March 25, 2019

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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:


During the meeting, we collectively urged the Federal Communications Commission (“Commission”) to rapidly act on issues mandated by the Kari’s Law Act, 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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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.²

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