

- My PBX system was installed in 2019. Does this system have to be compliant with Kari's Law and RAY BAUM's Act?
  - Only systems that are sold, manufactured, implemented, imported, installed or significantly updated, after February 20, 2020 must be compliant. There is no other requirement to make existing systems compliant. When existing MLTS systems are upgraded or significantly improved, they must be brought into compliance at that time. The FCC has noted that "improvements to the hardware of the system do not include the provision of additional extensions or lines" and "improvements to the software of the system do not include minor software upgrades that are easily achieved or made to improve the security of the system." Whether an upgrade or improvement triggers compliance will be determined on a case-by-case basis. In general, we would expect that routine updates and minor upgrades would not trigger a compliance obligation, but updates and upgrades to the core network components would.
- What if I purchase an MLTS system now but use only analog phones with analog trunks, does my PBX system have to be compliant with Kari's Law and RAY BAUM's Act?
  - Yes. Kari's Law and RAY BAUM's Act applies regardless of the type of MLTS phones you will be using.
- What if there are only two people working from our home-office, does our phone system have to be compliant with Kari's Law and RAY BAUM's Act?
  - Yes. Any enterprise networked communications system that serves two or more lines is likely to be considered an MLTS subject to compliance with Kari's Law and RAY BAUM's Act.
- As a customer, what do I need to provide to BluIP to provision my BluIP services in light of Kari's Law and RAY BAUM's Act?
  - Through a BluIP dedicated 911 support ticket, you must provide dispatchable location information for each phone extension capable of dialing 911, as well as a centralized location for BluIP to route notification. In addition, through a BluIP dedicated 911 support ticket, you must provide the extension for receipt of 911 call notifications. In order to be compliant, the information has to be valid, accurate and sufficiently detailed to enable emergency personnel to readily find the caller's location AND you need to have received confirmation, via the BluIP support portal, that the information has been received.



- What if I add a new wing, floor or room? How do I inform BluIP of dispatchable information changes?
  - o Through a BluIP dedicated 911 Support ticket, you must provide all updates to previously provided dispatchable location information as well as dispatchable location information for all newly added extensions. In order to be compliant, the information has to be valid, accurate and sufficiently detailed to enable emergency personnel to readily find the caller's location AND you need to have received confirmation, via the BluIP support portal, that the information has been received.
- Do Smartphones and Tablets that have phone clients also need to be compliant with Kari's Las and RAY BAUM's Act?

Yes. But, non-fixed MLTS providers have an additional year to provide dispatchable location or, if dispatchable location is not feasible, an alternative location (likely geolocation).