

MLTS Compliance Program Overview

The State 911 Department (Department) has developed an MLTS Compliance Program (Program). The **goals** of the Program are **education and enforcement**.

The first goal of the Program is to **educate** organizations that have deployed MLTS concerning what is required and how to achieve compliance. To that end, The Commonwealth has produced the following educational resources:

1. Revised and updated MLTS Regulations: [560 CMR 4 \(mass.gov\)](#)
2. Revised and updated our overall 911 Regulations: [VIAppendix A Final 2023-4-25.pdf | Mass.gov](#)
3. Included articles focusing on our Regulations, MLTS test call procedures, and best practices in our monthly newsletter.
4. Added MLTS related information to our website: [Multi-Line Telephone System \(MLTS\) Regulations Information and Resources | Mass.gov](#)
5. Begun hosting monthly two-hour online participatory MLTS Workshops wherein we discuss the Regulations of the Commonwealth and the FCC and all things MLTS.
6. In this era of active school shootings, we initiated direct mail campaigns to alert K-12 public school districts and private schools, colleges, and universities to the critical public safety need of transmitting accurate supplemental location information with 911 calls.

The second goal of the program is designed to **enforce compliance** with the Regulations by communicating directly with non-compliant MLTS owners, operators, vendors, and service providers as follows:

1. Non-compliant entities are sent a **First Notice of MLTS Non-Compliance letter** via email attachment and are instructed to respond to the Department to discuss the specifics of their non-compliance. The letter contains a checklist with the suspected areas of non-compliance indicated.
2. When the First Notice Letter is sent, the recipient is added to the list of non-compliant entities on our website that is updated each month. The non-compliance list includes links that describe the nature of the non-compliance as well as a comment describing whether the entity is cooperating.
 - a. The cooperative status of the entity is shown as “First Notice Sent” for up to 30 days or until we receive a response within the 30-day period.
 - b. The status of entities that respond and begin the work of compliance remediation is updated to “Working Towards Compliance”.
 - c. If an entity does not respond within 30 days, they are sent a **Second Notice of MLTS Non-Compliance letter** via certified mail and email. The second notice letter includes notification that test calls and an MLTS record audit may be required if no response is received within 5 days.
 - d. The status of entities that are sent a second notice is changed to “Not Cooperating” until they are deemed to be cooperating.

- e. Entities that have responded to First or Second Notice letters but are uncooperative will also be listed as “Not Cooperating”.

How Does the Department Learn of Potential MLTS Non-Compliance?

The Department learns of potential MLTS compliance issues when we are notified by either a PSAP, a 911 Service Provider, or an internal Departmental source, with most notifications coming from our PSAPs.

When a PSAP receives a non-compliant 911 call from an MLTS, they are directed to notify the Department by sending an email to MLTS911@state.ma.us. The email notification must contain actionable information such as the date and time the non-compliant call was received, the name, address, and telephone number received with the call, and a brief description of the nature of the non-compliance (such as, “incorrect address”, “no location information within the building”, “could not reach the 911 caller when the number was called back” etc.). A copy of the Call Detail Record would be helpful but is not required unless specifically requested by the Department.

Demonstrating Compliance Through Test Calls to 911

Entities involved with the Program are expected to cooperate with the Department by doing whatever it takes to transition from non-compliance to compliance. They are also expected to provide periodic updates concerning the progress they have made. When they believe they have achieved compliance, they are tasked with demonstrating compliance through a structured test call process that is designed to create the data necessary to determine compliance.

If the test call process is followed and the test calls demonstrate compliance, then the test calling entity is considered to have achieved compliance. They will be notified via email that their test calls demonstrate compliance. The Department will consider them to have “graduated” from the Program and they will be removed from the list of non-Compliant entities published monthly on the Department’s website.

Note: As a practical matter, test calls are made at a specific point(s) in time demonstrate compliance at that point in time. If their MLTS initiates non-compliant calls at a future time, the compliance process will start again.

If the structured test call process is not followed, then the data necessary to determine compliance may not be created. In those instances, the test call process will have to be repeated until the data necessary to determine compliance is created.

