Managing E911 for Compliance and Safety
Lesson's Learned from the Enterprise Connect 2023 Panel Session

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1. **Is E911 the right term anymore?**
NO. Although some E911 networks will likely exist for years, with state and federal funding for NG911 moving forward, NG911 networks are being built in dozens of areas. Talking about E911 would be like talking about analog phones on a SIP PBX.

Should we abandon it and only focus on NG911?
YES, that would be the most proactive decision moving forward.

2. **What responsibilities do companies have to provide E911 location and call routing management for remote employees?**
The companies are required ALL DEVICES to provide compliance with both Kari's Law and the RAY BAUM'S Act.

3. **What does it mean to be compliant with RAY BAUM's Act and Kari's Law?**
Compliance is required by the US Code of Federal Regulations under §9.5, requiring compliance with the rules outlined in Kari's Law and the RAY BAUM'S Act. There is no credit for partial compliance. Businesses are either compliant or not. Specific requirements include:

1. Direct Dial to 911 – NO CODES
2. No Local Interception of the call
3. On Site Notification
4. Callback number to the facility to a person with knowledge of the incident
5. Dispatchable Location to the ECC/PSAP and delivered On Site contemporaneously

All 5 are required to be compliant.

4. **Do old phone systems require upgrading?**
Not by the law, but if they ARE UPGRADED, they must be made compliant.

Who is responsible for compliance?

All parties involved are responsible. This includes the manufacturer, the installer, and the end-user customer.

5. **Is it safe to assume that employees will call 911 from their personal mobile devices so companies don't have to worry about compliance?**

The laws dictate dialing capabilities from Multi-line Telephone Systems (MLTS) telephones not native calls on cellular devices. Those calls must be compliant if they call on an Enterprise App on the cellular device.

6. **What are the limitations of 911 calling for personal mobile devices and for emerging FMC solutions like Verizon OneTalk, Teams Phone Mobile and Webex Go?**

US CFR 47 mandates Kari's Law and RAY BAUM'S Act compliance for MLTS calling. At this point, other services are not covered under these laws.

7. **What are the best practices for handling 911 calls for employees who do not have a dedicated DID?**

From an access perspective, these devices need to be able to dial 911 directly, report their location internally, as well as to the ECC/PSAP, provide some callback number at the facility, as well as provide on-site notification.

8. **What are the costs and risks of non-compliance?**

US CFR 47 defines the default penalty for violation as $10,000 per day per occurrence plus $500 per day per device.

9. **There is a distinct lack of clarity around the definition of "dispatchable location." What does it mean?**

The RAY BAUM'S Act §506 is defined, but leaves it up to the customer to achieve the result without specifying a specific process or technology. The requirement is to get first responders to the MSAG-verified street address of the facility and then provide location information where the caller can be located in a reasonable time. That can be interpreted in many ways and is a matter for a lawyer to advise what is appropriate.

10. **How should 911 strategies integrate with overall incident management and response strategies?**

Every facility should maintain an emergency response plan for multiple incident types. 911 calls are another emergency incident type and should be included in the overall plan.

11. As an enterprise IT leader, what should I plan for concerning NG911?

The migration to NG911 is similar to the migration from TDM to digital telephony, analog telephony to VoIP telephony, or fixed to wireless. Each evolution brings on a challenge from a technology perspective and must be assessed based on the impact of that technology on daily operations.

What investments do I need to make?

E911 is quickly becoming end-of-life in the commercial space, and at this juncture, businesses should not be investing in end-of-life architecture. Instead, NG911 solutions that are standards-based are available today and are backward compatible should be the investment direction for a corporate environment.

12. What information must companies convey to employees with respect to the ability of the company to accurately route 911 calls with dispatchable location information?

A company should include reminders and training as they do for any life safety solution deployed throughout the company. Best practices include fire drills, first aid kits in strategic areas, fire extinguishers, and floor fire wardens. In addition, employees should be trained on the proper use of communications devices and the intricacies of making an emergency call as part of their regular onboarding and annual training.

13. What final recommendations do you have?

Over the last decade, communication devices and methods have undergone significant changes and will continue to evolve with advancements in technology. The traditional method of calling 911 will soon become outdated, and generating emergency service requests through various communication modalities will become more common in the future, just as it is already happening in some cases. In the past, you would call the fire department in case of a fire, but with the availability of advanced fire alarm systems, more sophisticated suppression systems and alerting mechanisms have been put in place to enhance the protection of individuals and employees. Similarly, 911 emergency response is undergoing a similar evolution to better safeguard citizens and staff.