

EVERYTHING IS CHANGING

2.16.2020

## KARI'S LAW

# Guide to E911 Regulations

Driven largely by the efforts of Kari Dunn's father following the murder of his daughter, Kari's Law was signed into law on February 16, 2018.

### What are the Kari's Law requirements?

Kari's Law applies to multi-line telephone systems ("MLTS") "manufactured, imported, offered for first sale or lease, first sold or leased, or installed" after the compliance date of February 16, 2020.

It requires:

#### REQUIRING A "PREFIX" WHEN CALLING 911 IS PROHIBITED

Locations with MLTS must remove any requirement that a caller dial "9", "8", or any other number to reach an outside line to make a call to 911.

#### ON-SITE NOTIFICATIONS

When a 911 call is placed from an MLTS, a notification must be sent to on-site personnel, alerting them to the emergency. The notifications to the appropriate contact can take the form of phone calls, visual alerts on a monitor, audible alarms, text messages, and/or emails.

### Section 506 of RAY BAUM's Act

RAY BAUM's Act was passed into law on March 23, 2018. Section 506 requires the FCC to conclude a proceeding by September 23, 2019 that considers rules to ensure that MLTS systems convey dispatchable address (defined as: "the street address of the calling party, and additional information such as room number, or similar information necessary to adequately identify

the location of the calling party") to public safety with a 911 call. On August 2, 2019 the FCC released its Report and Order that adopted such rules and concluded its proceeding as directed by Section 506.

### What does section 506 of RAY BAUM's Act cover?

Pursuant to rulemaking by the FCC, Section 506 of RAY BAUM's Act requires that organizations with MLTS provide dispatchable location, i.e., street address, floor, room and/or suite number (if applicable) to public safety with 911 calls.

#### Who's Affected by Kari's Law and RAY BAUM's Act?

Both laws impact enterprises using multi-line telephone systems (MTLS), such as:

- Companies with offices in multiple locations
- Campuses—including K-12, universities, and colleges
- Hospitals
- Hotels
- Retail facilities
- Financial institutions
- Warehouses



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## 911 Regulatory Checklist

Providing 911 emergency support in the enterprise doesn't just happen. It requires careful planning, especially in the midst of a cloud migration. Below are a list of questions and tips to help you maintain connections to 911 and regulatory compliance, while keeping your end users safe.

- ❑ **Have you consulted with legal representation regarding your compliance?** Here's a link to the to implement [FCC released its Report and Order Kari's Law and Section 506 of RAY BAUM'S Act.](#)
- ❑ **Can end users direct dial 911 without the need to dial an access code first? i.e., "\*" or "9" for an outside line? One way to think about it is:** could a child call for help without knowing how to operate the office phone system?
- ❑ **Have you accurately mapped user endpoint locations including address, building, floor and/or room?** "Dispatchable location" (part of the requirement under RAY BAUM's Act) is essentially the door that first responders need to find to assist callers. This address needs to be formatted correctly and validated for errors in a master street address guide (MSAG) format. Bandwidth performs this validation and error correction as part of our easy-to-use location provisioning process (using our dashboard or APIs).
- ❑ **Have you tested 911 across endpoints? 933** testing helps to limit the disruption that occurs when scheduling live 911 calls with public safety. Calling 933 from any Bandwidth-provisioned 911 endpoint will trigger an automated voice message relaying the caller name, call back number and address assigned to that endpoint.
- ❑ **Do you have a plan for virtual workers and satellite offices?** Your HR, facilities, and IT teams can work with your legal counsel to help you determine how to support users in remote locations.
- ❑ **Are notifications set up to notify key personnel in the event there's an emergency?** Notifications can be provided via email, phone call recording, or SMS text message formats. To help enterprises with E911 compliance, Bandwidth offers a notification feature with both our E911 for VoIP and Unified Communications and E911 Dynamic Location Routing solutions.

## Key Takeaways

- Managing 911 requires full understanding of legal and regulatory risks.
- Potential exposures occur when enterprises:
  - Fail to adequately plan for remote workers, satellite campuses, etc.
  - Fail to provide dispatchable location information at the time of a 911 call
  - Don't alert security teams and other key personnel that a 911 call has been made
  - Intercept 911 calls before sending directly to public safety
  - Replace PRI or dedicated circuits and move to the cloud
- With the passage of the two important pieces of legislation, the FCC is rapidly moving toward establishing uniform federal standards for precise "dispatchable location" as well as internal notification of on-site teams to assist in response.
- On February 16, 2020, enterprises must be compliant with Kari's Law.
  - Applies to MLTS systems "manufactured, imported, offered for first sale or lease, first sold or leased, or installed" after the compliance date
  - Be aware that enterprises that may not be legally mandated to support these requirements on February 16, 2020 may still be at risk from litigation and negative media attention if users' expectations are not met

## Don't go it alone

Complicated regulations can seem overwhelming, but Bandwidth can help. Our reliable 911 call routing and location management solutions, team of experts, and white-glove support can help you navigate these complex requirements while also helping to ensure your employees, guests, and customers are protected.



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