

ALERT

# FCC Announces Compliance Dates for New E911 Rules Applicable to Multi-Line Telephone Systems and VoIP Providers

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On December 3, 2020, the Federal Communications Commission (FCC or Commission) announced compliance dates for the new E911 requirements for multi-line telephone systems (MLTS) adopted in the FCC's 2019 Report and Order implementing Kari's Law and RAY BAUM'S Act. MLTS manufacturers, importers, sellers, lessors, installers, managers, and operators should be aware of these FCC requirements in connection with their multi-line telephone systems. Providers of interconnected Voice over Internet Protocol (VoIP) services should also be aware of new E911 dispatchable location requirements taking effect soon.

## Background

The FCC's 2019 Report and Order implemented two federal statutes: Kari's Law Act of 2017 (Kari's Law), which required implementation of direct 911 dialing and on-site notification capabilities in MLTS, and Section 506 of RAY BAUM'S Act, which required the FCC to consider adopting rules to ensure that dispatchable location is conveyed with a 911 call, including calls made from MLTS. Several of the rules adopted in the 2019 Report and Order involved information collections that have now been approved by the Office of Management and Budget, and thus the FCC has announced compliance dates for the new rules.

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## Practice Areas

Telecom, Media & Technology

## Direct Dialing and Notification

Kari's Law and the FCC's rules on direct dialing and notification apply to MLTS manufactured, imported, offered for first sale or lease, first sold or leased, or installed after **February 16, 2020**. Specifically, the rules require that the MLTS must be pre-configured such that:

- A user can directly initiate a call to 911 from any station with dialing facilities, without dialing any additional digit, code, or prefix (e.g., the digit 9).
- The system must transmit a 911 notification to a central location at the facility where the system is installed or to another person, contemporaneously with the 911 call.

The notification requirement only applies if the MLTS can be configured to provide such notification without an "improvement to the hardware or software of the system."

## Dispatchable Location

The FCC's rules implementing dispatchable location requirements vary based on the type of device being used on the MLTS.

- For *on-premises, fixed* telephones, the MLTS shall provide automated dispatchable location no later than **January 6, 2021**.
- For *on-premises, non-fixed devices*, the MLTS shall provide automated dispatchable location, when technically feasible, no later than **January 6, 2022**.
- For *off-premises devices*, the MLTS shall provide automatic dispatchable location, if technically feasible, no later than **January 6, 2022**.

These deadlines apply to MLTS installed after **February 16, 2020**. For on-premises, non-fixed devices and off-premises devices, the FCC's rules have exceptions if provision of automated dispatchable location is "not technically feasible." Location information may instead be based on end user manual update or "alternative location information," which is defined as location information sufficient to identify the caller's address and approximate in-building location in large buildings.

## VoIP Providers

The FCC also announced compliance dates for the new E911 dispatchable location rules applicable to interconnected VoIP providers. For fixed interconnected VoIP services, providers must supply automated dispatchable location with each 911 call starting **January 6, 2021**. For non-fixed interconnected VoIP services, **starting January 6, 2022**, service providers must supply automated dispatchable location, if technically feasible, or registered location information obtained from the customer, or alternative location information.

Providers of outbound-only interconnected VoIP services also have new E911 obligations. By **January 6, 2022**, providers of all outbound-only interconnected VoIP services must provide automated dispatchable location if technically feasible. Otherwise, they may provide registered location information obtained from the customer, or alternative location information, or, as a last resort may route the call to a national emergency call center so long as the provider has made a good-faith effort to obtain location data from alternative sources.

### **Conclusion**

The FCC's new MLTS rules impact managers and operators of multi-line telephone systems of all sizes across all industries. Wiley's Telecom, Media & Technology practitioners can assist clients in navigating the complex rules associated with emergency calling using various types of platforms and devices.