

Kari's Law compliance obligations begin February 16, 2020

February 10, 2020

Kari's Law, [signed into law on February 16, 2018](#), requires organizations that use multi-line telephone systems (MLTS) to provide callers with the ability to dial 911 directly from any telephone in the system. MLTS are often used in hotels, office buildings, corporate and educational campuses, and other enterprises. As a result, a wide variety of organizations will be impacted by Kari's Law and must comply with its requirements.

The Federal Communications Commission (FCC) recently published its [implementing regulations](#). The regulations went into effect on January 6, 2020, with a compliance date of February 16, 2020.

Overview

Kari's Law requires MLTS to: (1) enable callers to dial 911 directly, without having to dial a prefix, such as "9," to reach an outside line; and (2) provide notification to the facility using the system when a 911 call is made.

The FCC's regulations define an MLTS as "a system comprised of common control units, telephone sets, control hardware and software, and adjunct systems, including network and premises based systems, such as Centrex and VoIP, as well as PBX, Hybrid, and Key Telephone Systems...and includes systems owned or leased by governmental agencies and non-profit entities, as well as for profit businesses." Therefore, the regulations apply not only to traditional, circuit-switched MLTS but also to MLTS that are Internet Protocol or cloud-based.

Kari's Law and the FCC's implementing regulations apply to MLTS manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020. MLTS currently in operation are not required to comply with the rules unless those systems are significantly modified following the February 2020 compliance date. Although the regulations do not require notice to consumers that equipment manufactured and installed before February 16, 2020 are meeting the requirements of Kari's Law, the FCC has encouraged providing such information.

If an MLTS undergoes "significant" improvements on or after February 16, 2020, those improvements may trigger the compliance obligations and retrofitting requirements under Kari's Law. The FCC declined to define the level of improvements that would require systematic

equipment upgrades. Instead, the FCC said that concerned organizations may file petitions for declaratory ruling to resolve uncertainty in a specific circumstance.

Configuration

Kari's Law and the FCC's implementing regulations impose obligations on two broad categories of organizations – those that provide MLTS and those that implement MLTS.

- Organizations that provide MLTS include "manufacturers," "importers," "sellers," and "lessors." The FCC's rules require manufacturers, importers, sellers, or lessors to ensure that the MLTS is preconfigured such that anyone using the system may directly dial 911 from any station, without dialing any code or prefix.
- Organizations that implement MLTS include "installers," "managers," and "operators." The regulations require installers, managers, and operators to ensure that the MLTS is configured such that a user may directly dial 911 from any station, without dialing any code or prefix.

Installers, managers, and operators must also ensure that the MLTS is configured to provide notification to a central location on the premises or to another person or organization regardless of location. However, installers, managers, and operators are exempt from the notification requirement if such a configuration requires an improvement to the software or hardware of the MLTS. Improvements may include upgrades to the core system of the MLTS, substantial software upgrades, or software upgrades requiring a significant purchase.

Notification

The regulations clarify that the MLTS notification must be initiated at the same time as the 911 call, provided that it is technically feasible to do so. However, the notification cannot delay the call to 911. The MLTS notification must be sent to a location where someone is likely to notice it, but the location does not have to be manned at all times or located on the premises. Ideally, the person designated to receive the notification is someone who has knowledge and access to assist first responders.

The MLTS notification must be conspicuous and likely to draw attention, such as on-screen messages with audible alarms or text messages. The notification must at a minimum include:

- The fact that a 911 call was made.
- A valid callback number.
- Any location information provided to the public safety answering point.

The callback number and location information do not have to be provided if it is not technically feasible, and the notification may provide a main phone line if it is not possible to provide the caller's direct line. Organizations may include additional information above and beyond the minimal requirements.

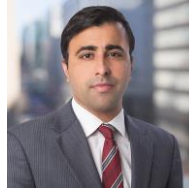
Next steps

The Kari's Law requirements apply to MLTS manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020. Organizations developing or installing new MLTS systems or planning significant improvements to existing MLTS systems should be mindful of these obligations.

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