

Advanced E911 Product Overview

Executive Statement

Kari's Law and Ray BAUM'S Act together represent a significant improvement in public safety, ensuring emergency personnel know exactly where to respond and that responsible company personnel are aware that 911 was called and will be ready to assist emergency responders when they arrive. While compliance with Kari's Law and Ray BAUM'S Act are mandated by Congress and the FCC; LS Networks fully supports these critical improvements to public safety, and will ensure our customers have the tools they need to meet their compliance requirements.

This document, and the others found on our website provide an overview of the intent and letter of this mission critical mandate, and provides step-by-step instructions to adopt these measure for your safety, and the safety of your employees and your customers:

[Kari's Law and Ray BAUM'S Act](#)

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[AspenUC User Guide Advanced E911](#)

[SIP Trunk User Guide Advanced E911](#)

Advanced E911

In response to Kari's Law and Ray BAUM'S Act, LS Networks is adding Advanced E911 functionality to all LS Networks Voice services and mandating that all customers be provisioned with the option of using this service. Advanced E911 functionality will allow each telephone number to have a unique dispatchable location and will include Emergency Call Notification Services. Advanced E911 functionality also includes a self-care portal for customers to update the both the dispatchable location for the numbers they have loaded in the E911 database and their Emergency Call Notification Services

Customer Self Care Portal

LS Networks will use its existing AspenUC CommPortal web interface for customer management of E911 addresses on a per TN basis. This portal will be useable by customers with AspenUC services and with SIP Trunking services. AspenUC customers that have a Standard, Business, or Professional Seat will be able to administer their own lines or have them managed by the BG Admin. AspenUC Basic seats will need to be managed by the BG Admin. SIP Trunking DID's with a unique dispatchable location will need to be managed by the BG Admin for the SIP Trunk.

Dispatchable Location

The intent of a dispatchable location is to provide emergency responders with highly precise location information whenever feasible to locate the caller. Dispatchable location includes the following:

- A validated street address (e.g., against the Master Street Address Guide (MSAG) database or against a NG911 database)
- A valid callback number, preferably directly to the number that dialed the call
- Specific location
 - ~ For multi-story buildings or a campus, the floor, suite, and room number when available
 - ~ Open environments may include a wing or coordinates (northwest corner, etc.) or other information that would help identify a specific location (desk or cubical number)

At LS Networks we can register every Telephone Number individually with its own, unique address. By doing so, we can incorporate a specific floor, room, or office number into the E911 information, providing first responders with a specific location from which the emergency call was made.

Emergency Call Notification

Emergency call notification automatically notifies a customer's designated contacts in the event an emergency call is made. This service will send an alert via email, phone, or both to designated individuals at your site, ensuring the quickest possible response during an emergency. The notification can be configured by LS Networks or by a customer's business group administrator. Emergency call notification is currently only available on AspenUC fixed desk lines and SIP Trunks, it is not designed to be used with calls from the Desktop App or the Mobile App. Emergency notification can be set up on an entire business group or on individual departments/locations/trunking destinations.

Requirements

The requirements listed below are based on LS Networks understanding of the FCC rules concerning Kari's Law and Ray BAUM'S Act and should not be considered as legal advice. While this opinion is made in good faith as helpful guidance, it does not displace the need for customers to consult legal advice to determine their compliance requirements for their specific deployment of a Multi-Line Telephone System (MLTS).

Compliance with Kari's Law and Ray BAUM'S Act is the responsibility of providers, operators, and customers of Multi-Line Telephone Systems (MLTS), such as PBX's, Hosted Voice, or Unified Communications products. The FCC regulations establish three distinct compliance milestones for MLTS services as follows:

Customer Requirements

AspenUC

- Maintain their LS Networks provided Emergency Notification configuration to ensure that when a 911 call is made, a notification must be provided to appropriate on-site or off-site personnel
- Maintain an accurate dispatchable location for all devices the customer uses

SIP Trunking

- Establish and maintain Emergency Call notification if their MLTS is capable or Maintain their LS Networks provided Emergency Notification configuration to ensure that when a 911 call is made, a notification must be provided to appropriate on-site or off-site personnel
- Maintain an accurate dispatchable location for all locations and devices the customer uses by either using the LS Networks Advanced E911 service and loading the appropriate TN's in the E911 database or by establishing an E911 service with a third-party provider
- Configure the MLTS (PBX) to send the correct unique TN for each dispatchable location
 - ~ Ensure that the customer's MLTS only sends TN's that have been loaded into the E911 database