If the test call process demonstrates that the entity has not achieved compliance, then the remediation process must continue until test calls demonstrate compliance.

The Test Call Process

The best and only way to test the compliance of an MLTS is to make actual 911 calls from devices that are controlled by or connected to the MLTS. This is done by dialing the digits 9-1-1. Some vendors offer a dial 933 feature to test MLTS compliance. Dialing 9-3-3, or any other combination of digits other than 9-1-1, will not produce the data necessary to evaluate compliance. The **ONLY WAY** to determine compliance is by making actual 911 calls from devices that are components of the MLTS.

To make a test call, dial only the digits 9-1-1 without any other pre-fix or post-fix digits – this is called **Direct Dialing**. The call will be routed to a PSAP (and if the location information transmitted with the call is correct, the call will be routed to the correct PSAP of jurisdiction for the location of the device initiating the test call). When the call is answered by the 911 Telecommunicator at the PSAP, the individual who makes the test call (the test caller) should identify themselves by name and state that they are making a test call from their MLTS. Next, the test caller should tell the 911 Telecommunicator that they are going to follow the test call process as detailed in the online document entitled **Multi-line Telephone System (MLTS) Job Aid** which may be found at the following link: [Callstation Job Aid \(mass.gov\)](http://mass.gov). The test caller should ask the 911 Telecommunicator to assist them by also using that document.

If both the test caller and the PSAP Telecommunicator follow the process detailed in the Job Aid (including the often-neglected call back to the Call Back Number step), then the data necessary for the Department to evaluate compliance (or not) will be created.

The test calling entity must create a written record of their test calls including, for each test call (including the call back to the Call Back Number), the date, time, and the telephone number of the calling device. Once the test call process has been completed, the test calling entity must email us a copy of that written test call record.

Test calls may be made between 10AM and 2PM, Monday through Friday (excluding holidays). Some PSAPs request that the test calling entity notify them just prior to beginning the test call round (in case exigent circumstances make the taking of multiple test calls at that time unwise). If the test calling entity informs the Department in advance of a date when they plan to make test calls, we can assist the test calling entity by providing a telephone number to call at the PSAP of Jurisdiction.

PSAP Responsibilities

PSAPs play two essential roles in the MLTS Compliance Program. First, as previously mentioned, the Department relies on them to provide actionable notifications of potential MLTS non-compliance. Second, the PSAPs play a critical role in determining if an entity in the Program has achieved compliance. Since the only way to determine compliance is to have the entity in the Program make a series of 911 test calls which will be routed to a PSAP, it is critical that both parties to the test call follow the documented process. If the test call process detailed in

the Multi-Line Telephone System MLTS Job Aid document is followed by the test calling entity and the receiving PSAP, then the data necessary to determine compliance will be created. The Job Aid document may be accessed at this link: [Callstation Job Aid \(mass.gov\)](#)

MLTS Workshops

The Department hosts a monthly two-hour online MLTS Workshop that is designed to familiarize the PSAPs, entities in the Program, and the public with the MLTS Regulations of the Commonwealth of Massachusetts and the FCC. We discuss the various regulations, the test call process, and we encourage questions and open discussions of any pertinent topics, including actual experiences with 911 calls or compliance issues.

We strongly encourage every entity involved with the Program to have one or more of their staff participate in a workshop.

We strongly encourage every PSAP Telecommunicator and their supervisors to participate in an MLTS Workshop so that they will be able to recognize 911 calls with MLTS compliance issues, properly notify the Department with actionable information, and be equipped to handle MLTS 911 test calls so that sufficient data is created to determine compliance.

Anyone may register to participate in a workshop by submitting a form that may be downloaded at: <https://www.mass.gov/info-details/multi-line-telephone-system-mlts-regulations-information-and-resources>

Focus on School Safety

Due to the increasing frequency of school shootings and violent incidents, the Department has placed a particular emphasis on public and private K-12 schools. In the summer of 2022, every public school district and K-12 private school received a letter from the Department". We strongly encourage every PSAP to get involved by reaching out to their local schools to invite them to make test calls.