

# Kari's Law and RAY BAUM'S Act Compliance

Kari's Law and RAY BAUM's Act are two pieces of legislation that have been adopted and implemented in the United States by the Federal Communications Commission (FCC or the Commission). Together, the "Laws" aim to provide the public with greater access to 911 emergency services while also improving emergency response outcomes.

The legislation primarily affects US-based manufacturers, managers and operators of multi-line telephone systems (MLTS), commonly used in commercial office buildings, hotels and post-secondary campuses, and requires certain organizations to comply with each. Phones in an MLTS can be fixed-line (like most hotel rooms and admin phones), or non-fixed line (like cordless or roaming wifi phones, or even cell phones that work with the MLTS). All manner of multi-line telephony can be considered MLTS, including traditional analog phone service, VoIP, over-the-top applications, Internet-based Telecommunications Relay Services (TRS) and mobile text service.

As of January 6, 2020 all person engaged in the business of "manufacturing, importing, selling, leasing installing, managing or operating" MLTS systems have been required to be compliant with Kari's Law. As of January 6, 2021, only fixed-line MLTS is subject to compliance with RAY BAUM'S Act. Compliance of non-fixed lines will be required by January 6, of 2022.

The Laws apply to non-legacy MLTS; i. e., MLTS that is manufactured, imported, offered for first sale or lease, first sold or leased, or installed on or after February 16, 2020.

### **KARI'S LAW**

Kari's Law requires that non-legacy MLTS - such as those used by hotels and campuses -allows users to dial 911 directly, without having to dial a prefix such as a "9" to reach an outside line. To facilitate building entry by first responders, Kari's Law also requires such MLTS to provide contemporaneous notification to a central location designated by the MLTS Customer. The location may be on or off the Customer's site, and must be staffed with a human who can receive the notification (e.g., a front desk or security office). In addition Kari's Law requires that the notification include, at a minimum, (a) the fact that a 911 call has been made; (b) a call back number for the 911 caller (or some other centralized on-premises number, if a call back number to the caller is not technologically feasible); and, (c) the caller's location, as provided by the MLTS to the PSAP.

## **RAY BAUM'S Act**

Section 506 of RAY BAUM'S Act has been enacted to ensure that "dispatchable location" information, such as the street address, floor level, and room number of a 911 caller is conveyed with 911 calls, so that first responders can more quickly locate the caller. RAY BAUM'S Act requires that the dispatchable location information be transmitted to the PSAP.

Section 506 of RAY BAUM'S Act became enforceable for fixed-line phones on January 6, 2021. Enforceability of Section 506 of RAY BAUM's Act for non-fixed line (mobile, cordless, and re-locatable) phones will occur next year.



### **BLUIP COMPLIANCE WITH KARI'S LAW AND RAY BAUM'S ACT**

BluIP takes Kari's Law and RAY BAUM's Act very seriously. BluIP's E911 solution is designed to comply with requirements of both Kari's Law and the applicable portions of RAY BAUM's Act.

BlulP's, MLTS solution allows a caller to dial 911 without a prefix. Additionally, BlulP's MLTS is capable of sending a notification to a centralized location, designated by the Customer. Finally, all such BlulP MLTS solutions are configurable to provide the requisite "dispatchable location" data of the 911 caller to the designated staffed location, and to the PSAP.

To create an effective and compliant solution, each Customer will work with BluIP (or each End User with it's Reseller, as applicable) to map all extension locations of a Customer's/End User's premises. BluIP's Customers and Resellers (on behalf of End Users) will be upload phone number/location information via a 911 Support ticket. Once uploaded, BluIP will configure each phone number with its corresponding location information. Going forward, BluIP's Customers and Resellers (on behalf of End Users) will provide all phone number/location information changes via a 911 Support ticket.

BluIP's solution is simple and compliance is readily available.

## CONCLUSION

Kari's Law and Section 506 of RAY BAUM'S Act are separate laws with distinct requirements and differing enforcement dates. BluIP is pleased to announce that its E911 Service now offers compliance with Kari's and RAY BAUM's Act.