



March 25, 2019

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Ex Parte Presentation, *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

Dear Ms. Dortch:

On March 21, Colin Andrews of the Telecommunications Industry Association ("TIA"), along with Mary Brown of Cisco Systems, Paul Schomburg and Gary Moeller of Panasonic Corporation of North America, and Stephen Berger of the DECT Forum met with David Furth, John Evanoff, Michael Wilhelm, Nellie Foosaner, Thomas Eng, Brenda Boykin, Ken Carlberg, Erika Olsen (Phone), and William Beckwith (Phone) of the Public Safety and Homeland Security Bureau to discuss the above captioned proceedings.

During the meeting, we collectively urged the Federal Communications Commission ("Commission") to rapidly act on issues mandated by the Kari's Law Act,<sup>1</sup> specifically the requirements for multiline telephone systems ("MLTS") to be able to directly dial 911 and issue some form of notification that an emergency call has been placed. We stressed that the Commission should clearly define the scope of covered MLTS equipment and services. With regard to the notification requirement of Kari's Law, industry needs to know as soon as possible what the requirements will be in order to meet the February 16, 2020 statutory deadline. Additionally, we raised potential issues with requiring MLTS solutions to dial directly to 911 "out of the box," particularly for MLTS where there is no physical equipment to purchase and configure. We also discussed TIA's efforts to create a working group with members from both industry and public safety representatives in order to develop best practices and standards

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<sup>1</sup> Kari's Law Act of 2017, Pub. L. No. 115-127, 132 Stat. 326 (2018) ("Kari's Law")

regarding both the Kari's Law requirements and the mandate of dispatchable location information currently being considered by the Commission pursuant to the RAY BAUM'S Act.<sup>2</sup>

TIA, DECT Forum, and representatives of Cisco and Panasonic also discussed the technical and economic feasibility of providing dispatchable location information with emergency calls from all forms of MLTS, including mobile handsets or softphones, and discussed specific use-cases where the technology does not yet exist to effectively provide dispatchable location information. Finally, we offered to be available for future discussions as these proceedings continue and would welcome future discussions with the Commission on any specific issues raised in the docket, including potential solutions industry can provide in order to facilitate the Commission's goals.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

*/S/ Colin Black Andrews*

Colin Black Andrews  
Policy Counsel, Government Affairs  
Telecommunications Industry Association

CC: David Furth, John Evanoff, Michael Wilhelm, Nellie Foosaner, Thomas Eng, Brenda Boykin and Ken Carlberg

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<sup>2</sup> Repack Airwaves Yielding Better Access for Users of Modern Services Act of 2018, Pub. L. No. 115-141, 132 Stat. 348, 1095 (codified as a note to 47 U.S.C. SECTION 615) ("RAY BAUM'S Act")