

Bandwidth's Guide to E911 Regulations

Maintaining compliance with the FCC's emergency regulations is complex—and it gets even more complicated if you're providing emergency services for a nomadic or hybrid workforce.

Let's cover two recent laws around 911 compliance, and how you can help protect your workforce during emergencies.

KARI'S LAW

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

What are 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.

This requires:

- 1. Prohibiting a required "prefix" when calling 911**
Locations with MLTS must remove requirements that a caller dial "9", "8", or any other number to reach an outside line in order to place a call to 911.
- 2. On-site notifications**
When a 911 call is placed from an MLTS, a notification must be sent to on-site personnel, alerting them of the emergency. Notifications to the appropriate contact can take the form of phone calls, visual alerts on a monitor, audible alarms, text messages, and/or emails.
- 3. Ensure effective call-back numbers are delivered**
911 dispatchers need to be able to reconnect with the 911 caller if a 911 call is terminated or interrupted. This shouldn't be the main number of your office, because this could connect the dispatcher to a receptionist or auto attendant.

RAY BAUM'S ACT

RAY BAUM's Act was passed into law on March 23, 2018. Section 506 required the FCC to ensure that MLTS systems provide dispatchable addresses 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.

→ *The dispatchable address must include the street address of the calling party, and should also include additional information such as suite, room number, floor, or other information needed to quickly locate the calling party.*

What does Section 506 of RAY BAUM's Act cover?

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.

There were two separate implementation phases of RAY BAUM's Act:

- 1. January 6, 2021 - Fixed VoIP:** The first deadline focused on providing dispatchable locations for employees using on-premise, fixed devices associated with MLTS.
- 2. January 6, 2022 - Non-fixed VoIP:** The second deadline focused on providing accurate dispatchable locations for nomadic employees using wireless, mobile devices.

Are you impacted by Kari's Law and RAY BAUM's Act?

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

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

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?** Check out the [FCC's Report and Order](#) to implement 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 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? Verify that any new PBX you install comes preconfigured with direct E911 capabilities.
- ❑ **Have you accurately mapped user endpoint locations including address, building, floor and/or room?** "Dispatchable location" is essentially the door that first responders need to find to assist 911 callers. This address must 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 without dashboard or APIs.
- ❑ **Have you tested 911 across endpoints?** 933 testing helps 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, callback 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 E911 for VoIP and Unified Communications, and E911 Dynamic Location Routing (DLR) solutions.

KEY TAKEAWAYS

Managing 911 requires a full understanding of legal and regulatory risks. Potential risk exposures occur when enterprises:

- Fail to adequately plan for remote/nomadic 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

After February 16, 2020, enterprises not compliant with Kari's Law are at risk.

- This 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.

After January 6, 2022, enterprises not compliant with Section 506 of RAY BAUM's Act are at risk.

- Enterprises must provide accurate dispatchable location information for both fixed and non-fixed VoIP users.
- Enterprises should also appreciate that if their equipment may not technically be required to support these mandates on January 6, 2022, an aggressive interpretation may create risk from litigation and negative media attention if users' expectations are not met in an emergency.

DON'T DO IT ALONE

Emergency 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.

Give us a call to learn more (844) 849-3835.

