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911!: Compliance Deadlines Loom Large for Business Phone Systems

Does your business operate an on-premises or cloud-based multiline telephone system (MLTS) to connect your employees to the public switched telephone network? If so, then you have probably heard quite a bit about pending compliance deadlines for rules imposed by the Federal Communications Commission (the FCC) for your routing of 911 emergency calls. If you are already working on implementation of your compliance plan, then watch this space in the next edition of our newsletter for some insights that you may find useful, and we would love to hear from you about your implementation plans. If you're wondering what all this is about, then we have your back. Read on.

As a consequence of tragic deaths caused in part by delayed responses to 911 calls, Congress passed a duo of laws, namely, Kari's Law of 2017 and Section 506 of the RAY BAUM'S Act that mandate businesses operating certain MLTSs, including cloud-based platforms, to provide certain enhanced 911 calling capabilities to enable first responders to locate the caller. Earlier this year, the FCC adopted rules implementing the requirements of Kari's Law and RAY BAUM'S Act, which went into effect on February 16, 2020. With these laws and accompanying rules in effect, businesses that operate MLTSs that were manufactured, installed or upgraded after February 16, 2020, are now required to (1) allow callers to dial 911 without the need to dial any prefix, (2) provide concurrent notification to a central contact designated by the business and (3) make available to the appropriate public safety access point dispatchable location information for the caller. These requirements apply with respect to on-premises fixed devices (e.g., desk sets and wall phones), on-premises nonfixed devices (e.g., softphones installed on laptops or smartphones) and off-premises devices (e.g., any session-initiated protocol device, including desk sets and smartphones) associated with the MLTS. The deadlines for compliance with these E911 requirements are January 6, 2021, for fixed-location phones, and January 6, 2022, for mobile devices.

In current times, when work has moved to the virtual world and businesses are transitioning their telephones to cloud-based platforms to accommodate remote workers, these requirements bring unique considerations as well as challenges to businesses. Our technology attorneys at Day Pitney have been advising clients on how to implement their MLTS to achieve timely compliance with the FCC's requirements, and we will share some guidance in our next edition of this newsletter. In the meantime, we welcome your calls or messages with any questions or thoughts. With just a few months left to comply, we understand the emergency!

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