

FREQUENTLY ASKED QUESTION CONCERNING MULTI-LINE TELEPHONE SYSTEM REGULATIONS

Q. What is a multi-line telephone system?

A. A Multi-line telephone system is a telephone 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 FCC under part 68 of title 47, Code of Federal Regulations), and 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. Many businesses, government agencies, hotels, and schools use these types of telephone systems. MLTS owned or leased by governmental agencies and non-profit entities, as well as for profit businesses, are all included in this definition.

Q. Why are the regulations necessary?

A. The Massachusetts Legislature directed the State 911 Department to adopt regulations to implement the requirement that, beginning July 1, 2009, new or substantially renovated multi-line telephone systems shall provide the same level of enhanced 911 service that is provided to others in the Commonwealth. The regulations are intended to ensure that Public Safety Answering Points (or “PSAPs”) receive accurate location information so that emergency responders will not be delayed while trying to find the emergency caller in need. Emergency response delays and tragedies have resulted when emergency callers have been unable to provide an address or a specific location within a large building or complex to the 911 dispatcher. This can occur if the caller is unaware of the exact address or location or is unable to convey the exact address or location. If a worksite or a school campus or business complex has multiple buildings, it may be difficult for emergency response personnel to locate the caller. A multi-line telephone system often used in large facilities and campuses may provide only the physical street address of the facility’s main building (or the address of the building in which the MLTS is located) to the 911 operator, but may not provide more specific information such as a building name or number, floor number, or room name or number. In order to prevent these types of tragedies or delays, the Commonwealth, the FCC and a number of states have enacted laws to require sufficiently precise caller location information for 911 calls made using a multi-line telephone system.

Q. Who do the regulations apply to?

A. The regulations apply to every organization using an MLTS that is physically located in the Commonwealth or that is physically located outside the Commonwealth but provides MLTS services to users located within the Commonwealth, including:

1. Persons engaged in the business of operating an MLTS (meaning a person responsible for the day to day operations of the MLTS) as defined in 560 CMR 4.00
2. Persons engaged in the business of managing an MLTS (meaning the entity that is responsible for controlling and overseeing implementation of the MLTS after installation) as defined in 560 CMR 4.00
3. Persons engaged in the business of manufacturing, importing, selling, or leasing an MLTS (meaning any person that manufactures, imports, sells, or leases (as lessor) an MLTS) as defined in 560 CMR 4.00
4. Persons engaged in the business of installing an MLTS (meaning a person that configures the MLTS or performs other tasks involved in getting the system ready to operate) as defined in 560 CMR 4.00

Q. What do the regulations require?

A. The regulations require that 911 calls originating from MLTS must provide the following: Dispatchable Location Information, a Call Back Number, Notification (if technically feasible), and Direct Dialing of 911, as all of these capabilities are defined in 560 CMR 4.00.

Q. What is Dispatchable Location Information?

A. Dispatchable Location Information means the location delivered to the PSAP with a 911 call that consists of the validated Location Database (LDB) street address of the calling party, plus additional location information such as: building name or number (if more than one building shares the same street address), floor number (if more than one floor), suite name or number, apartment name or number, and room name or number, or similar location information necessary to adequately identify the location of the calling device. ERL Identifiers and Unit Identifiers are forms of dispatchable location information. For devices located in sleeping and/or living quarters, dispatchable location information shall include a room name or number.

Q. What is a Call Back Number?

A. Call back number means a number used by a PSAP to contact the location from which the 911 call was placed. This number shall allow a call from the PSAP to reach the station used to originate the 911 call, or the number of a switchboard operator, attendant, or other designated on-site individual with the ability to direct emergency responders to the 911 caller's location 24 hours a day, 7 days a week, and 365 days a year.