LS Networks requirements

- Establish and maintain systems and products to support for Kari's Law and Ray BAUM'S Act
- Upon initial install provision the customer provided Emergency Call notification configuration via Email, Outdial, or both
- Upon initial install load either the customer default address or load the customer provided dispatchable location for all numbers with an E911 charge

FCC Rules

Kari's Law

Kari's Law applies to all MLTS that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020 and to any existing systems where there is no significant cost burden. Kari's Law requires providers, operators, and customers of Multi-Line Telephone Systems (MLTS), such as PBX's, Hosted Voice, or Unified Communications products, to do the following:

- Emergency calls from a MLTS must be completed by direct dialing 911 without having to dial any prefix or access code, such as the number 9. In addition, MLTS installers, managers, and operators must ensure that the systems support 911 direct dialing
- When a 911 call is made, a notification must be provided to appropriate on-site or off-site personnel. The intention of this notification is to allow the notified personnel to provide assistance to the emergency services when they arrive on site.
- The contents of the notification must include, at minimum
 - ~ The fact that a 911 call has been made
 - ~ A valid callback number, preferably the number/station that dialed the call
 - ~ The information about the caller's location

Ray BAUM'S Act – Fixed MLTS

Ray BAUM'S Act applies to all MLTS that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020 and to any existing systems where there is no significant cost burden. Ray BAUM'S Act requires providers, operators, and customers of fixed Multi-Line Telephone Systems (MLTS), such as PBX's, Hosted Voice, or Unified Communications products, to do the following:

- Emergency calls from a MLTS must include a dispatchable location of the caller
- The intent of a dispatchable location is to provide emergency responders with highly precise location information whenever feasible to locate the caller (Office Reception or campus HQ is not good enough. The location must identify, for example, the room or the wing.)
- For some small businesses, the street address alone may be sufficient
- Dispatchable location includes the following
 - ~ A validated street address (e.g. against the Master Street Address Guide (MSAG) database or against a NG911 database)

- ~ A valid callback number, preferably directly to the number that dialed the call
- ~ For multi-story buildings or a campus, a specific floor, suite, and room number when available
- ~ Open environments may include a wing or coordinates (northwest corner, etc.) or other information that would help identify a specific location (desk or cubical number)

Ray BAUM'S Act – Non-Fixed MLTS

Ray BAUM'S Act applies to all MLTS that are manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020 and to any existing systems where there is no significant cost burden. Ray BAUM'S Act requires providers, operators, and customers of non-fixed Multi-Line Telephone Systems (MLTS), such as PBX's, Hosted Voice, or Unified Communications products, to do the following:

- Meet all the requirements for fixed MLTS
- MLTS providers must convey automated dispatchable location for non-fixed devices when technically feasible, but may rely on the MLTS end user to provide or confirm dispatchable location information manually

Background

Congress passed Kari's Law and Ray BAUM'S Act in 2018 and the FCC adopted its final rules on Kari's Law and Section 506 of RAY BAUM'S Act in August of 2019. The FCC set the following final dates and rules for manufacturers, providers, operators, and customers of Multi-Line Telephone Systems (MLTS):

- From 17th February 2020, anyone manufacturing, importing, offering for first sale or lease, installing or deploying a MLTS (e.g. PBX or HPBX) in the US, or making any substantial upgrades or modifications to it, must comply with the provisions of Kari's Law and Ray BAUM'S Act, with the required compliance dates being:
 - ~ Kari's Law for all MTLs: 17th February 2020
 - ~ Ray BAUM'S Act for Fixed MLTS: 6th January 2021
 - ~ Ray BAUM'S Act for Non-fixed MLTS: 6th January 2022

Resources

FCC

Information about the FCC's MLTS requirements can be found here: <https://www.fcc.gov/mlts-911-requirements>

911.gov

Helpful tools and information on Kari's Law and Ray BAUM'S Act can be found here: https://www.911.gov/project_mltsdispatchablelocation.html

Federal Register

The FCC's rules and regulations document including in-depth discussions the FCC's rules adoption can be found here: <https://www.federalregister.gov/documents/2019/12/05/2019-20137/implementing-karis-law-and-ray-baums-act-inquiry-concerning-911-access-routing-and-location-in>



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