business and employ workers to work in your office/building, allow access to customers or public into your business, and operate a Multi-Line Telephone Service in view of or access to the same, then you must comply with these federal laws and regulations.

What are the consequences of not complying?

- Risk of endangering employees, customers, visitors, and others
- Fines and additional penalties for each day a business remains non-compliant
- Potentially devastating civil liabilities should an emergency or tragedy occur – the victim or family is authorized to sue under the law.



Penalties for Non-Compliance

In addition to facing potentially devastating civil liabilities, should an emergency or tragedy occur, businesses that fail to comply with the law will risk hefty fines and may be subject to additional penalties for each day they remain non-compliant. With Kari's Law now included within the amended Communications Act, the Federal Communications Commission (FCC) has the power to enforce the rules, assign judgments, and collect penalties.

VORADIAN'S Compliance with the new Laws and Regulations

Access to 911 services on the VORADIAN™ Platform by registered endpoints has always been limited to direct dialing of 911. (No prefix, post-fix, or trunk access codes were required). The 911 call alert notification capabilities were already available in our platform, but we have now enhanced this feature with two additional capabilities and functions at the end-user level as follows:

- Once a 911 call is initiated through the VORADIAN Network, a 911 call notification can be sent to an email or SMS address. One or more addresses can be added. To receive notifications via SMS, you must be subscribed to an email-to-text service with your mobile telephone service provider. The SMS address uses the format: [10-digit phone number@mobileserviceprovider.com] For example: 10-digits@txt.att.net (AT&T), 10-digits@vtext.com (Verizon), 10-digits@tmomail.net (T-Mobile), etc.
- Once a 911 call is initiated through Voradian Network, we can automatically initiate a three-way between the 911 dialer, PSAP (Public Safety Access Point), and the designated third party (on-site security, front desk, management, etc.).
- In addition to the notifications and three-way calling features available on our platform, we've added an additional 911 Custom Callback feature. This allows you to add an additional Callback number at the location level for emergency responders to use to connect with you.

As always, there's no additional charge for our enhanced feature services as is the case with all of our upgrades and enhancements of features and functions in the VoradianEdge™ Platform.

Compliance Audit

Complying with the ever-changing laws related to emergency calling is a complicated endeavor. Both large and small enterprises are challenged with the growing remote workers, multiple sites, legacy premise-based equipment, and or cloud-based communications - all adding to the intricacies of ensuring compliance with Federal Laws.

VORADIAN™ can help. Our Free 9-1-1 Federal Mandate Compliance Audit is the best and easiest way for you to ensure compliance with emergency calling laws. Our public safety subject matter experts can identify where you may be failing to comply, related risks and liabilities, and provide you with an individually tailored roadmap to compliance.

Request your audit by emailing us at info@voradian.com or give us a call at **470.300.6263**. A VORADIAN representative will schedule a meeting for you with one of our Public Safety compliance specialists within three business days for an initial conference call.