

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Implementing Kari’s Law and Section 506 of RAY BAUM’S Act	)	PS Docket No. 18-261
	)	
Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems	)	PS Docket No. 17-239
	)	

**COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION**

NTCA–The Rural Broadband Association (“NTCA”)<sup>1</sup> hereby submits these comments in response to the Notice of Proposed Rulemaking (“NPRM”)<sup>2</sup> released by the Federal Communications Commission (“Commission”) in the above-captioned proceeding. The NPRM seeks comment on implementation of the Kari’s Law Act of 2017 and Section 506 of the RAY BAUM’S Act. NTCA supports the goal of each of these statutory provisions that, if adopted thoughtfully, will assist public safety and first responders to better serve the needs of carriers’ business and other customers that utilize multi-line telephone systems (“MLTS”).

As the Commission learned via the 2017 *ECS* proceeding,<sup>3</sup> enterprise and other consumers that utilize MLTS for their voice service needs have several options for modern

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<sup>1</sup> NTCA represents nearly 850 rural rate-of-return regulated telecommunications providers (“RLECs”). All of NTCA’s members are full service local exchange carriers and broadband providers, and many of its members provide wireless, cable, satellite, and long distance and other competitive services to their communities.

<sup>2</sup> *Implementing Kari’s Law and Section 506 of RAY BAUM’S Act*, PS Docket No. 18-261, *Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, PS Docket No. 17-239, Notice of Proposed Rulemaking, FCC 18-132 (rel. Sep. 26, 2018) (“NPRM”).

<sup>3</sup> *Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, PS Docket No. 17-239, Notice of Inquiry, FCC 17-125 (rel. Sep. 26, 2017) (“*ECS NOI*”).

systems that perform a multitude of functions. Among these available functions is the ability to convey multiple telephone numbers and station locations to Public Safety Answering Points (“PSAPs”).<sup>4</sup> Moreover, per Kari’s Law, these systems – after the effective date of February 2020 – will no longer be available in the United States if they do not allow users to direct dial 911 “without dialing any additional digit, code, prefix, or post-fix, including any trunk-access code such as the digit ‘9’”.<sup>5</sup>

That said, as the Commission also learned in the ECS proceeding, the provision of 911 service to enterprise and other MLTS users presents complications not present in a residential setting. This is principally because the accuracy of “dispatchable location information” as discussed in the NPRM<sup>6</sup> often depends on a MLTS end-user customer continually and proactively updating the data at issue, such as the location of handsets and/or individual users within buildings or multiple buildings as the case may be. By contrast, service providers – after initial installation or configuration of MLTS – lack visibility into any individual user’s location to accurately, and on a *timely* basis, update handset location or other relevant data. As small businesses, NTCA members and similarly situated operators also lack the staff resources to continually visit these end-users for the purposes of updating this information – and even if a provider could visit and “audit” locations periodically, changes could be undertaken in the intervening time that would still not be captured.

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<sup>4</sup> See NPRM ¶ 60.

<sup>5</sup> *Id.*, ¶ 13.

<sup>6</sup> *Id.*, ¶ 56.

With this context, the Commission’s current E911 rules for Voice over Internet Protocol (“VoIP”) providers should provide a useful model as to how to address more precise dispatchable location. Pursuant to Section 9.5 of the Commission’s rules, interconnected VoIP providers must “[o]btain from each customer, prior to the initiation of service, the physical location at which the service will first be utilized”<sup>7</sup> and “[p]rovide their end users one or more methods of updating”<sup>8</sup> that information. A similar approach makes sense here, requiring a service provider to configure proper location information upon installation and initiation of service only to the extent they are involved in configuration of handsets and systems in the first instance. The MLTS user should then be required to configure and update dispatchable location information as needed to account for any internal changes such as the location of handsets or users at the customer’s facility. As the record in the ECS proceeding makes clear, the majority of MLTS in use today provide end-users with the ability to easily – and oftentimes automatically – update building and floor and other location information.<sup>9</sup> Thus this approach will not impose an outside burden on even the smaller MLTS end-user.

NTCA supports the Commission’s efforts to improve the ability of first responders to quickly and accurately reach those dialing 911. The approach as proposed herein would ensure that MLTS users can enjoy all the benefits of these moderns systems including more efficient access to public safety services while also minimizing the burden imposed on providers.

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<sup>7</sup> 47 C.F.R. § 9.5 (d).

<sup>8</sup> *Id.*

<sup>9</sup> *See* NPRM, ¶ 60, n. 104.

Respectfully submitted,



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December 10, 2018