Q. What is Notification?

A. Whenever a 911 call is initiated on an MLTS, the MLTS must also send notification that a 911 call has been made to a device located at the site where the 911 call was initiated and that said notification must be sent contemporaneously with the 911 call. If on site notification is not possible, then the contemporaneous notification may be sent to a device located elsewhere. Regardless of location, the device where the notification is sent must be monitored at all times so that the notification is likely to be received contemporaneously with the 911 call.

The FCC has noted that most MLTS currently deployed can comply with the Notification requirement, however, compliance is not mandatory where it is technically not feasible.

Q. What is Direct Dialing of 911?

A. All MLTS systems, regardless of when they were put into service, must be capable of and configured to call 911 directly without the need to enter any additional digits other than the digits 911. The FCC has noted that most currently deployed MLTS can comply with this requirement.

If an MLTS is actually not capable of initiating a 911 call directly without any additional digits, then each device capable of initiating a call must have immediately adjacent to, or optionally attached to the device, an **instructional sticker** that specifically instructs a caller how to make a 911 call.

If an MLTS requires a pre-fix digit to make a call, then in order to reduce the volume of on non-emergency calls to 911, the State 911 Department recommends that the pre-fix digit configured be other than the digit “9”.

Q. What about “telephones” that may not be capable of calling 911 or which may not be able to comply with all of the required capabilities such as a fax telephone or an elevator phone?

A. Not every device that looks like a standard “telephone” is capable of calling 911 and some telephones may be able to call 911 but not comply with all of the requirements of 560 CMR 4.00. In these instances, a best practice would be to attach a warning label to every such device.

For a device that resembles a standard telephone but that cannot call 911, the warning label should inform potential 911 callers of that fact and to use a different telephone. For telephones that can actually call 911 but that cannot comply with the required capabilities, the warning label should inform a potential 911 caller of that devices shortcomings and suggest the use of a different phone if within the immediate area.

Q. What should a Public Safety Answering Point (“PSAP”) do if an organization with a MLTS is not meeting the requirements of the regulations?

- A. The State 911 Department encourages PSAPs to notify us when they become aware of any discrepancies or issues that may be related to MLTS non-compliance. The best way to notify the Department is via e-mail at MLTS911@mass.gov. When doing so, please identify a specific call or calls including the date, time, and calling telephone number as well as a brief description of the discrepancies and/or MLTS compliance issues encountered. This will help the Department to specifically identify the issue so that we can work with the MLTS entity and the PSAP to resolve the issue and achieve compliance.
- B. The regulations permit PSAPs to require operators of MLTS to make 911 test calls from their location(s) to determine compliance with 560 CMR 4.00 as well as Kari’s Law and The RAY BAUM’s ACT. If necessary, the regulations also allow PSAP personnel to conduct on-site testing themselves and the Department may require MLTS operators to provide their MLTS records to the Department for inspection.

PSAPs should refer to the State 911 Department's MLTS Compliance Program on the website for additional information.

Q. What are the goals of the State 911 Department's MLTS Compliance Program?

A. The goals of the Compliance Program are education and enforcement. The Commonwealth has recently revised and published new MLTS Regulations (560 CMR 4.00) and several newsletter articles containing best practices. The first goal of the Compliance Program is to educate organizations that have deployed MLTS as to what is required and how to achieve compliance. The second goal is to enforce compliance with the 560 CMR 4.00 Regulations by communicating directly with organizations that are non-compliant with follow up on-site testing and MLTS audits.

Q. Are there any exceptions to these requirements?

A. No, there are no exceptions to these requirements.

Q. Who can I contact if I have more questions or if I would like to seek assistance?

A. We recommend that you begin by contacting your MLTS provider or reseller. If you have additional questions regarding the MLTS regulations, please contact the State 911 Department by e-mail at MLTS911@state.ma.us or by telephone at (508) 828-2911. For technical questions regarding the MLTS regulations, please ask for Deputy Executive Director Norm Fournier. For legal questions relating to the MLTS regulations, please ask for General Counsel Dennis Kirwan.

