

Multi-line Telephone Systems Compliance Program

The FCC Report and Order regarding Kari's Law took effect in February 2020. It requires that all MLTS put into service or substantially upgraded after February 16, 2020 be capable of and configured to call 911 directly without the need to enter any additional digits other than the digits 911. This requirement extends to every device capable of initiating a 911 call on the MLTS.

The Commonwealth of Massachusetts MLTS Regulations (560 CMR 4.00) require all MLTS systems, regardless of when they were put into service, to be capable of and configured to call 911 directly without the need to enter any additional digits other than the digits 911. **If an MLTS is 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.**

Kari's Law further requires that 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 Commonwealth's MLTS Regulations require that a unique Call Back Number be transmitted by the MLTS along with every 911 call and that the Call Back Number displayed at a PSAP, if called back, will ring the same device that initiated the 911 call. If the MLTS system is not capable of transmitting the unique Call Back Number of the device that initiated the 911 call, then the number displayed at the PSAP, if called back, must be 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, 365 days a year.

In addition, the Commonwealth's MLTS Regulations also require that every 911 call initiated on an MLTS device located within the Commonwealth must provide Dispatchable Location Information for receipt and display at the proper PSAP of Jurisdiction. Specifically, the location delivered to the PSAP with a 911 call must provide 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. For devices located in sleeping and/or living quarters, dispatchable location information shall include a room name or number.

Why is location information so important? There are many reasons a person calling 911 might not be able to communicate his or her specific location to the 911 dispatcher. Here are a few examples:

Someone is choking, having a heart attack, or some other physical injury which prevents them from speaking.

The caller is unable to talk or is fearful of speaking, for instance during a bank robbery at a branch location of a banking network.

A person is disabled in some way that makes telephone communication difficult or impossible, such as being deaf or mute.

The caller is a child or a visitor, and doesn't know their address/location.

The caller cannot speak English.

These are all real – and common – situations. By automatically providing specific location information through the 911 system, the 911 dispatcher is able to immediately relay fire, police, or EMS responders to the caller's location, even when the person is unable to communicate information.

Failure to comply with the requirements of 560 CMR 4.00, Kari's Law and 560 CMR 4.00 endangers the lives and safety of your employees, your customers and visitors to your facility. It may expose your company to catastrophic liability claims. The State 911 Department will be checking with our PSAPs and receiving other reports as to facilities that are not in compliance. Those who do not correct compliance issues shall be placed on a publication list of unsafe, non-compliant facilities.

If you have a multi-line telephone system, we strongly suggest you contact your local PSAP as soon as possible to either test your system, or come into compliance. Because of the diversity of the locations and capabilities of MLTS across the State, it is critical that MLTS operators work directly with local PSAPs to ensure compliance.